

Fish Food and Allied Workers – Unifor (FFAW-Unifor)

Brief to Standing Committee on Fisheries and Oceans

Study of the Impacts of the Reopening of the Cod Fishery in
Newfoundland and Labrador and Quebec

07/10/2024

Executive Summary

The following Brief is submitted by the Fish, Food, and Allied Workers Union (FFAW-Unifor) in response to the request of the Commons Standing Committee on Fisheries and Oceans for public input into its study of the *Impacts of the Reopening of the Cod Fishery in Newfoundland and Labrador and Quebec* as per the motion adopted by the Committee on September 16, 2024.

The FFAW-Unifor, representing approximately 14,000 workers, of which approximately 10,000 are inshore fish harvesters, addresses the reopening of the Commercial Northern Cod Fishery in Newfoundland and Labrador, emphasizing the critical role of the fishery in sustaining rural coastal communities, as well as the concerning disconnect between sitting government and the impact of their resource management decisions.

Key Points:

- **Economic Importance:** The fishery is vital for rural economic sustainability, employing more residents than any other sector in these communities. The organization advocates for collaborative fisheries management to ensure long-term viability.
- **Historical Context:** The decline of the Northern cod stock in the late 20th century highlighted failures in fisheries science that ignored harvester input. Since then, FFAW has initiated various scientific projects to include harvesters in stock assessments.
- **Recent Developments:** The Northern Cod Stewardship Fishery, established in 2006, has seen significant improvements, with Spawning Stock Biomass increasing from 10,000-tonnes in 1995 to 342,000-tonnes in 2024. The fishery received a Grade A rating from the Sustainable Fisheries Partnership for its sustainability efforts.
- **Management Recommendations:** FFAW has consistently advocated for the allocation of the first 115,000-tonnes of total allowable catch (TAC) to the inshore sector and Indigenous groups. This commitment is rooted in historical precedents and reinforced by modern legislation prioritizing socioeconomic considerations.
- **Concerns Over Offshore Fishing:** FFAW opposes offshore otter-trawling during critical spawning and overwintering periods, citing sustainability concerns and potential setbacks to cod recovery efforts.
- **Future Outlook:** The 2J3KL Northern cod fishery should return to a Stewardship Fishery until the stock has rebuilt to meet the 115,000t threshold to uphold the commitment to NL inshore and Indigenous groups and withstand the fishing pressure of Canadian and international offshore draggers.

In summary, FFAW-Unifor's Brief herein underscores the necessity of integrating harvester knowledge into fisheries management particularly for the Northern cod stock, while advocating for sustainable practices that support community livelihoods and ecological health.

FFAW-Unifor

FFAW-Unifor is the largest private sector union in Newfoundland and Labrador with approximately 14,000 members. Of this, approximately 10,000 are owner-operator enterprise owners and crew members and approximately 3,000 of our members are employed in the seafood processing sector.

FFAW-Unifor is primarily focused on rural, coastal economic sustainability. We have members in over 450 communities in every region of Newfoundland and Labrador. Most of our members live in small communities of 500 or fewer people. Many of these communities have existed for centuries and almost all were founded because of the fishery. Without exception, the fishery has and always will be the essential economic driver of small coastal communities in NL.

As the Union representing commercial fish harvesters, FFAW-Unifor is the primary advocate for the economic and social growth and sustainability of coastal communities and community-based fisheries in the province. When we engage in matters of fisheries science, fish prices, or policies, our work has an importance beyond the technical aspects of license conditions and opening dates. Rather, we are engaged in community building and planning. The future of the fishery is the future of these communities.

The Importance of Harvester Participation in Fisheries Management

The federal government has a critical and distinct role in the fishery – determining management plans and quotas. Every year, millions of dollars in federal tax revenue is derived from the industry from fish harvesters, plant workers, processing companies, and related industries.

The inshore fishery, and the jobs created as spin-offs from the industry, have always been the driver of rural economic development in Newfoundland and Labrador, employing more residents of rural communities than any other sector. As primary stakeholders, fish harvesters have a vested interest in the health and long-term sustainability of commercial fish species.

FFAW-Unifor has long advocated for a collaborative approach to fisheries science and management to ensure that these resources provide for the long-term viability of fish harvesters, processing workers, and the communities in which they live. Therefore, our organization includes an in-house Science Department that directly involves harvesters in the design, collection, and evaluation of fisheries science surveys and projects.

Fisheries Science and Historical Lessons Learned

Inshore fish harvesters warned of the decline of the Northern cod stock in the late 80's and early 90's, years before fisheries science caught up. By that time, the stock was devastated and coastal communities in Newfoundland and Labrador were irreparably harmed.

Work has been done in the subsequent years to include harvesters and improve data collection and stock assessment. Information from inshore harvesters was not considered in stock status assessment and management prior to the moratorium, which has been repeatedly highlighted as a critical failure post-moratorium. The FFAW-Science program began in 1994 with Cod Sentinel, which was designed in collaboration with DFO-Science, to ensure that changes in inshore fish abundance and distribution were tracked. As well, the Sentinel program was designed to help bring inshore harvesters and their knowledge to stock assessment processes.

Of course, Sentinel – like all FFAW-Science Programs – is much more than the data collected. As stewards of the resource, harvesters have played an important role in the last three decades, becoming active participants in research, stock assessments, and resource management discussions. Ideally, harvesters contribute to all stages of research, assessment, and management processes from on-the-water observations, identifying knowledge gaps, highlighting research questions of importance for the fishery, designing research programs and surveys to address those questions and gaps, and crucially evaluating and communicating results.

This is why FFAW advocates for harvesters' direct participation in fisheries science and assessment processes. Fisheries science is an applied science; having inshore harvesters and their knowledge at the assessment and management tables means harvesters can ground-truth the assumptions needed to build stock assessment models. As an example, many assessment models make assumptions about unaccounted for catch, including amounts lost to depredation and amounts caught by recreational fisheries. Without harvesters at the table, these assumptions are not sufficiently challenged nor made more defensible. DFO-Science and fisheries science more generally, need up-to date information on species shifting distributions, changes to recruitment and behaviour and on how the fishery is prosecuted to properly assess and understand the fisheries. Multiple harvesters, representing different fleets and working in different marine environments, bring that expertise and knowledge to the table.

Engaging in the DFO-Science assessment process and bringing forward alternatives to that process, reflects a commitment to strengthening the science and the resulting management decisions. DFO-Science and fish harvesters do not always agree, however, there should be commitment to hear and address criticisms. A science review process that does not acknowledge what harvesters have observed, recorded, and recommend is a process that seeks to diminish the credibility of harvesters' knowledge and narrows opportunities for their enterprises.

2024 marks thirty-two-years since the Northern cod moratorium, and for many the devastation is still fresh in their minds. It was harvesters who first raised the alarm on the depletion of the cod

stock, and it was government scientists who dismissed them. In the three decades since, our Union has committed to improving science by initiating dozens of surveys and other scientific projects – bringing information from fish harvesters to the science assessment table.

The Northern Cod Stewardship Fishery

Established in 2006, the Northern Cod Stewardship Fishery enabled a fishery by the inshore fleet and was limited to Canadian inshore fleets using handline, longline, and gillnets.

In the spring of 2015, FFAW-Unifor and the World Wildlife Fund launched the 2J3KL Stewardship Cod Fishery Improvement Project (FIP) in partnership with the Fogo Island Co-op and the Seafood Producers of Newfoundland and Labrador (now known as the Association of Seafood Producers).

The FIP included a multi-step, multi-stakeholder process with the aim of improving fishing practices and management to establish the conditions to promote the 2J3KL cod stock to rebuild and either meet or exceed the Marine Stewardship Council standard for sustainable fisheries. In addition to the core fishery management and stock growth objectives, our FIP also includes commitments to take care of cod habitats, to give harvesters the tools and training for better handling of bycatch, and to improve monitoring of the recreational cod fishery.

In February 2024, FFAW-Unifor's 2J3KL FIP was awarded a Grade A by the Sustainable Fisheries Partnership (SFP) – an internationally recognized seafood sustainability grading system.

An 'A' progress rating is reserved for comprehensive FIPs that have documented improvements in fishing practices or fisheries management within the last 12 months. FFAW's FIP demonstrated the commitment to sustainable fishing with documented improvements to cod habitats with, for example, over 16,000 pounds of lost gear removed from the Punch Bowl cod fishing ground in Labrador.

These grade rankings are something the sustainably minded consumer looks for when shopping for seafood all around the world and is a testament to the progress made by inshore fish harvesters in our province to turn the Northern cod fishery in Newfoundland and Labrador into a world-renowned, trustworthy, and sustainable source of seafood.

The Stewardship fishery prioritized rebuilding of this stock, and the limited fishery saw an increase in Spawning Stock Biomass (SSB) from 10,000-tonnes in 1995 to 342,000-tonnes in 2024, evidencing the continued commitment and work by inshore fish harvesters to build a sustainable and healthy fishery.

Recent Background and Context on Recommendations for Management of the Northern Cod Stewardship Fishery

If managed responsibly and collaboratively, Northern cod represents a significant opportunity for a viable and sustainable fishery of the future. The inshore sector of our province had been heavily engaged with DFO-Science within the Rebuilding Plan for Northern cod. The stock has grown from a SSB of less than 10,000 to close to 400,000-tonnes – a 40-fold increase.

In 2019, the stock assessment indicated that the SSB was 397,000-tonnes, which was about 50% of DFO's Limit Reference Point (LRP) for the stock. The assessment also indicated that low fishing mortality rates remained low and averaged 0.02 over the past five years. A full stock assessment was set to take place in Spring 2020, but because of COVID-19, only a stock status update was completed.

The 2J3KL cod assessment occurred at the end of March 2019 and found:

- Northern cod abundance increased over the last year but remains in the critical zone.
- SSB remains in the Critical Zone in 2019 and is now at 48% of the LRP.
- Estimated natural mortality for fish aged 5 and above declined from higher levels in 2017 to a value similar to the 2012-16 average.
- Estimated fishing mortality remains low for fish aged 5 and older.
- SSB for 2019 is greater than was projected during the 2018 stock assessment.
- This improvement is largely due to a better understanding of mortality from 2017.

The update did not consider important data that was available from the regular assessment model or cod tagging undertaken in 2019. Information provided in the status update and previous assessments, however, did make clear that a modest increase to fishing would have no impact on the overall stock trajectory. DFO-Science's subsequent Management Plan was released in July 2020, revealing a rollover in the total allowable catch from 2019.

In December 2020, the Rebuilding Plan for 2JK3L Cod prepared by DFO-Science was released. The approach outlined in the Plan was considered a major setback for the development of a sustainable cod fishing sector in rural Newfoundland and Labrador by fish harvesters. The Plan was developed and launched without any recent consultation with harvesters, or the sector in general. Since the moratorium, harvesters have worked closely with DFO-Science for co-management, and it was evident in the Plan that those efforts had been failing.

Large parts of DFO-Science's stock survey were not completed in 2021, and DFO subsequently cancelled the Northern cod assessment just a couple weeks before it was set to take place. DFO-Science claimed there was not enough data to proceed with an assessment, however two out of three areas were completed by DFO-Science for the stock. The Sentinel Survey, carried out by inshore fish harvesters, was entirely completed in 2021. Over thirty survey stations provided substantial data and combined with DFO-Science's RV survey results and natural mortality data for

other species, there was ample data to perform an assessment of the Northern cod stock.

Harvesters documented record catches and quality fish in the 2023 2J3KL Stewardship fishery, which forced an early season closure. The Maximum Allowable Harvest (MAH) was landed with record daily landings after the first few weeks of lower activity, related solely to the limited production capacity available to harvesters for cod.

For the past number of years, FFAW-Unifor have repeatedly recommended an increase the MAH and 2024 was anticipated to be the year when harvesters engaged in the Stewardship Fishery would finally see an increase in quota with DFO implementing a long-awaited new model for assessing the 2J3KL Northern cod stock. With the change to the LRP, and the movement of the stock from the Critical to the Cautious Zone, the Department will no longer be required to keep fishery removals at the lowest possible level. FFAW gathered necessary information to form a strong MAH increase recommendation that would benefit harvesters by extending the season with more fish available in the 2024 season.

With that important change to the LRP and amidst the various concerns of harvesters about the cod fishery, FFAW implemented a Northern Cod Working Group with harvesters to discuss issues and formulate ideas on the Northern Cod fishery in 2J3KL. This working group has taken harvester concerns and ideas to formulate proposals and resolutions to be brought to the larger membership. With a larger Stewardship fishery possible, harvesters were dedicated to ensuring that their recommendations were considered in future management decisions including MAH and Harvesting Plans, so that harvesters and can truly benefit from the adjacent resource that they continue to be dedicated to rebuilding since 2016.

On June 26th, 2024, DFO announced “*the historic return*” of the Commercial Northern Cod Fishery in Newfoundland and Labrador. The recent movement from the Critical to Cautious zone, was enough to convince Fisheries Minister Diane Lebouthillier to give the green light to re-establish a Commercial Fishery with an allocation to offshore draggers. Though the Canadian Quota is 95% of total removals, 6% was allocated to the Canadian offshore, and the remaining 5% to international offshore.

In April 2024, FFAW issued a formal letter to Minister Lebouthillier after becoming aware of proposals for offshore otter-trawling during the winter, which coincide with pre-spawning and spawning periods in 2J, and more broadly for the 2J3KL cod stock. FFAW vehemently opposed any offshore trawling activity on the 2J3KL cod stock due to well-supported sustainability concerns as it continues to rebuild. It is important to emphasize that catch rates in the offshore trawler fishery were the last to drop prior to the collapse because they were fishing on overwintering (pre-spawning) and spawning aggregations – when they were trouncing the remnant of the Northern cod stock.

In our letter of April 4, 2024, to the Minister which had all seven NL Members of Parliament cc’d,

as well as William McGillivray, Regional Director General, FFAW warned that Northern cod is rebuilding and can only continue to rebuild if past mistakes are not repeated. Reopening an offshore fishery as soon as it enters the Cautious Zone is an unconscionable and grave mistake.

FFAW-Unifor expressed adamant opposition to “reopen an otter-trawl fishery” in 2J as such a decision not only undermines the sustainability and growth of Northern cod, but further undermines the decision-making integrity of Fisheries and Oceans Canada and the current Liberal government for resource management. FFAW strongly encouraged consultation to discuss how prohibiting offshore otter-trawling during pre-spawning and spawning periods for 2J cod is a responsible approach.

It was particularly frustrating for federal government to proclaim that the Northern cod stock had been in the cautious zone since 2016, because in the [2021 Stock Assessment](#) stated that the 2J3KL Northern cod stock was in the critical zone and that “*the prospects for cod stock growth appear limited.*” Further, the “*historic return*” of the fishery was actually a medium-sized increase from 13,000-tonnes in 2023 to 19,000-tonnes under the “*re-opened*” fishery and only created a couple more days of work for inshore harvesters. It was the offshore that benefitted entirely from the increase in quota.

FFAW-Unifor’s Recommendation for the 2024 2J3KL Management Plan

On February 27, 2024, in consultation with the Northern Cod Working Group, FFAW submitted its recommendations for the 2024 2J3KL Management to the attention of Julie Diamond, Regional Manager: Groundfish, International Fisheries & Species at DFO. Below is the text from this submission:

FFAW-Unifor’s position on access and allocation for 2J3KL cod remains the same as historically recorded, with the first 115,000-tonnes being allocated to the Inshore Sector and Indigenous Groups. The Union representing all 2J3KL cod harvesters will under no circumstances support DFO renegeing on this longstanding commitment.

Not only is this the FFAW’s position, but this has also been the documented position of the Federal Government for decades, most recently in 2021 within the Department’s Integrated Fisheries Management Plan:

“When a total allowable catch (TAC) for Northern (2J3KL) cod is established, the first 115,000-tonnes of directed Canadian access will be allocated to the inshore sector and Indigenous groups in Newfoundland and Labrador. At a TAC level less than or equal to 115,000 tonnes, directed fishing activity will be limited to inshore harvesters and Indigenous groups in Newfoundland and Labrador.”

The concept of first priority in allocation of the TAC to the inshore sector was repeatedly stated in 1977 to 1980 by then Minister Romeo LeBlanc:

“I have a bias for the inshore fisherman not because of some romantic regard, not because of the picture on the calendars, but because he cannot travel far after fish, because he depends on fishing for his income, because his community in turn depends on his fishery being protected.”

At the Special Government Industry Seminar on the management and allocation of Northern Cod in Corner Brook in August of 1979, then Minister of Fisheries and Oceans, the Honorable James McGrath stated:

“The Northern Cod were the staff of life to the people of Northeast Newfoundland and Labrador... that the policy of the government was that the inshore fisherman had first call on this resource” (Lear and Parsons, 1993).

From 1982 to the time the moratorium was called, the inshore 2J3KL fixed gear fleet was allocated a portion of the TAC that equated to 115,000-tonnes. It is quite clear that from 1982 onwards, the inshore sector had priority access to the first 115,000-tonnes – and that is documented in quota tables pre-moratorium and in the Department’s own approach to fisheries management in the time since. This is more than a political commitment from the Minister-of-the-day. **It is a more than 40-year commitment that speaks to the Department’s recognition that the inshore sector in this province has a reliance upon and a commitment to the Northern Cod fishery.**

We kindly remind you of modernizations to the Fisheries Act made in 2019, which prioritizes the owner-operator fishery and socioeconomic considerations of adjacent communities. While we were certainly dismayed to see decisions made contrary to this Act in the recent Unit 1 Redfish allocations, we are hopeful the right decision will be made with Northern Cod.

Since the stewardship fishery began in 2006, inshore harvesters have been and continue to be stewards of the Northern cod resource, taking the care to grow this stock out of the critical zone and into the cautious zone. They’ve invested time and money in sustainable fishing gear and technology, and in quality handling techniques to ensure that the cod fishery of today is not the cod fishery of our past.

Moreover, the Fishery Improvement Project for Northern Cod just received an “A” rating from international NGOs. This means inshore harvesters have demonstrated an ongoing and continued commitment to improving the sustainability of this stock. This ranking also recognizes on-the-water, regulatory and research commitments.

Introducing offshore draggers at this important period of continued growth would not be beneficial

for the stock's continued recovery. Based on historical data, Northern Cod are highly aggregated along the shelf edge in January and February, which is why the offshore fleets targeted these dense overwintering and pre-spawning aggregations prior to the cod collapse.

These fish are tightly packed and extremely vulnerable. Historically, researchers used a lower catch rate limit of 1.5-tonnes per hour to identify commercially significant concentrations. These catch rates show how densely packed and vulnerable cod are at this time of year and that is something that must not be targeted during the rebuilding period.

The inshore fleet has tremendous capacity to land fish, and we do not need to introduce new capacity to this fishery. In 2023, the MAH for the 2J3KL stewardship fishery was 12,999-tonnes. In just four weeks (three summer, one fall), inshore harvesters landed 9,114-tonnes or 70% of the MAH, with the remainder spread out over seven additional weeks. That's an incredible capacity to land fish, especially considering the crab fishery was still open during three of those four weeks and harvesters were restricted by a weekly landing limit as part of the Conservation Harvesting Plan.

Further, catch rates were so good that harvesters were fishing much fewer than their maximum number of nets. For example, inshore harvesters were allowed between nine and 15 nets for most of the season in 3KL, yet most fished just three to five nets and still managed to land over 9,000t within four weeks.

2023 was not an anomaly. The stewardship fishery in 2022 brought similar results, with 70% of the 2J3KL quota landed in a four-week period. The capacity to catch fish within the inshore sector in Newfoundland and Labrador is enormous and offers great potential for the economic future coastal communities in the province.

Harvesters have been devastated by the downturn in multiple fisheries in recent years and rightfully see cod as an opportunity to diversify their enterprises and make a living fishing a longer season. Our harvesters now have vessels in a variety of sizes and capabilities, some of which will benefit from the closeness of the stock within the summer months, while many others have ample capability to fish further offshore during the fall season. NL harvesters can have a lengthy fishery, making frozen product available all year round, without the need to target spawning and pre-spawning aggregations.

Newfoundland and Labrador has a 500-year history of commercially harvesting Northern Cod, and the fishery continues to be critically important to inshore fish harvesters and processing plant workers in our province. There is a vast amount of economic development that is happening in our small coastal communities with inshore fisheries, and as we continue working for rural economic sustainability, the value of these fisheries and their capacity to directly employ tens of thousands of people should not be understated.

Now is also the time to step up monitoring and enforcement of the so-called recreational fishery. On average, landed recreational fish are 50 or 60 cm in length - which is notably longer than what commercial harvesters record during cod tagging by our at-sea technicians. This is evidence of high-grading happening at-sea.

We are in support of a provincial food fishery; however, many recreational fishers are doing so to create a black-market local fishery, with limited enforcement and monitoring to deter. FFAW-Unifor does not support the current petition to the House of Commons to expand the recreational fishery. We are adamantly against, is unregulated removals and a semi-commercial fishery by unlicensed harvesters. Landings from the food fishery must be monitored and enforced.

FFAW-Unifor maintains that current by-catch limitations on Northern cod should remain the same, as increasing by-catch limitations puts more unnecessary pressure on the stock. Any harvester or group should be focused on targeting their directed species.

In closing, we are reiterating the importance of the commitment for the 115,000-tonne to the inshore sector. Our Union vehemently rejects any attempts to undermine this commitment. The historic paper trail backed by our commitment to a sustainable fishery and capacity to harvest at significantly higher levels leaves no room for debate.

History of the 115,000t Commitment to the Inshore and Indigenous Groups

The commitment to a 115,000-tonne allowance allocated to inshore harvesters in NAFO divisions 2J3KL is clear and consistent throughout groundfish management plans of the 1980s, before the stock entered moratorium. Securing this commitment was a shared effort between the provincial government of Newfoundland and Labrador and the federal department of Fisheries and Oceans.

The commitment to ensuring the inshore allowance of 115,000-tonnes was maintained was first made by the Peckford government, during his time as Premier of Newfoundland and Labrador. The announcement took place at the Corner Brook Northern Cod Seminar in August of 1979, held at the Glynmill Inn, Corner Brook, Newfoundland and Labrador.

In making this decision Peckford stated,

Over the last number of years, corporate and other interests in mainland Canada have conducted an extensive lobbying campaign to influence the Government of Canada's policies in this regard. The result is that there appears to be great doubt in the minds of Federal bureaucrats as to the proper role of the Newfoundland inshore and longliner (or what might be called the middle distance) fleet. The balance is slowly but surely shifting to an emphasis on offshore trawlers. In

1979, for instance, only 56% of the Total Allowable Catch for these northeast cod stocks was allocated to the inshore fishery.

This can only mean disaster for our inshore fishermen and the many seasonal fish plants and communities which depend upon them. These policies must be reversed.

Peckford then went on to say, “It is the policy of my Government that about 85% of all Northeastern cod should be taken by our inshore and middle-distance fleet. This fleet is backbone of the economy of hundreds of small fishing communities”.

It was confirmation of a statement made by the Hon. Brian Tobin in 1978 at a speech to the St. John’s Board of Trade (HOA, 2015). Further, the Newfoundland and Labrador government agreed with projections for the stock made at the Seminar and recommended the inshore fishery always catch 85 percent of the total (GNL, 1980).

The allowance followed a 1976 change in approach to fisheries management. In a ten-year strategic plan, the Canadian government stated, “The guiding principle in fishery management no longer would be the maximization of the crop sustainable over time but the best use of society’s resources. ‘Best use’ is defined by the sum of net social benefits (personal income, occupational opportunity, consumer satisfaction and so on) derived from the fisheries and industries linked to them.” (Leblanc, 1976).

The allowance is evident in management plans of the pre-moratorium era, and inshore catches reached 115,000-tonnes in 1982 (Steele et al, 1992). The allowance was built around ensuring the principles of the department were supported.

Vardy and Dunne (2003) reiterate these principles that guided fish management during this period, and ones that still hold true today. They write, “In addition to increasing the inshore allowance the province sought to have the allocation principles established by the federal minister used to protect the interests of the Newfoundland fishery. The 1984 Atlantic Groundfish Management Plan identified the allocation principles as being adjacency to the resource, the relative dependency of coastal communities and the various fleet sectors along with economic efficiency and fleet mobility. The province had emphasized the adjacency principle, along with historical dependence, to ensure that Northern cod was harvested principally for the benefit of the Newfoundland industry.” The inshore allowance was a direct support mechanism for ensuring those who relied most on the resource were the ones to benefit.

Indeed, the Kirby Report (1982) had recommended an inshore allowance of 145,000-tonnes and is one of the first records to solidify this commitment in writing. Kirby stated that an allowance of 200,000-tonnes would be more in line with historical landings by the inshore fleet. The allowance was then confirmed at 115,000-tonnes. At the time of the moratorium in 1992, the offshore fleet

had been removed from the fishery at 120,000-tonnes (Steele et al, 1992).

While some have argued the inshore lacked capacity to harvest this amount due to low landings during this time, Lear et al (1986) and Blackwood (1996) put this argument to rest with the political and environmental realities of the stock at the time.

Blackwood states, “The result was that the inshore sector, which was promised priority in allocation and were supposed to get two thirds of the TAC was, by 1986, receiving only 43 per cent of the TAC as an allocation, and due to the low level of the stock and foreign harvest outside 200 miles was accounting for only 26 per cent of the total catch” (Blackwood, 1996, p. 53).

Similarly, Lear et al (1986) had earlier stated water temperature, lack of food availability and general lack of ecosystem productivity was responsible for the decrease in inshore landings. Further, in a report resulting from the Royal Commission on Renewing and Strengthening our Place in Canada, entitled “New Arrangements for Fisheries Management in Newfoundland and Labrador,” David Vardy and Eric Dunne backed up Blackwood’s assertions.

When referring to the inshore’s declining catches in the 1980s, Vardy and Dunne state, “The reason for this was that the biomass had been overestimated and the ability of inshore vessels to harvest a declining resource fell far short of the technical capacity of the offshore fleet to home in upon a shrinking biomass. The inshore allowance itself did not protect the stock or those who depended upon it as had been hoped.”

In 1994, Richard Cashin chaired a task force on incomes and adjustment in the Atlantic fishery. In a subsequent article in the Financial Post (1994), it is stated that, “In his task force report, Cashin cautioned the return of a directed offshore cod fishery. On this point, Brian Tobin seems to agree. Both Tobin and Cashin have tossed out the figure of about 115,000-tonnes, a level the Northern cod quota would have to reach before the offshore could return to those fishing grounds.”

Further confirmation of the allowance was made by senior DFO official David Bevan on March 13, 2008, during a presentation to the Standing Committee on Fisheries and Oceans. Referring to allocation policies, Bevan stated, “That policy was put in place as we made significant decisions, for example, on 2J3KL cod. The first 115,000-tonnes go to the inshore and the remainder would be shared between the inshore and the offshore.” (SCOFO, 2008).

Prior to the 2015 federal election, FFAW-Unifor submitted a questionnaire to each of the political parties requesting their responses to several questions. The 115,000-tonne inshore allowance was one of the key questions on the questionnaire. The Liberal Party of Canada reaffirmed their commitment to this allocation. The Party wrote:

A Trudeau-led Liberal government will re-affirm the federal commitment to allocate the

first 115,000 MT of Northern cod quota to the inshore harvesters so that, as the resource rebounds, the benefits of a future cod fishery flow to inshore harvesters and coastal communities.

The Liberal Party of Canada knows that we must be diligent and ensure that a resource rebound is real and sustainable, but when the stock achieves the proper threshold, we are committed to the policy that the first 115,000 MT will go to the inshore fleet.

We understand the fundamental importance of the cod fishery to Newfoundland and Labrador, and the importance of this commitment after the devastating effects of the cod collapse, which saw the largest layoffs in Canadian history. We must ensure that the future benefits of the cod fishery flow to the inshore harvesters and coastal communities, with spinoff benefits throughout the province.

In July 2016, then-Minister of Fisheries and Oceans Dominic LeBlanc held up the Liberal Party's commitment. Minister Leblanc ensured the inshore harvesters of Newfoundland and Labrador that the federal Liberal government continue to support ensuring the first 115,000-tonnes of Northern cod remain for inshore harvesters. **This commitment has been re-stated and reiterated throughout the tenure of the Trudeau government until 2024.**

RECOMMENDATIONS

Based on the above, FFAW-Unifor recommends the following:

- (1) The Department of Fisheries and Oceans must immediately revert the management plan for the 2J3KL Northern cod stock to a Stewardship Fishery model and rescind access by Canadian and International offshore dragger fleets.**
- (2) The Government of Canada must uphold the longstanding 115,000-tonne commitment for priority allocation of Northern Cod to Newfoundland and Labrador inshore harvesters and Indigenous groups when the stock has rebuilt enough to meet this threshold without risk to sustainability.**
- (3) The Department and Fisheries and Oceans must formalize a system of harvester participation and input into all aspects of fisheries management for the 2J3KL Northern cod stock.**

References

Blackwood, Glenn. 1996. "Past and Future Goals and Objectives in the Allocation of the Northern Cod Resource". M. A. Thesis, Memorial University, St. John's, NL.

Financial Post. 1994. "Fishermen caught up in Ottawa's Political Net." 21 May 1994.
Government of Newfoundland and Labrador (GNL). 1980. "Managing all our Resources: A Development Plan for Newfoundland and Labrador, 1980-1985." St. John's, NL.

House of Assembly (HOA). June 3, 2015. House of Assembly Proceedings. Vol. XLVII No. 2
Kirby, M.J.L. 1982. "Navigating Troubled Waters. A New Policy for the Atlantic Fisheries." Supply and Services. Ottawa, ON.

Lear, W.H., Baird, J.W., Rice, J.C., Carscadden, J.E., Lilly, G.R. and Aikenhead, S.A. 1986. "An Examination of Factors Affecting Catch in the Inshore Cod Fishery of Labrador and Eastern Newfoundland." Canadian Technical Report of Fisheries and Aquatic Sciences, No. 1469.

Leblanc, R. 1976. "Policy for Canada's Commercial Fisheries," Department of the Environment. Ottawa, ON.

Standing Committee on Fisheries and Oceans (SCOFO). March 13, 2008. No. 20, 2nd session, 39th Parliament.

Steele, D.H., Andersen, R. & Green, J.M. 1992. "The Managed Commercial Annihilation of Northern Cod." Newfoundland Studies 8:1.

Vardy, D. & Dunne, E. 2003. "New Arrangements for Fisheries Management in Newfoundland and Labrador." Royal Commission on Renewing and Strengthening Our Place in Canada. March 2003.

Respectfully submitted by Dwan Street, President-Elect of FFAW-Unifor
10. 07. 2024

Description of organization: Labour organization representing 14,000 workers in Newfoundland and Labrador, Canada, of which approximately 10,000 are inshore fish harvesters, and 3,000 are seafood processing plant processing workers.