



October 1, 2022

Commercial Fishing Industry Participants:

Re: Northern Shelf Bioregion MPA Network Update

The Marine Planning Team is writing to provide you with an update regarding the Northern Shelf Bioregion Marine Protected Area Network (NSB). In December 2021 the NSB process, and release of the draft NSB Network Action Plan (NAP) was put on hold while DFO and the First Nations Partners consulted on issues of concern. It appears that an understanding between the parties has been reached and the draft NAP has been released for public consultation, involving surveys, open houses, and various meetings with interested parties including commercial fishing participants.

We previously advised that the focus of the NSB work has broadened to not only consider the protection of ecological and cultural features supporting sustainable resource management, but also to address reconciliation objectives of the Federal and Provincial governments and the First Nations partners. In other words, we believe moving the NSB forward is of high political value to the governments, especially the Federal government.

As a result of this political importance, the draft NAP has now been released for public comment, but the previously controversial elements of the NAP (all the management measures showing what is closed or what is open) have been removed. Rather, the management measures will be developed during implementation of the NAP. Of course, the MPT finds this to be very concerning for the following reasons:

1. Without knowing the management measures how can the public or affected parties provide meaningful input;
2. A socio-impact assessment has not been undertaken (because there are no management measures included) which also makes it difficult to assess the NAP and provide constructive feedback;
3. The NAP appears to lead towards more localized management and decision making which could have significant impacts on data collection, research surveys, and scientific assessments and analysis necessary for the ongoing sustainable management of the fishery resources;



4. The consultation approach being used will result in thousands of comments and ideas for improvements and there appears to be no process or method for assessing them or using them in a cohesive constructive and logical way to meet the overall objectives while minimizing and mitigating the impacts to commercial fisheries.

The MPT is also concerned that the industry's 2020 submission (in response to Scenario 1) has not been considered or incorporated in any meaningful way. The current draft NAP has "activities of concern" listed for each zone that mirror previous Scenario 2 management measures that were described as too complicated by DFO in their December 2021 letter. MPT analysis indicated that Scenario 2 would be devastating to commercial fisheries.

It is the MPT's view that the draft NAP as presented and the public consultation process undertaken will result in an NSB MPA Network that greatly reduces commercial fishing access, harms or shuts important industry infrastructure and has significant negative impacts on coastal communities.

The commercial fishing industry supports proper marine planning and reconciliation. However, reconciliation is a responsibility of all Canadians and the costs shouldn't be disproportionately borne by the commercial fishing industry because fish and marine resources are a means of achieving it.

If you are participating in any of the public consultations in October (in-person events listed on <https://mpanetwork.ca/engage/>) or are present at NSB meetings or presentations regarding the recently released NAP, the MPT encourages you to raise the four points above and ask why there is no clear plan that:

- Ensures the government compensates the industry for lost fishing access;
- Allows for an orderly transition that minimizes impacts to commercial fish harvesters, industry infrastructure and coastal communities.

Sincerely,

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