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February 29, 2012

Keith Ashfield
Minister of Fisheries & Oceans
15th Floor, Centennial Towers
200 Kent Street
Ottawa ON
K1A 0E6

Dear Minister Ashfield:

Re “The Future of Canada’s Commercial Fishery”

This is to confirm that our Union fully endorses the submission forwarded to the Department by Marc Allain on behalf of a substantial number of fish harvester organizations representing the overwhelming majority of the inshore fishing fleet in Atlantic Canada. The breadth of support for this submission within the inshore/midshore sector in Atlantic Canada is unprecedented in my 35 years of involvement with fish harvester organizations.

It is also consistent with the very clear outcome of the Atlantic Fisheries Policy Review process, in which the Owner-Operator and Fleet Separation policies were also very widely endorsed. The Owner-Operator fleets are the cornerstone of coastal communities throughout Atlantic Canada. These fundamental policies ensure that fish resources are allocated directly to those who invest in fishing boats and equipment and catch the fish. This model is far superior to the British Columbia model, where policy rewards speculators, middle-men and wheeler-dealers at the great expense of the people who own and operate fishing vessels and actually catch the fish.

We feel the consultation process fell far short of the level that was employed during the Atlantic Fishery Policy Review process a few years ago. A single, closed-door, invitation-only meeting for the entire province of Newfoundland and Labrador is totally inadequate. There were more representatives invited from the 65'-10' fleet, which numbers only 5 or 6 license holders, than from the entire Owner/Operator-based inshore and midshore fleets, which involve about 4,500 core enterprises.

We also feel the online format made a mockery of the consultation concept, posing leading questions and asking what policies or regulations people wanted to get rid of without providing a comparable format for respondents to indicate which policies or regulations they support.

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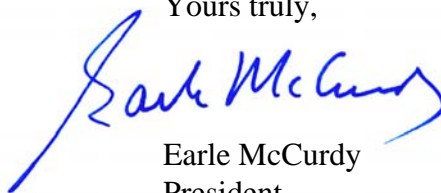
The discussion paper itself was littered with platitudes which said practically nothing of substance. Who is not in favour of sustainability and prosperity? The paper reflected a systemic bias in the DFO bureaucracy in favour of fisheries based on property rights, including the unsubstantiated inference that property rights-based fisheries are more sustainable than fisheries managed by other means. The actual track record tells quite a different story. While the lobster fishery, which is managed entirely by input controls, has had an exemplary conservation/sustainability track record, the 14 or 15 groundfish stocks which were placed under moratorium during the 1990s - some of which remain under moratorium today - were all managed, either in whole or in part, under an ITQ regime.

Notwithstanding these shortcomings, and the unreasonably short deadline for responding to this policy review, we have clearly been able to demonstrate, through individual representations to the process by our members and the consensus document endorsed by the major harvester organizations throughout Quebec and the Atlantic Provinces, tremendous support for the strengthening of the Owner-Operator and Fleet Separation principles.

The discussion document talked about a "long-term stable approach" to fisheries management, but at the same time re-opened policy matters settled after exhaustive consultation only a few years ago.

Of course we would welcome streamlining of fisheries regulations, but it has to be based on a foundation of principle. Owner-Operator and Fleet Separation are the core of that foundation. Once those principles are nailed down and strengthened, we are prepared to immediately enter into a fishery-by-fishery analysis of options, in co-operation with regional DFO officials, to seek ways to streamline the regulatory framework. Shared stewardship requires that this be done on a fishery by fishery basis, not a one-size-fits-all approach designed by the Ottawa bureaucracy.

Yours truly,



Earle McCurdy
President

cc Claire Dansereau
Kevin Stringer
David Balfour