



Article 14 Submission

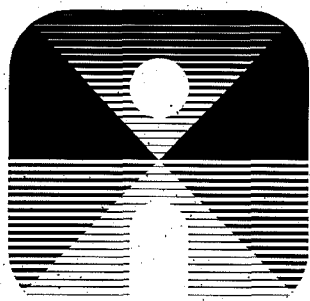
Made pursuant to the

North American Agreement on Environmental Cooperation

by the

Canadian Environmental Defence Fund

TABS I₁, I₂, I₃ ONLY



CANADIAN
ENVIRONMENTAL
DEFENCE
FUND

Making a case for the environment.

Office of the Minister
of Human Resources
Development



Cabinet du ministre
du Développement
des ressources humaines

Ottawa, Canada K1A 0J9

Dr. Irene Novaczek
Environmental Coalition of Prince Edward Island
126 Richmond Street
Charlottetown, Prince Edward Island
C1A 1H9

DEC - 6 1994

Dear Dr. Novaczek:

On behalf of the Honourable Lloyd Axworthy,
I wish to thank you for your letter of September 30, 1994,
concerning The Atlantic Groundfish Strategy (TAGS).
Minister Axworthy has asked me to respond to you directly.

TAGS is a coordinated and comprehensive initiative
designed to help revitalize Atlantic Canada. The goal of
the Strategy is to establish compassionate transitional
programs for the Atlantic fishery, that will lead to an
economically and environmentally sustainable Atlantic
economy.

TAGS is comprised of a number of components:
labour adjustment measures to assist clients with helping
themselves out of the fishery; adjustment measures and
fishery industry renewal to achieve the professionalization
of a new core fishery; and a sustainable economic
development component (Green Projects) for communities and
individuals affected by adjustment in the fishery industry.

Of these components, the only one with possible
environmental impacts is the Green Projects initiative.
These projects are designed to maintain or enhance the
environment and the approval process for all Green Projects
will include a thorough environmental assessment.

Mr. Jim Purves, an environmental assessment
specialist from the Department of Public Works Canada, will
be responsible for conducting these assessments. Copies
may be obtained from Mr. Dennis MacDonald, 99 Wyse Road,
P.O. Box 1350, Dartmouth, Nova Scotia, B2Y 4B9. Telephone:
(902) 426-5539, Facsimile: (902) 426-7090.

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- 2 -

As well, if you have any further questions on this subject you may contact Mr. Dave Hallman, Coordinator of the Green Projects Initiative, 4th Floor, Phase IV, Hull, Quebec, K1A 0J9, Telephone: (819) 953-1820.

I hope that this information is useful and I thank you for your interest in TAGS.

Sincerely,



Robert Thériault
Departmental Assistant

Minister of
Fisheries and OceansMinistre des
Pêches et des Océans

Ottawa, Canada K1A 0E6

JAN - 4 1995

Dr. Irene Novaczek
Environmental Coalition
of Prince Edward Island
126 Richmond St.
Charlottetown, P.E.I.
C1A 1H9

Dear Dr. Novaczek:

Thank you for your letter of September 30, 1994, regarding The Atlantic Groundfish Strategy (TAGS) in which you requested an environmental assessment of TAGS be performed. Please accept my apologies for the delay in responding.

I would like to begin by thanking you for your interest in the TAGS program, especially with respect to its relationship to the environment. I would like to assure you that the protection of the environment is a high priority of this government. The capacity reduction measures and labour force adjustment measures under TAGS are aspects of the federal sustainable fisheries program.

As you may know, TAGS is a comprehensive response to the groundfish crisis, offering flexible opportunities for fishermen, plant workers, their families, and communities to decide about their futures. It was developed by the federal government in partnership with provincial governments and industry stakeholders, and is jointly administered by the Department of Fisheries and Oceans (DFO) and the Department of Human Resources Development (HRD). TAGS is designed to provide income support and adjustment measures for those fishery workers whose livelihood was most seriously affected by the government's recent conservation measures that reduced groundfish quotas and closed certain fisheries.

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- 2 -

On April 19, 1994, my colleague, the Honourable Lloyd Axworthy, Minister of Human Resources Development, and I announced TAGS as a five-year, \$1.9 billion federal strategy. Of this amount, roughly \$1.6 billion is targetted to providing income support and various training and labour force adjustment measures to TAGS-eligible fishermen and plant workers. While DFO has some involvement in this process, particularly in the designation of eligible plants and the assessment of part of the eligibility criteria for fishermen, HRD has the main responsibility for final eligibility determination and the administration of all training and labour adjustment activities.

Of the original \$1.9 billion, some \$300 million is targetted for capacity reduction in the groundfish harvesting sector. On October 14, 1994, I announced the establishment of four regional Harvesting Adjustment Boards (HABs) which will develop and implement capacity reduction measures, including licence and early retirement programs for fishers. While these programs are not yet finalized, program details should be made public in the near future.

With respect to an environmental assessment of these capacity reduction measures, let me assure you that the goal of developing a fishery of the future which is both environmentally sustainable and economically viable has been paramount in the development of these capacity reduction measures. All industry stakeholders agree that the fishery of the future must be smaller and able to provide stable and long-term prospects for those it employs. The TAGS capacity reduction measures are a fundamental aspect of this industry renewal process.

I would like to assure you that environmental considerations were taken into account in the development of the capacity reduction measures under TAGS. An environmental assessment was done, but in a simplified form due to the urgency of getting the capacity reduction programs up and running, given the collapse of the groundfish sector and its effects on local economies. It is extremely important that fishermen be given the chance to make decisions for their futures now. The TAGS capacity reduction measures provide an opportunity for eligible groundfish licence holders to remove themselves from the fishery, thus, reducing the groundfish harvesting capacity associated with their commercial fishing enterprise.

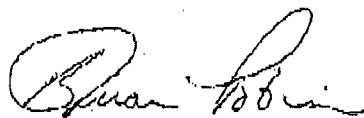
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- 3 -

With respect to information regarding the environmental assessments for Green Projects under TAGS, I have forwarded a copy of your letter and this response to my colleague, the Honourable Lloyd Axworthy, Minister of Human Resources Development, for his consideration.

Thank you very much for bringing your concerns on this important matter to my attention. I believe that, by working together, governments, industry stakeholders, and concerned citizens such as yourselves can develop workable solutions to the challenges of environmental sustainability and economic development in the Atlantic region.

Sincerely,



Brian Tobin

BT/mc

Attach.

c.c.: The Honourable Lloyd Axworthy, P.C., M.P.

IMPACTS AND EFFECTS

The TAGS capacity reduction measures are driven by economic concerns--to reduce the levels of participation and the associated harvesting capacity from the fishery. In this way, fewer numbers of people will be attempting to harvest the allowable groundfish catch. The Total Allowable Catch (TAC) will continue to be based on biological information regarding the resource, and not on the economic concerns of those who wish to harvest the resource.

All industry stakeholders agree that the chronic overcapacity in the groundfish harvesting sector must be reduced in preparation for the fishery of the future. In order to have a fishery which is environmentally sustainable and economically viable, the harvesting capacity of the Atlantic industry must be matched with the available resource.

The capacity reduction measures under TAGS are one way in which this sustainable harvesting level will be achieved. By reducing both the numbers of individuals in the harvesting sector and the accompanying harvesting effort of these individuals as represented by the vessel associated with their groundfish licence, movement is made toward this sustainable level of harvesting capacity. Also contributing to this reduction in capacity will be adjustments to the level of processing capacity (which falls under provincial jurisdiction), and Unemployment Insurance reform.

The level of Total Available Catch (TAC), or quota, for a given species is not affected by the TAGS capacity reduction measures; only the numbers of participants and levels of capacity which attempt to harvest this TAC.

It is expected that the Licence Retirement and Early Retirement programs will have neutral effects on the environment.

- 2 -

It should be noted that the Licence Retirement and Early Retirement programs under TAGS are voluntary. It is not known at the outset how many fishers will apply or be approved. As well as not knowing program take-up, it is also not clear as to the fleet sectors and geographic areas from which participation may come.

The effects of the capacity reduction measures are expected to take place over the medium to long term in the Atlantic fishery. The measures are being taken now so that the groundfish harvesting sector will be in a better position to match its harvesting ability with a sustainable resource once stocks recover.

Once fishermen have taken either Licence or Early Retirement under TAGS, they will have removed themselves from the fishery and will no longer receive income support or participate in adjustment measures under TAGS. The assessment of the environmental implications of activities undertaken by these individuals once they have left the fishery is not the responsibility of DFO, but will be covered by existing government policies and regulations.

The TAGS Licence Retirement and Early Retirement programs are expected to have a neutral effect on fish habitat and the marine environment.

Minister of
Fisheries and Oceans



Ministre des
Pêches et des Océans

Ottawa, Canada K1A 0E6

APR 12 1995

Mr. David R. Donnelly
Executive Director
Canadian Environmental Defence Fund
347 College Street
Suite 302
Toronto, Ontario
M5T 2V8

Dear Mr. Donnelly:

Thank you for your letter of February 6, 1995, regarding The Atlantic Groundfish Strategy (TAGS) in which you requested further information with respect to an environmental assessment done on policies and programs related to TAGS. Please accept my apologies for the delay in responding.

As you may know, TAGS is a comprehensive response to the groundfish crisis. It is designed to provide income support and adjustment measures for those fishery workers whose livelihood was most seriously affected by the collapse in groundfish resources. TAGS was developed by the federal government, in partnership with provincial governments and industry stakeholders, and is administered by the Department of Human Resources Development, with technical assistance from the Department of Fisheries and Oceans (DFO).

DFO is responsible for administering TAGS capacity reduction measures for the Atlantic groundfish sector, including the Groundfish Licence Retirement Program (GLRP) and an early retirement program for fishermen. The purpose of the GLRP is to reduce harvesting capacity through the permanent withdrawal of active groundfish licences. It is a voluntary program for those groundfish licence holders who meet certain requirements. It will provide these eligible fishers who choose to leave the fishing industry with financial compensation for permanently leaving the fishery.

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When TAGS was developed, its components were discussed and examined extensively by officials in DFO. After careful, but informal, consideration of the effects that this program would have on fish habitat and the marine environment, it was determined that the impact would be, at worst, neutral. This simplified assessment was in the form of an initial screening of environmental concerns as they related to TAGS. As this initial screening indicated a neutral impact, it was unnecessary to undertake further assessment. This is the usual practice under such circumstances.

Sustaining Canada's marine resources for future generations is a major priority for DFO. The initiatives that the government has undertaken to rationalize the Atlantic fishery are essential to the long term viability of the industry, while at the same time ensuring the health of the resource. The department continues to establish partnerships with stakeholders, throughout the Atlantic region, to ensure concentrated action and future success. To demonstrate this commitment, I recently convened a Roundtable meeting on the future of the Atlantic fishery. The results were extremely positive, with participants agreeing to work together towards the long term viability of the industry and the resource.

It is true that as long as groundfish moratoria remain in effect, the harvesting capacity associated with this sector is theoretical. However, when groundfish stocks recover sufficiently to warrant any or increased commercial fishing activity, it will be imperative to ensure that total allowable catches, quotas and fishing practices are fully oriented to conservation of the resource.

If there are any specific documents, such as reports or recommendations of the Fisheries Resource Conservation Council, which you would like to receive, I would be pleased to forward them to you. As well, I would invite you to provide any comments or information which you believe relevant to fishery resource conservation as it relates to DFO.

Please find attached the results of the initial screening for TAGS as it relates to fish habitat and the marine environment.

I would like to take this opportunity to wish you the very best in the future. Thank you for bringing your concerns to my attention.

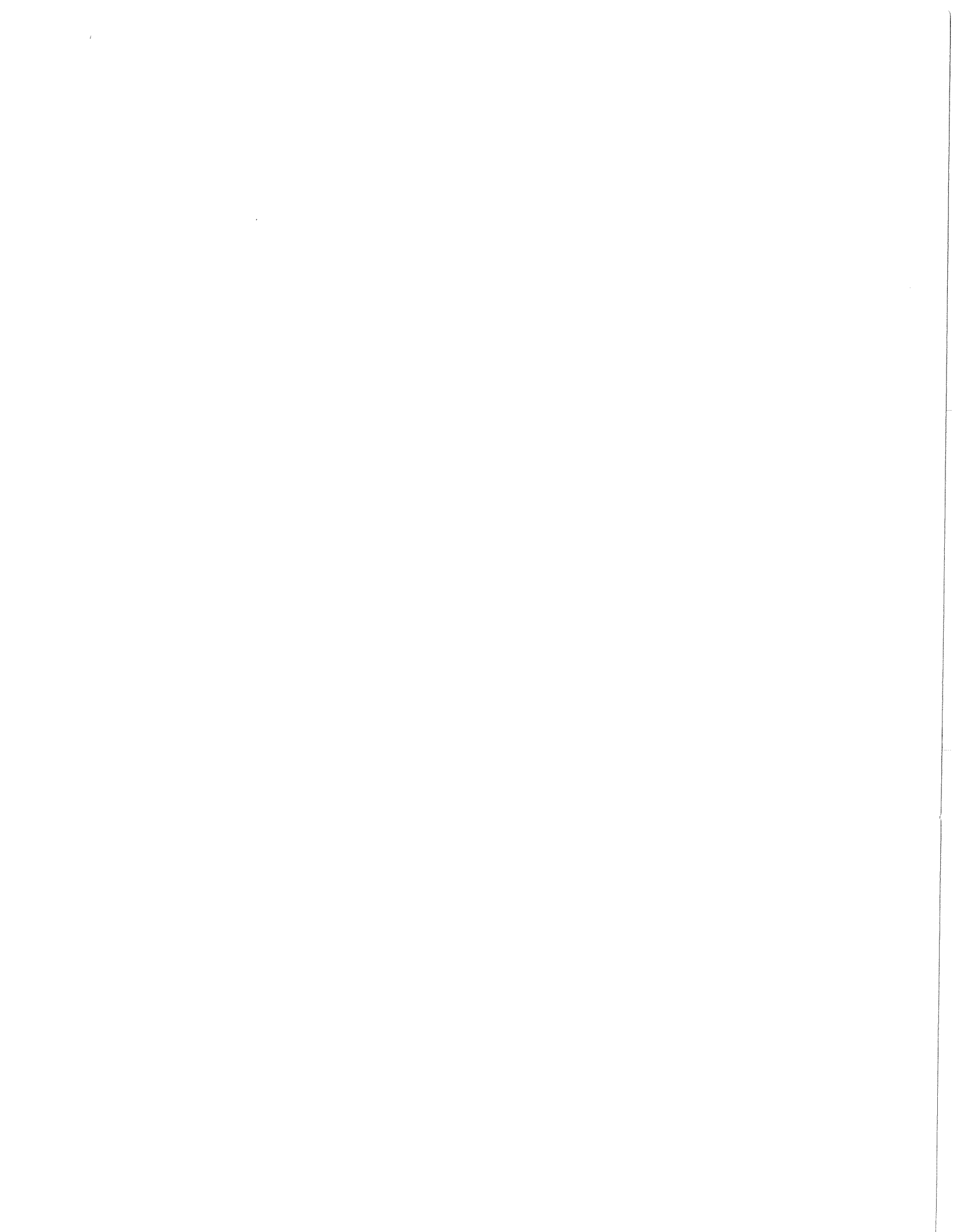
Sincerely,

A handwritten signature in cursive script, appearing to read "Brian Tobin".

Brian Tobin

BT/mc

Attach.



IMPACTS AND EFFECTS

All industry stakeholders agree that the chronic overcapacity in the groundfish harvesting sector must be reduced in preparation for the fishery of the future. In order to have a fishery which is environmentally sustainable and economically viable, the harvesting capacity of the Atlantic industry must be matched with the available resource.

The capacity reduction measures under TAGS are a means by which this sustainable harvesting level will be achieved. By reducing both the numbers of individuals in the harvesting sector and the accompanying harvesting effort of these individuals, in addition to the vessel associated with their groundfish licence, movement is made toward this sustainable level of harvesting capacity.

The TAGS capacity reduction measures are driven by the economic concerns to reduce the levels of participation and the associated harvesting over-capacity from the fishery. The Total Allowable Catch (TAC) will continue to be based on biological information regarding the resource, not on the economic concerns of those who wish to harvest the resource.

The level of Total Allowable Catch (TAC), or quota, for a given species is not affected by the TAGS capacity reduction measures; only the numbers of participants and levels of capacity which attempt to harvest this TAC.

Further contributions to this reduction in capacity will be made through adjustments to the level of processing capacity (which falls under provincial jurisdiction), and other reform. It is expected that the Licence Retirement and Early Retirement programs will have neutral effects on the environment.

It should be noted that the Licence Retirement and Early Retirement programs under TAGS are voluntary. It is not known at the outset how many fishers will apply or be approved. As well, it is also not clear from which fleet sectors and geographic areas participation will come.