



Comments on: Review of Allocation Decisions that have taken place since 2007 in the Gulf Atlantic Halibut Fishery

On behalf of:

- Prince Edward Island Fishermen's Association
- Gulf of Nova Scotia Fishermen's Coalition
- Gulf Bonafide Fishermen's Organization
- Northumberland Fishermen's Association
- MFU Local 4
- North of Smokey – Inverness South Fishermen's Association
- 4VN Management Board

April 18, 2016

Executive Summary

The Southern Gulf is a thriving, multi-species fishing area comprised of numerous associations set up to represent thousands of harvesters. The Prince Edward Island Fishermen's Association (PEIFA) based in Prince Edward Island (PEI), the North of Smokey – Inverness South Fishermen's Association (NOSFA), the Gulf Nova Scotia Fishermen's Coalition (GNSFC), the Gulf Bonafide Fishermen's Organization, Northumberland Fishermen's Association, MFU Local 4, and the 4VN Management Board all based in NS represent those harvesters fishing Atlantic Halibut in division 4RST and were all a part of the decisions made in this document.

The Southern Gulf holds a total of 2,265 groundfish licenses divided among Nova Scotia (NS): 737 licenses, Prince Edward Island (PEI): 872 licenses and New Brunswick (NB): 656 licenses. This equates to 56% of all groundfish license holders in the 4RST and yet these three provinces receive only 10% of the allotted quota for the Southern Gulf. The groundfishery has always been a vital element for all three provinces and has provided an important revenue stream for fishers.

Discussions between all previously mentioned groups have been ongoing since the announcement of the "review of allocation decisions that have taken place since 2007 in the Gulf Atlantic Halibut Fishery" and decisions from those talks are summarized in this document.

***ALL SEVEN (7) HARVESTER GROUPS FROM NOVA SCOTIA AND PRNCE EDWARD ISLAND AGREE THAT THE SHARING ARRANGEMENT SET FORTH IN 2007 FOR ATLANTIC HALIBUT IS UNJUST. WE REQUEST THAT THE DECISIONS MADE IN 2007 BE RE-VISITED AND A MORE EQUITABLE PROCESS BE PUT IN PLACE.

Past History

Recommendations were made on March 30th, 2007 during the Consultative Meeting - Geographical Fleet Shares 4RST/3NO Atlantic halibut in Moncton, NB regarding methodology that was under consideration to determine the sharing arrangement. As stated in the minutes the following 14 organizations in attendance suggested that methods other than exclusively using historical landings be used.

- 1) Le Regroupement des Pecheurs Professionnels du Sud de la Gaspésie Inc.
- 2) Regroupement des Pecheurs Professionnels du Nord de la Gaspésie
- 3) Association des pecheurs des Illes-de-la-Madeleine
- 4) L'Association des morutiers Gaspésiens et L'Association Capitaines
- 5) L'Association des morutiers traditionnels de la Gaspésie

- 6) Regroupement des Associations de Pecheurs de la Basse Cote-Nord
- 7) Regroupement des Palangreiers at Petoneliens uniques Madelinots
- 8) Regroupement des pecheurs professionnels de la Haute et Moyenne Cote –Nord
- 9) Union Pecheurs des Maritimes (Eastern NB)
- 10) North of Smokey – Inverness South Fishermen’s Association
- 11) Maritime Fishermen’s Union
- 12) The Federation of Gulf NS Ground Fishermen and Inverness South Fishermen’s Association
- 13) FFAW
- 14) Prince Edward Island Fishermen’s Association

During this meeting it was documented by six of the attending organizations that the dates proposed for the assessment should be revised because it included the cod moratorium which was in place from 1992 until 2004 and essentially shut the Southern Gulf Harvesters out of the fishery.

Prior to 2007, the competitive halibut quota was set at 250T, with 125T available until the end of June. The remaining 125T was available starting the 15th of July until the entire quota was caught. Due to the migration of the halibut, Newfoundland and Quebec were typically the first to begin fishing. Atlantic halibut were available in the northern Gulf earlier in the year. In many cases NL and Quebec would overrun the first 125t available and without penalty. NL & Quebec were able to fish the resource ahead of the other provinces and considerably build their historical landings numbers at the expense of others.

Recent History

The Total Allowable Catch (TAC) has increased to 1,036 MT in 2015 and recently another formula (other than solely using historical landings) was used. In 2010, increased TAC was announced by the Federal Minister of Fisheries, and this new TAC was distributed equally amongst the fixed gear fleets. Although this was not equal provincial shares, this arrangement opened the door for southern Gulf halibut fishermen to access slightly more halibut.

The abundance of the halibut stock has been trending in a positive direction over the past number of years as reported in the DFO Science Advisory Report 2013/14 on Atlantic Halibut in the Gulf of St. Lawrence. Indications are that this trend will continue with responsible management practices being followed. The increase in halibut populations in adjacent PEI and NS waters has also been documented by local fishermen for many years.


Recommendations

We have clearly documented in this response the injustice of the 2007 decision on the allocation of halibut shares. We request that the decision made in 2007 be re-visited and a more equitable process be put in place. This would include a decision that encompasses not only history, but the cod moratorium, adjacency and equity.

These recommendations will reconcile past inequities and allow all Provinces to move forward on a fair and consistent basis. It is critical that fishers in all geographic areas of the Gulf of St. Lawrence be economically viable and benefit from the increasing availability of this key resource.

Thank-you for your consideration,

Signed:

A handwritten signature in black ink that reads "Tony Carter". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Tony Carter
Chairman, Prince Edward Island Fishermen's Association: Groundfish Advisory

A handwritten signature in black ink that reads "J. LeBlanc". The signature is cursive and somewhat stylized, with the first initial being prominent.

Leonard LeBlanc
President, Gulf Nova Scotia Fishermen's Coalition, Gulf Bonafide Fishermen's Organization,
Northumberland Fishermen's Association and MFU Local 4

A handwritten signature in blue ink that reads "Robert Courtney". The signature is cursive and written in a darker blue shade than the rest of the document.

Robert Courtney
President, North of Smokey – Inverness South Fishermen's Association

A handwritten signature in blue ink that reads "Herb Nash". The signature is cursive and written in a darker blue shade than the rest of the document.

Herb Nash
President, 4VN Management Board