**Submission to the National Indigenous Fisheries Initiative Review**

From: Heiltsuk, Kitasoo/Xai’Xais, Nuxalk and Wuikinuxv Nations

Date: December 13, 2018

The Heiltsuk, Kitasoo/Xai’Xais, Nuxalk and Wuikinuxv Nations have identified the following opportunities to improve the AFS, and create a program that can assist the Federal government and the Department of Fisheries and Oceans in ushering in a new Nation-to-Nation relationship built on reconciliation and which honours the commitments under UNDRIP.

The Nations understand that this review is limited to the AFS program itself and as such we have refrained from raising concerns about the many ways in which DFO infringes on the Nations’ rights and title. However, it is important to acknowledge that improvements to the AFS program will only be successful if they occur in the spirit of reconciliation and with the intent of developing meaningful Nation-to-Nation relationships with respect to fisheries and oceans management.

**INCREASE AFS PROGRAM FUNDING:**

**Issue:** The budget for AFS and the related aboriginal fisheries programs in Canada have all remained stagnant since inception. This is despite inflation and increased costs in everything from staffing, office space, equipment and travel. In addition, the number of important issues that the Nations are working on has witnessed a significant increase since the program started.

**Recommendation:** Work with AAROM bodies to increase funding to levels that would allow the Nations to engage meaningfully in reconciliation-based programs. Increased funding would assist the Federal government in realizing their commitments to reconciliation and building Nation-to-Nation relationships.

**STREAMLINE REPORTING AND APPROVALS:**

**Issue:** Reporting is not consistent between DFO programs. In our experience, AFS appears to be significantly more onerous and paternalistic than AAROM. This has resulted in years of holdbacks and staff time focused on reporting rather than completing program work. As an order of government First Nations should not be required to so rigorously report to another order of government. There are many examples of Federal transfers that do not require such rigorous reporting. In addition, AFS programs and Nations should not be expected to bridge-fund programs because of holdbacks or delayed approval of contribution agreements. An example of this is Nations have on average of one year of total funding hold back leading to internal funding challenges.

**Recommendation:** Funding and reporting should be reflective of Nations being an order of government. Focus on long-term program funding provided in advance with minimal reporting that is consistent across DFO programs.

**CONSIDER THE RELATIONSHIP BETWEEN AFS AND AAROM AS NATION CAPACITY BUILDING PROGRAMs:**

**Issue:** As a program, AAROM has become adept at assisting Nations in collaborating on issues and projects where a collective approach creates efficiencies and improves effectiveness. Collaborative work under AAROM requires significant Nation-level input yet AAROM does not fund this engagement and Nations must use other-source funding to engage on AAROM-based projects. In many cases Nations are using AFS funding which could be put to other important Nation-specific programs.

**Recommendation:** Aggregate and Nation-level funding increases should occur in tandem and recognize the interconnectedness of the projects and programs being undertaken by AAROM and AFS.

**INCORPORATE INIDEGNOUS KNOWLEDGE INTO MARINE MANAGEMENT:**

**Issue:** It is the Heiltsuk, Kitasoo/Xai’Xais, Nuxalk and Wuikinuxv Nations’ experience that DFO is very resistant to integrating indigenous knowledge into management. This reluctance appears to be independent of whether this knowledge is anecdotal, the conclusion from a formal study, or validated through peer review.

In addition, DFO is reluctant to incorporate western science conducted by First Nations even if this too has been validated through peer review. DFO managers and DFO science do not own the patent on good ocean and fisheries science.

**Recommendation:** The AFS program should be supported through policy or government directive to develop more responsive fisheries management systems that include indigenous knowledge and First Nations led science.