

November 25, 2021

Dear Minister Joyce,

I'm writing to draw your attention to the ongoing uncertainty spot prawn harvesters face around the practice of tubbing. I am asking you to take swift action to consult and provide clarity to prawn harvesters who are busy making plans for the 2022 season.

As you may be aware, on March 3, 2021, the Pacific Prawn Fishermen's Association sent an email to harvesters stating that they were "recently informed by DFO Prawn Manager Laurie Convey that the Conservation and Protection Branch has deemed the practice of tubbing prawn tails illegal as it does not meet their interpretation of the conditions outlined in the Fishery General Regulations; any vessel found tubbing tails would be found in violation and charged."

This reinterpretation just a couple of months before the opening of the fishery led to a great deal of confusion and panic amid the public and the industry. Harvesters begged for clarity, and at minimum for a delaying of this change to accommodate an already extremely stressed industry but were met with silence or refusal. Petitions were circulated and many press stories drew the attention of the public and of MPs across Canada.

Two emergency sessions of the Standing Committee on Fisheries and Oceans attempted to expose a deeper understanding of the issue and concluded that there was no reason for the practice of tubbing to be banned. Among the resulting 14 recommendations to the Minister are the following:

- "4. Establish a standard tub size in consultation with industry that can be quickly and efficiently thawed for inspection by no later than 31 December 2021," and
- "10. Implement a timeline standard so that any regulation changes or reinterpretations must be announced no later than 180 days prior to the opening of the prawn fishing season.

The 180-day mark prior to the opening of the prawn season is right now. December 31st is just a month away. And yet harvesters have heard nothing from DFO about plans for tubbing in 2022. I'm sure you can imagine the anxiety this is producing. Harvesters' deadlines for ordering tubs and committing to pre-orders from their customers are bearing down upon them and they deserve to be informed as soon as possible about how their tubbed prawns can comply with regulations in 2022 and beyond.

Repeatedly we have heard DFO staff insist that they ARE consulting with and informing industry, but it appears they have only consulted with one organization, the PFFA, which represents licence owners while the vast majority of harvesters lease their licences and therefore receive no consultation or communication. This could readily be resolved under the current advisory board process by simply adding three seats to the current prawn advisory board: a representative from the Prawn Industry Caucus; the United Fish and Allied Workers' Union; and the Native Fishing Association. These three organizations can efficiently bring the concerns and perspectives of a much broader segment of the industry to the table and resolve the current and growing anxiety and animosity between industry and government.

Although I have not seen your mandate letter from the Prime Minister, I am sure it will contain something similar to Minister Jordan's mandate which stated that

Fisheries are a public resource that belongs to all Canadians. The Minister [...] has the mandate to conserve and protect the fisheries resource and to properly manage fisheries on behalf of all Canadians and in the public interest. In managing fisheries, the Minister may take into account social, economic, or other grounds in order to carry out social, cultural, or economic goals and policies.

Further, it mandated her to focus on

growing Canada's ocean economy to create good middle-class jobs and opportunities for ocean sectors and coastal communities, while advancing reconciliation and conservation objectives.

I know that we all share these objectives. A swift resolution to the confusion around the reinterpretation of the Fisheries General Regulation as it relates to the practice of tubbing prawns is a simple step toward achieving these objectives.

I look forward to hearing how the prawn tubbing issue is being resolved.

Many thanks,

Sonia Strobel (she/her)
Co-Founder & CEO