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July 11, 2018

To: National Advisory Panel on Marine Protected Area Standards

On behalf of the PEI Department of Agriculture and Fisheries, I would like to take this opportunity to provide our comments on Marine Protected Areas as it pertains to the fishing and aquaculture industries around Prince Edward Island primarily, and the Gulf of St. Lawrence and Atlantic Canada, secondly.

The seafood industry is vitally important to the economy of Prince Edward Island and the province derives the highest percent of its GDP from the seafood industry as compared to all other provinces. There are over 1,225 core license holders, with 8,500 people employed in the industry, generating over \$648 million (in 2017) into the provincial economy. They are multi-species license holders, earning their livelihood from lobster, snow crab, rock crab, halibut, tuna, herring, oysters, and scallops. In addition, there is a thriving and growing mussel and oyster aquaculture sector.

Based on the IUCN Guidelines for the establishment of Marine Protected Areas, Categories IV (Habitat/species management area) and VI (Protected Areas with Sustainable Use of Natural Resources) are most applicable in Canada's marine environment. Exploitation levels within these categories, which include appropriate gear types permitted, will vary based on the overall objective. For the process to be successful and meet the objectives of the MPA it is imperative that, early in the development process, consultation take place with the seafood sector and all appropriate stakeholders, such as First Nations. These groups can provide valuable input into the appropriate size, dimensions and restriction levels of a potential MPA.

The focus of PEI's fisheries is centered on lobster, snow crab and rock crab trap fisheries, all with two-month seasons. The nature of these fisheries is considered low impact on the habitat and resource. The aquaculture sector is also highly regulated and has minimal impact on the marine environment. As proactive stewards of their resources, the PEI seafood industry takes responsibility in the level of success within each sector.

The fishing and aquaculture industries is well represented province-wide organizations, which are highly active in promoting sustainability of each sector They provide and support the protective measures needed to ensure sustainable resources.

Our province's commercial fisheries are controlled through a suite of federal management measures such as length of season, gear type and sizes, minimum size limits, by-catch limits and number of licenses. These measures are conducive to protecting the greater portion of the ecosystem wherein over 1,200 PEI core fishers conduct their livelihood.

The aquaculture industry on PEI is also well regulated through a partnership between the federal and provincial governments with a rigorous regulatory environment.

Since the late 1990s, the Prince Edward Island commercial fishing community has led the initiative to preserve a portion of their waters to protect lobsters and other species around our province, commonly called buffer zones wherein no scallop dragging will occur. The aquaculture sector operates under a voluntary environmental code of practice that was developed with input from the provinces and industry.

Marine Protected Areas (MPAs) are designed to protect and enhance a portion of the marine ecosystem including its species, habitat and life processes. With a portion of the marine environment protected from human activities, the ultimate goal is for increased flora and fauna within a sustained, yet diversified, system.

The level of activity permitted within an MPA should be correlated with the overall objective or purpose of the MPA. If a Marine Protected Area is proclaimed to protect a specific habitat, such as coral reef, then certain activities such as rod and reel tuna fishing or mackerel hand-lining would be non-obtrusive in their respective fishing operations and the objectives of the MPA will still be met.

Rebuilding stocks is a specific goal that is often linked to the rationale behind creating MPAs. Albeit, one can look at the groundfish stocks in the Southern Gulf of St. Lawrence which, for many species, including Atlantic cod, white hake and American Plaice, basically has had a moratorium (in essence a total MPA) since the early 1990's, but has failed to yield any appreciable signs of growth in these species. Therefore, Marine Protected Areas should not be considered the ultimate management measure which will guarantee everlasting environmental sustainability. Rather, it is one fishery management measure which should be utilized when and where it is suitable under the principle of environmental sustainability.

The Province of Prince Edward Island is very much interested in the sustainability of the marine resources, including the socio-economic viability of the fisheries it provides. The following points should guide your Panel in the purpose or development of an MPA and determining the amount of human activity restrictions within an MPA:

- MPAs must be validated and reviewed on a regular basis to ascertain the continued integrity of the protected area.
- MPAs must prove their purpose, i.e., a net benefit to Canadians.
- MPAs must incorporate socio-economic and cultural aspects.
- MPAs should not create an environment resulting in a non-viable fishery or other marine industries.

- MPAs can provide a range of protection levels, whereby fishing may be permitted.
- MPAs should strive to be multi-purpose in protecting more than 1 species, and /or its habitat.
- MPAs could be time controlled, i.e., protecting sensitive (endangered or threatened) migratory species when present in the area.
- MPAs are more productive as several smaller spatial zones vs one large zone.
- MPA decision process should have a robust consultative process, with approval by user groups.

When the intended and unintended impacts are well understood, I recognize the concept of varying the level of human activity on a per site basis, as the purpose of the marine protected area will vary according to the species and/or habitat being protected. However, all impacts need to be fully explored and understood by all stakeholders. PEI would not support restrictions that would limit our ability to conduct a sustainable and environmentally responsible commercial fishery in the southern Gulf of St Lawrence.

It is the ultimate goal for fisheries' stakeholders to have an everlasting resource. MPAs can be one tool utilized to achieve this goal. Many artisanal fisheries, such as those in the southern Gulf of St. Lawrence, are currently maintained through decades of revisions of management measures.

In closing, I wish to thank the Panel for the opportunity to provide comments regarding the activities that may be permitted within a Marine Protected Area within Canada, and on the level of protection needed in reaching the stated objective of the protected zone. In your deliverables, you will be providing recommendations to the federal government. Keep in mind, while lines in the water may prevent fishing activities, they are permeable when it comes to an unfortunate event such as an oil or gas spill hundreds of miles away. The fishing industry may support the objectives of MPAs, but it is all for not if they are not protected from all industrial usages and risks.

I look forward to reviewing your report and its recommendations put forth to the federal Minister of Fisheries, Oceans, and Canadian Coast Guard.

Sincerely,



Robert Henderson
Minister