

February 27, 2006

The Honourable Loyola Hearn, Minister
Fisheries and Oceans Canada
200 Kent Street,
Ottawa, Ontario, K1A 0E6

Dear Minister:

We are writing on behalf of the Pacific Marine Conservation Caucus (MCC) Groundfish Committee regarding your impending decision on recommendations in the Commercial Industry Caucus Pilot Integration Proposal (the “CIC Proposal”), which is part of a process to integrate the management of B.C.’s groundfish fisheries. We’d like to congratulate the CIC for the tremendous amount of time and energy they committed to create an integrated fishery that balances competing economic interests while making conservation gains.

The CIC Proposal is a positive first step, and the MCC Groundfish Committee is generally supportive of it. We support the move to account for all rockfish catches in the groundfish fleets, more rigorous monitoring of catches at sea through 100-percent electronic monitoring, a framework that allows for the transfer of quota to more sustainable gear-types over time if needed, a framework that imposes rockfish caps on each fleet to fish responsibly, and a “fleet separation” policy that protects small-boat fishermen.

However, there are several issues that we believe the Department and Fisheries and Oceans, in consultation with all stakeholders, including First Nations and the MCC, needs to address. These include:

- There are some 100 groundfish species of some commercial value on the coast, and most have no stock status information. More than half are not protected by Total Allowable Catch (TAC) restrictions, and many TACs are based on inadequate science. DFO must secure adequate financial resources to conduct the necessary research and undertake proper stock assessment to ensure that catch levels are sustainable and scientifically defensible.
- DFO must allow public access to scientific and catch data. Failure to do so restricts third party research and scrutiny of management decisions. The MCC boycotted the Canadian Groundfish Integration Advisory Committee (CGIAC) because our respective members were denied access to DFO data that would have allowed us to do proper research and make informed decisions about the integration of groundfish fisheries.
- The CIC Proposal does not deal with the issue of protecting sensitive seafloor habitats from destructive fishing practices. This issue must be dealt with as a matter of urgency. DFO needs to assess the impacts of various gear-types on

habitat, and phase in a program that rewards lower-impact and more selective fishing technology.

- DFO needs to set some minimum standards regarding quota consolidation and ownership with the objective to prevent the usurious leasing and selling of scarce rockfish quotas. This is a very real threat against small-boat fishermen and could jeopardize the viability of the entire integration process. Furthermore, an “owner-operator” policy could reduce the number of non-active fishermen accruing rents from the fishery, and could contribute to the economic viability of working fishermen.
- There needs to be a review of the mortality rates on all groundfish species, especially undersized and/or unmarketable fish, to ensure that DFO is properly accounting for the mortality of fish discarded at sea.
- The CIC Proposal fails to address the ongoing over-fishing of rockfish by commercial and recreational fishermen in Area 4B, and the continued prosecution of the “Option B” trawl fleet in Area 4B, which harvests a suite of species without total-allowable-catch limits. The Option B trawl fleet is not included in the CIC Proposal for full catch monitoring and catch accounting.
- DFO officials must live up to the commitments made by a series of fisheries ministers and allow the MCC full-status stakeholder participation in all DFO stakeholder consultation processes. This is especially necessary in groundfish-fisheries management. Furthermore, no single group should be marginalized to the advantage of other groups in these processes.
- The MCC expects DFO to resume its work in identifying and setting aside sufficient harvest refugia for rockfish, coastwide.
- DFO needs to set some clear social, economic and conservation benchmarks for the integration of the groundfish fisheries by which its success or failure can be measured. DFO must commit to an evaluation process that allows stakeholders, including the MCC, to evaluate the implementation and operation of the integrated fishery, and allow for further reform if the benchmarks are not met.

Again, the MCC Groundfish Committee would like to reiterate our general support for the CIC Proposal as a means to integrate the commercial groundfish fishery, although we believe that the proposal can be improved in a number of ways. We look forward to working with DFO and fellow stakeholders to implement the CIC Proposal and deal with the outstanding issues noted above.

Best regards,

Groundfish Committee—Pacific Marine Conservation Caucus

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BC Chapter

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cc: Paul Sprout, DFO, Regional Director General (Pacific)
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