

December 14<sup>th</sup> 2006.

To the Standing Committee on Fisheries and Oceans:

It is clear that from Paul Sprouts presentation before the Standing Committee on Fisheries and Oceans, October 21, 2006, he has presented this Committee with both fact and fiction. It should be noted that it is a fact the Department created the complexity that existed at the time of implementation of the Pilot Integrated Groundfish Pilot Plan. Every species of fish have been licensed under department's policy one by one. It is a fact that the DFO has required the discarding of species considered by-catch in the past. It is a fact, that though the discarded species are required to be recorded in logbooks, this is not considered reliable information. It is also a fact that the Department is also responsible for the Integrated Fishing Pilot, which greatly increases the complexity.

It is a fact that Under the Integrated Fishing Plan that the catch information, and by-catch information is more accurate. There is now a question as to what is the targeted species and which is the by-catch. Though Paul Sprout implied that without the Integrated Fishing Plan that the fishery would be shut down early. It is not clear from his presentation as to why, or what would trigger such an action, or to what fishery he was referring in particular, or to all fisheries.

It is a fact that some fisheries are continuing. Though the species of most concern was supposedly rockfish, it is the rockfish that is the predominant species of which the TAC (total allowable catch) has yet to be caught. The Halibut fishery has ended, the TAC of halibut has been, and continues to be exceeded, probably the first time in history. The sablefish fishery is early in it's new year and will continue through much of the winter months. The dogfish fishery and rockfish fishery is continuing and the DFO continues these fisheries, and allows access to next year's halibut quota for by-catch or targeting. This quota has traditionally belonged, or been available, to halibut license holders only. Now dogfish fishers, and rockfish fishers, have access to halibut and sablefish quota, whether it is available or not. So I ask again, the reason for Paul Sprouts prediction and reason for suggesting to this committee, that the fishery would have shut down early if there were no implementation of the Integrated Groundfish plan?

The management complexity has increased substantially since the implementation of this Integrated Plan. Individuals have benefited from this plan at the expense of others. Supporters of the plan are of course the benefactors. In almost every fishery those that hold one species licenses, target species, that wouldn't normally be encountered. Who are the benefactors and where do they sit; on all the Advisory Boards.

Fiction: that the Integrated Fishing Plan has anything to do with, or in anyway protects resources. It has presented industry with exceptional costs to which many of the industry participants cannot afford. It has reallocated fish inconsistently between license

holders leaving many who were dependent on a particular fishery completely unviable, while transferring the fishing opportunity to others. It has altered fishers fishing behavior, to the detriment of strong stable high value species, and putting them at risk with poor quality product, while claiming to be protecting resources, and claiming improved market price.

The necessity for those that have to cover encountered or targeted by-catch species have begun to inflate, and or will inflate, lease price to all fishers. I predict a significant increase in the lease price of halibut quota in the 2007 season, with less fish to catch, as a result of lower quota and over harvesting in 2006/7, winter fishery.

I would request that this Committee On Fisheries And Oceans do it's own independent review, or inquiry, into the Pilot Integrated Fishing Plan, it purpose, it's results in achieving that purpose, it's cost to industry, and the responsibility of government with respect to these costs. I would ask this committee to do an inquiry into the transfer of licenses and quota of Advisory Board members while sitting as advisors, with no code of conduct, in respect to conflict of interest, or responsibility to represent all industry participants.

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Fishing For Freedom