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## **FOPO PRESENTATION, PROTECTED AREAS, MAY 11, 2017**

The BC Seafood Alliance is an umbrella organization whose 17 members represent about 90% of wild harvested seafood from Canada's West Coast, worth about \$850 million annually. Our members are associations representing all or most of the licence holders in virtually every major wild fishery in BC. That includes salmon and herring, once the backbone of the industry, but now overtaken by the success of prawns, sablefish, halibut, geoduck, and other groundfish and dive fisheries. We are by far the most representative fishing organization on the West Coast—and our ultimate constituents are independent fishermen and businesses up and down the Coast. These are the people who provide food to Canadians and the world.

I want to talk a little about our fisheries first, in part because I have been dismayed by the lack of understanding about fisheries and fisheries management displayed by some of your previous witnesses. I'm referring to the assumption that what may hold true for fisheries in other parts of the world—such as overfishing, an increase in fishing footprint, wasted and unreported catch—applies in British Columbia. This is simply not true.

Conservation has driven our sector for the past 20 years, shaping the way it has developed and encouraging a pragmatic approach to stewardship that has had clear market benefits as well. More than half our fisheries by volume are in the Marine Stewardship Council (MSC) program. The MSC is an international organization that assesses through an independent, arm's length process the sustainability of fisheries. It is the gold standard for third-party certification with only about 10% of the world's fisheries able to qualify. We are part of that 10%. Most of our other fisheries are recognized either by the Monterey Bay Aquarium's Seafood Watch or the Vancouver Aquarium's Oceanwise as good choices for consumers.

By volume almost 2/3 of our fisheries are managed under the Canadian Groundfish Integration Program (CGIP). CGIP integrates the management of 66 different species, seven different fishery sectors, and three gear types (hook and line, trap and trawl). Under CGIP a vessel is fully accountable for every single fish it catches, whether retained or released, through a monitoring program that includes 100% at sea observer or electronic monitoring and 100% dockside monitoring. This program is recognized by the MSC as "one of the most rigorous in the world," by HRH Prince Charles' Sustainability Unit as a world fisheries success story, and by the David Suzuki Foundation, to become among the best managed fisheries on the planet." CGIP creates incentives for long term stewardship of the resource and the ecosystem, encouraging fishermen to be highly selective, catching the fish they want and not weak species or those with low abundance.

For example, our groundfish trawl fleet, working again with the David Suzuki Foundation and other conservation groups through a Habitat Conservation Collaboration Agreement has frozen the trawl footprint, removing 9,000 sq. km of the coast, protecting 50% of all habitat types, especially deepwater habitat, and instituting the world's first conservation bycatch quota for corals and sponges. Fleetwide, this quota was set at 4,500 kgs. In fact, total catch of corals has been less than 1/5<sup>th</sup> of this amount.

I provide this information as context for the points I want to make on marine protected areas. Let me be clear: we support the international commitment and the Minister's target of protecting 5% of our coastline by the end of this year and 10% by 2020, and we believe that we can and should be partners in achieving this goal. But we are becoming more sceptical that what's happening on the West Coast meets the government's professed commitment to science, evidence-based decision making, transparency and collaboration.

Here is where we are on the Pacific Coast according to Environment and Climate Change Canada's most recent international reporting according to UN and IUCN rules. Despite comprising less than 8.0% of Canada's oceans, BC accounts for over 28% of Canada's marine protected areas. We currently protect 3.2% of the marine and coastal area. New areas identified for protection, such as the Scott Islands National Marine Wildlife Area, will take that to 6.3%. In addition, we expect an announcement soon of a large, pristine offshore area. If this protects just 10% of the offshore, then the total level of protection in BC increases to about 13.2% by 2020. And this is before we include Other Effective Area-based Conservation Measures or new protected areas in the Northern Shelf under the Canada-BC MPA Network Strategy.

British Columbia must do its part to help Canada achieve its international targets but we should not be expected to shoulder more than our fair share.

Protected areas are certainly part of the fisheries management tool box, especially for protecting spawning areas, habitat and special benthic features. For instance, our groundfish fleet voluntarily protected the Hecate Strait glass sponge reefs from 2001 on until it became a formal closure in 2003 and eventually designated as an MPA earlier this year.

Most of the science on MPAs has looked at warm zone coral reefs, where fish are tied to place, usually in areas where fisheries management does not work. In such cases, there is strong evidence that MPAs, including large no-take zones, work. By contrast, the science clearly suggests that in areas such New Zealand, Australia, the US, Canada, Iceland, Norway and even to a large extent the EU, all countries with good management systems, that biodiversity goals are best served by strong fisheries management (particularly enforced harvest control rules). In fact, in these jurisdictions, there is evidence that MPAs simply displace fishing activity and concentrate it irresponsibly in other locations, reducing not increasing biodiversity.<sup>1</sup> This makes ecosystem-based management harder to achieve while increasing dependency on foreign fisheries that are not as well managed as our own.

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<sup>1</sup> Caveen, AJ et al, MPA Policy: What Lies Behind the Science, *Marine Policy* 37 (2013) 3-10, p.4. and notes 36-38

On the West Coast, we are not seeing a lot of evidence-based decision making—we are seeing political decision-making. The exact boundaries of fishing limitations around the Hecate Strait sponge reefs were a consensus recommendation from a multi-stakeholder group that included the eNGO community for Canada Gazette 1. Those boundaries were changed by the federal government in response to automated responses from eNGO websites. We see the same thing with the response to the Canada Gazette 1 on the Scott Islands NMWA—more than 10,000 automated, push button responses from eNGO websites apparently outweigh science and analysis and the considered consensus recommendations from the advisory committee, which included some of those same eNGOs. This is not how you do evidence-based decision making, and it is not how you do transparency and collaboration.

On the West Coast in particular, we are also apprehensive about the convergence of protected areas and Reconciliation because this looks like reallocation by zoning without compensation. Let me be clear again: we support Reconciliation with the indigenous peoples of Canada. But whether it is protection or Reconciliation or both, this cannot be on the backs of commercial fishermen and their families, at least one-third of whom are indigenous themselves. Fishermen on the West Coast, the family businesses in both harvesting and processing that have diversified, adopted cutting edge practices and technology, developed new markets and new products, are at risk here. You are charged with scrutinizing the policy and approach on protected areas—we ask you to do exactly that and not be swayed by views of fisheries and fish management that apply to other places in the world but not in British Columbia.

The threats to our oceans are real but they come from oil and gas exploration, the prospect of sea bed mining and ocean acidification, not fishing for food. Large no-take fishery zones will not help deal with these problems. We are partners in the goals of 5% and 10% and will always be ready to protect special features. But closing large areas to fishing off the West Coast does little for biodiversity or conservation, little for the men and women up and down the coast working in our sector who are middle class or aspire to the middle class, and little for the health of Canadians who deserve access to local, sustainable seafood.

On the West Coast we believe we can have both biodiversity and healthy, sustainable fisheries that provide food to Canada and the world—and indeed we have been working with the environmental community towards this end. I appreciate the chance to talk to you about the complexities of this issue and of course am ready to answer your questions.

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