



Oct 20th 2014

MaPP Marine Coordinating Team
MaPP Sub-regional Co-leads

Via Email

Re: Commercial Fishing Caucus support for MaPP Initiative Plans

Dear Marine Coordinating Team and Sub-regional Co-leads,

As marine plans for the four MaPP sub-regions are completed the Commercial Fishing Caucus (CFC) wants to clearly state its support for these MaPP initiative plans. Our involvement in the marine advisory committees and other MaPP-related forums has been time well spent. As the plans go through approval by MaPP governments we want to signal our collective support for many of the elements contained in the plans including:

- The collaborative nature of the relationship between the Province and First Nations embedded in MaPP planning and the plans themselves.
- The approach of bringing diverse stakeholder groups together to build collaborative understandings of marine uses and activities in the four sub-regions, and together building a vision for a sustainable future ensuring coexisting ecological and human communities.
- Adoption of an EBM framework as a basis for future planning and management of marine area and resources.
- Recognition of the importance of community-based fisheries and seafood processing for supporting human wellbeing in coastal communities.
- Support for improvements to marine infrastructure throughout the region.
- The wealth of scientific and technical data as well as traditional and local knowledge brought together in one place.

These are complex, valuable tasks and are commendable. That said some challenges remain that need to be addressed through implementation including:

- The federal government (e.g., Fisheries and Oceans Canada, Transport Canada, Environment Canada, Natural Resources Canada) has not participated in MaPP and it's not clear how this will be dealt with in future planning and decision-making.
- A clearly articulated governance mechanism that includes collaborative engagement of stakeholders in future planning, implementation and decision-making.
- The identification of EBM indicators (e.g., human wellbeing, ecological) to be tracked for plan implementation.

- A clearly articulated conflict resolution process to support future planning and decision-making.
- The mapping of spatial zones (PMZs and SMZs) and the application of IUCN categories for PMZs in the absence of consideration of the full values associated with commercial fishing.

Spatial Zones

The CFC supports the use of spatial zoning as one component for implementing ecosystem-based management in the marine environment. Properly designed, spatial zones can help achieve desired ecological, cultural, social and economic objectives; reduce conflict and support monitoring and adaptive management.

However, the spatial zones (specifically PMZs and SMZs) included in the MaPP sub-regional plans pose a real challenge for the CFC. Notwithstanding the very clear clarification “All spatial recommendations in this marine plan provide policy guidance intended to inform the decision making process regarding uses and activities in the areas identified. The PMZs recommended in this marine plan are not designating marine protected areas (MPAs). The appropriate policy and legal instruments for achieving stated zoning objectives will be determined during plan implementation... Interpretation of the IUCN categories in the Recommended Uses and Activities Tables and / or zoning maps does not imply management direction for marine uses and activities outside of provincial regulatory authority. Additionally, identification of PMZs and the use of IUCN categories are not intended to predetermine the outcome of other related planning processes and should not be interpreted as such,” we remain concerned about future interpretation of the recommendations.

Our concerns are based on a number of considerations including the following:

- 1) Because the federal government did not participate in the MaPP process the spatial zones were developed without full consideration of their potential impact on commercial fisheries, as almost all the designated areas encompass important fishing grounds.
- 2) Given that the potential impact on commercial fisheries did not fully inform the design of the spatial zones, existing management practices associated with commercial fishing and local knowledge held by commercial fishermen did not adequately inform the designations.
- 3) Design and designation of spatial zones did not employ analysis of the four dimensions associated with marine analysis associated with commercial fishing: sea bottom, water column, sea surface, and timing. Consideration of these dimensions is a primary tool for conflict resolution in a marine context.
- 4) The MaPP plans anticipate that a future process that engages the federal government will address the interests of commercial fishermen. This is not certain. In addition, many of the PMZs are provided an IUCN category that will/may preclude commercial fishing. This may prejudice future decision-making given that First Nations and the Province have endorsed application of the categories.

Through the Marine Advisory Committees and various communications the CFC has consistently raised concerns in relation to the spatial zones. We are of the view that zoning in the MaPP plans should have been presented as defining areas of interest based on specific criteria (e.g., sensitive ecosystems, cultural features, habitat values, marine uses). This approach would ensure that the traditional and local knowledge, scientific data and other factors that inform MaPP spatial zones would be available for future planning (e.g., MPA networks) as contemplated by MaPP while limiting the opportunity for misinterpretation of the intent.

Other Implementation Priorities

The CFC has identified four other implementation priorities:

- 1) The CFC believes that work to develop meaningful EBM indicators for each of the sub-regions is a priority for implementation and that development of these indicators requires collaboration with stakeholders.
- 2) The CFC has pointed to the conflict resolution process developed by the West Coast Aquatic initiative (*WCA Marine Spatial Planning Framework Version 5, August 2013*) as an appropriate model to be used in a MaPP context. The CFC recommends that conflict resolution be incorporated during the implementation phase as a key plan element.
- 3) The CFC believes that a government-to-government governance framework can and should accommodate collaborative engagement with stakeholders. Designing a collaborative approach to planning going forward should be a priority for implementation.
- 4) For the CFC, and other interests, the absence of federal government involvement has posed a serious challenge. It is the federal government's regulatory jurisdiction with regard to fisheries that has led to removing commercial fishing recommendations from the plan and restricted the full consideration of fisheries in design of the spatial zones. Addressing this situation through implementation should be a key priority. The CFC is of the view that through implementation the focus on bringing commercial fishing more fully into the plans either by engaging the federal government or finding an alternative approach.

We look forward to working with MaPP governance partners and committees, and other stakeholders on plan priorities, and the opportunities and challenges posed above, as these plans move to implementation.

Sincerely,



Jim McIsaac
Coordinator

For the Commercial Fishing Caucus:

- United Fishermen and Allied Worker Union - Unifor
- Native Brotherhood of BC
- Area A Crab Association
- Northern Native Fishing Corporation
- T. Buck Suzuki Foundation
- BC Octopus Divers Association
- Canadian Sardine Fishermen's Association
- Area C Gillnet
- BC Longline Fishermen's Association
- West Coast Trollers Association
- Area B Seine
- Pacific Shrimpers' Coop
- BC Dogfish Hook & Line Industry Association
- Canadian Independent Fish Harvesters Federation