

Submission to the National Advisory Panel on Marine Protected Area Standards
From the BC Commercial Fishing Caucus
July 31, 2018

Introduction

The Commercial Fishing Caucus (CFC) is an open and broad based group of commercial fishing organizations and individuals working together on marine planning processes in BC. Our members include: United Fishermen and Allied Worker Union, Native Brotherhood of BC, Northern Native Fishing Corporation, Area A Crab Fishermen's Association, BC Longline Fishermen's Association, Area F & G Trollers, Area C & D Gillnetters, Area A & B Seiners, Prawn Caucus, Groundfish trawl, Shrimp, Tuna and other harvesters. Please see our website www.bcfishcaucus.ca for more details.

For some the creation of MPAs is an academic exercise with no direct consequences. Our member interests are intimately connected to the marine ecosystems along our coast; the creation, implementation and management of MPAs will directly and indirectly affect these interests. MPAs will affect incomes, livelihood opportunities, migration, ecosystem connections, and ecosystem knowledge. If constructed without fishers ecosystem knowledge they will reduce the ecosystem services provided to our coastal communities.

MPAs may also serve as a resource reallocation mechanism: conflict resolution and structural adjustment should be made available early in the processes. And MPAs will cause fishing effort to move, if this is not considered, any positive MPA effects could be negated elsewhere.

Over the last eight years, the CFC has hosted and participated in hundreds of meetings to discuss the various marine planning processes, including:

- Pacific North Coast Integrated Management Area (PNCIMA);
- Marine Planning Partnership (MaPP);
- Sgaan Kinghlas-Bowie Seamount MPA;
- Hecate Strait Glass Sponge Reef MPA;
- Gwaii Haanas, Southern Strait of Georgia NMCA;
- West Coast Aquatic Coastal Strategy;
- Northern Shelf Bioregion MPA network;
- Offshore AOI; and
- Scott Islands marine National Wildlife Area.

Through these processes, the CFC has built relationships with other stakeholders, communities and First Nations along our coast. We have been strong advocates for integrated marine management with consensus-based advice. We have our own agreed on Ecosystem Based Management (EBM) goals to guide our work.

When the IUCN MPA Guidelines came out in 1999 their aim for MPAs was to be a “key component of integrated management of [a countries] coastal and marine areas and as part of [a countries] sustainable development.” Science continues to identify integrated marine management as the best way to manage our marine activity sustainably (Begg et al 2015). Over the last 20 years almost every MPA created in Canada has been created in a silo, i.e. not within an integrated marine management framework. Unfortunately this trend continues with most of the current work to achieve the governments marine conservation targets set in 2015. The result is far from optimal with unintended consequences throughout our fisheries.

Most every MPA process we’ve been involved with has other key deficiencies: lack of robust stakeholder engagement; poor integration within and between government agencies; lack of conflict resolution; lack of resources to monitor and adaptively manage; consensus advice often ignored; no resources for structural adjustment; and generally poor communications with stakeholders.

Gwaii Haanas NMCA, run by the Council of the Haida Nations and Parks Canada, is by far the best MPA process we’ve been involved with. In this process the Haida brought their own social and cultural objectives into the process, and Parks Canada has worked hard on communications and engagement. The Hecate Straits Sponge Reefs MPA process, run by DFO Pacific Region, is the worst. In this process 7 years of collaborative advice was thrown out at the Canada Gazette II phase to accommodate loud special interests.

We realize that the ocean is important to more than just fishermen; indeed it is critical to all life on the planet. The ocean regulates temperature, without it we would burn during the day and freeze at night. It provides half of the oxygen we breathe. It provides over 30% of all the protein we eat. Over 1 billion people are employed directly in ocean activity. It is a key source of energy, oil and increasingly wind. It is the most efficient way to move goods and services around the planet. It is a most important tourism, recreation and spiritual place. And our ocean is identified with new sources of growth, jobs and innovation. Survival of life as we know it depends on the continuing good health of our ocean.

We believe a healthy commercial fishery is one of the best indicators of a healthy marine environment. Commercial fisheries are directly connected to natural productivity, and are arguably the most sustainable food production method on the planet. We do not have to water, plant, feed, fertilize, pesticide, de-rock, plow, weed, or replace existing ecosystems to harvest fish sustainably. Fisheries must be an integral part in any MPA network.

Long before the IUCN Guidelines were defined, fisheries managers were using spatial and temporal closures to protect marine biodiversity and fisheries. The FAO defines a marine protected area as “any marine geographical area that is afforded greater protection than the surrounding waters for biodiversity conservation or fisheries management purposes”. With this definition a countries entire EEZ could be categorized as an MPA. Indeed if a country has a strong marine regulatory framework, a fisheries management framework, and integrated marine management, biodiversity will be protected creating a unique marine protected area.

Unfortunately Canada lacks the integrated management regime contemplated in its Oceans Act (1997).

MPA Standards should include:

- transparent government commitments,
- collaboration with local and indigenous governments from planning, implementation, monitoring, to adaptive management,
- ongoing support for stakeholder engagement,
- measurable and understandable objectives,
- accountable decision making structure,
- recognition of an overarching integrated marine management framework,
- conflict resolution and structural adjustment resources,
- baseline data on the ecological, social, economic and governance dimensions,
- ongoing monitoring of the ecological, social, economic and governance dimensions, and
- regular review and adaptive management with all interests.

The IUCN has developed an existing structure to categorize marine protected areas. What do you see as the strengths and weaknesses of the IUCN Guidelines?

There is strength in the IUCN Guidelines in that they provide a set of categories with associated uses that are internationally recognized. Using these IUCN categories for the development of Canada's MPAs allows for international consistency, provides a common evaluation framework, and supports transboundary ecosystem protections. A weakness in using the IUCN Guidelines is they assume there are no existing measures to protect biodiversity. They don't take into account any existing laws, regulations, policies, resources, fisheries management, integrated management, or the level of activity in the countries marine estate.

The IUCN Guidelines recognize the need for a diversity of management approaches which is a good thing given the differing regulatory baselines in each country. What happens outside an MPA is critical to what happens within an MPA (Hilborn 2016). An IUCN 1a MPA surrounded by poorly regulated heavy marine activity will offer little biodiversity protection.

While there are strengths associated with the Guidelines, when MPAs are created outside of an integrated marine management framework they can and do exclude key socio-economic objectives. This will lead to unintended consequences in those dimensions and less durable results. The IUCN Guidelines alone do not capture the full potential of the positive social, economic and cultural benefits from marine activities, nor the negative consequences of alternative activities such as pesticides applied to grow food on land draining into the ocean. With these limitations, it will be difficult to maintain or improve coastal community stability, and meet goals 2 and 4 as outlined in the Canada - British Columbia Marine Protected Area Network Strategy (2014).

The ecological objectives of the IUCN categories will struggle to be met if socio-economic objectives are ignored. In a study of 27 international MPAs, the principal drivers of both success and failure were found to be contextual (e.g. governance, social, economic) rather than design (e.g. size) (Giakoumi et al, 2018). The exclusion of fishing community members, or the dismissal of MPA's role in fisheries management could create serious conflict between other user groups, like conservationists or recreational operators (Kelleher 1999; Hilborn 2016). The MPA network will rely on buy-in from coastal community members and fishers as they stand to take a large socio-economic hit (Hilborn 2004).

Overall, the Guidelines are based on the assumption that MPAs are an effective management tool. In practice, MPAs work best if existing fisheries management is not effective, and actually often fail to achieve increased conservation benefits (Hilborn 2016; Edgar et al. 2014). Edgar et al. (2014) found only 4 of 87 MPAs analyzed to be successful. All four of these MPAs were from small oceanic islands, with the common features of: no-take, well enforced, old (over 10 years), large (over 100 km²), isolated by deep water or sand (Edgar et al. 2014).

In addition, IUCN category MPAs will not protect marine ecosystems from various threats including climate change, ocean acidification, land-based run-off, oil spills, plastics, illegal fishing and aquaculture effluent (Edgar et al. 2014; Hilborn 2016). MPAs are generally positive for stationary or less mobile species such as sea cucumber, urchin, rockfish (Cullis-Suzuki and Pauly 2010; Hilborn 2004). However, they will serve an insignificant role for highly migratory species (i.e., salmon and tuna). Nesting MPAs inside integrated marine management is key for success.

Overall, do the Guidelines developed by the IUCN work well in the Canadian context?

Canada has already committed to using the IUCN Guidelines, in implementing it will come down to understanding and using our existing marine regulatory systems to fully protect what Canadians value. In context of BC, our coastal economy has been built around access to marine resources. With this, we are very concerned with using the IUCN Guidelines to silo MPAs and excluding socio-economic objectives from the discussions.

Moving forward with the Guidelines would create cascading impacts on fisheries and the value chain, as the objectives overlook the historic importance of fishing to coastal communities. If not done right MPA induced fisheries closures will displace fishers, move effort, increase pressures on coastal communities, small-boat independent fishermen, seafood consumers, and restaurants alike. Further fisheries closures will increase demand for other less sustainable food products, aquaculture and imported seafood from other poorly managed fisheries around the world (Hilborn 2013); undermining local food security, limiting choices for tourists, contributing to increased greenhouse gases, and poor ocean health.

Conclusion

For MPAs to be effective they must be placed inside an integrated marine management framework as contemplated with our Oceans Act (1997). The purpose of an MPA or MPA network should be made clear to all, and the objectives measurable. MPA development must consider existing management and marine planning landscape (e.g. PNCIMA, Integrated Fisheries Management Plans, Oceans Protection Plan, Marine Plan Partnership). MPAs alone are not the solution. They can be part of the solution when nested inside integrated marine management, along with sustainable fisheries management (Cullis-Suzuki and Pauly 2010).

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It is imperative that stakeholders and local communities be engaged in MPA processes from the beginning, as stakeholder engagement (and its absence) have been found the most important factor for determining MPA success or failure (Ban et al. 2009; Giakoumi et al. 2018). With this, we thank you for your consideration of our recommendations.

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