

January 20, 2011

Gail Shea  
Minister Fisheries and Oceans Canada  
200 Kent Street  
Ottawa, Ontario K1A 0E6  
Canada

Re: Sector allocation of Pacific halibut

Dear Minister Shea,

In light of the current debate regarding the allocation of Pacific halibut, the Marine Conservation Caucus would like to provide your office with our perspective on conservation considerations for the associated fisheries. The MCC is officially recognized by Fisheries and Oceans Canada (DFO) as the primary stakeholder group representing conservation interests in Canada's Pacific fisheries.

As you know, the Department is currently the target of a highly visible effort to increase the allocation of halibut to the British Columbia sport fishing sector. While the MCC does not directly engage in issues of allocation, we do feel that it is important to state our opinion in situations where allocation decisions have conservation implications.

Our conservation concerns regarding this issue stem from the substantial gap that still exists between the monitoring standards for the commercial and the sport sector, and particularly the portion of the sport sector composed of the commercial guide operations. Whereas the commercial halibut sector has adopted, at considerable cost to themselves, a system that ensures 100% at-sea and dockside monitoring and full accountability for all species caught, targeted and non-targeted, the guide sport sector has no at-sea monitoring and insufficient dockside monitoring (i.e., creel survey), and therefore no adequate mechanism to ensure accountability for its catch.

Even by the numbers reported under this incomplete monitoring system, the sport fishing sector has exceeded its combined recreational/leased commercial halibut TAC in five of the previous six years, with the preliminary numbers for 2010 indicating an overage of more than 100,000 pounds – which, it should be noted, will not be deducted from the recreational sector's 2011 TAC. Accountability and fishing within catch limits are principles fundamental to sustainable fisheries irrespective of license type and allocation. In our judgment, the commercial halibut sector meets these principles; the sport sector does not yet do so.

Furthermore, we would like to call attention to a claim being repeated by the sport sector; namely, that their fishery will be shut down midway through their peak season. This dire warning is based upon a major assumption by the guide sport sector: that your department will grant them their wish and allow them a 2/2 possession/daily limit, rather than a 2/1 limit. Your department has not yet made this decision, and therefore that sector's warnings about a mid-season shutdown are premature and are based upon a daily catch limit that they, in fact, *hope* to

receive. It is unrealistic for any sector to have a guaranteed access policy as halibut stocks naturally fluctuate over time. At present, stocks are low and therefore all sectors need to respect this reality and adjust businesses accordingly. Similarly stocks may improve to the point where all sectors could expect an increase.

The current debate is centered on access to an economically valuable Canadian species. We feel, therefore, that a market-based solution will be a necessary component in resolving this issue. In recent years your department has been working on a process to improve the exchange of quota between the commercial and sport sectors. We encourage the continuation of this approach.

Ultimately a fair, equitable, and predictable allocation scheme is in the best interest of all sectors. A rushed, politically charged decision will only serve to harm resource users and the resource. A misinformed reallocation of halibut TAC in response to media and political pressure will undercut formal processes that are being or have been established for such decisions, such as the new Pacific region Groundfish Integrated Advisory Board. This board is a primary forum for addressing broad issues relating to allocation.

In summary, the current lack of oversight of the recreational sector is a substantial conservation concern to our organisations. Until these concerns are addressed, we cannot support a sudden reallocation of halibut TAC from the well-managed commercial sector to the sport sector.

Sincerely,



Scott Wallace, David Suzuki Foundation  
Chair, Marine Conservation Caucus Groundfish Committee

On behalf of the Marine Conservation Caucus

John Driscoll, Living Oceans Society  
Misty MacDuffee, Raincoast Conservation Foundation  
Vicky Husband, Watershed Watch Salmon Society  
Ernie Cooper, World Wildlife Fund

Cc:

Claire Dansereau, Deputy Minister  
Dan Cody, Policy Advisor to the Minister of Fisheries and Oceans  
Randy Kamp, Parliamentary Secretary to the Minister of Fisheries and Oceans  
Sue Farlinger, Regional Director General, Pacific Region