Submission to the National Indigenous Fisheries Initiative Review

From: Central Coast Indigenous Resource Alliance

Date: December 13, 2017

The Central Coast Indigenous Resource Alliance worked with its member Nations, the Heiltsuk, Kitasoo/Xai’Xais, Nuxalk and Wuikinuxv Nations to identify the following opportunities to improve the AAROM, 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.

CCIRA and the Nations understand that this review is limited to the AAROM 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 AAROM 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 AAROM PROGRAM FUNDING:**

**Issue:** The budget for AAROM 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 issues that CCIRA and the Nations are working on has witnessed a significant increase since the organization was created. In 2017, there are many opportunities to utilize the AAROM program to implement reconciliation. These include:

* Implementation of fisheries joint management under the Coastal First Nations – DFO fisheries reconciliation agreement
* Implementation of ecosystem-based management and the Pacific North Coast Integrated Management Area Plan
* Contribution toward the 2020 target of protection 10% of Canada’s ocean space
* Implementation of the Oceans Protection Plan and the development of a world leading marine response system on the Pacific Coast

**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.

**UTILIZE AAROM AS A NATION CAPACITY BUILDING PROGRAM:**

**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. By contrast AFS has focused on individual Nation-level projects and programs where collaboration isn’t desired or necessary.

The result is that AAROM and AFS programs are doing important but unrelated work. However, collaborative work under AAROM requires significant Nation-level input and buy-in, yet AAROM does not fund this engagement and Nations must use other-source funding to engage on AAROM-based projects

**Recommendation:** Any increases in AAROM funding should be complemented by funding increases to support Nation-level engagement in AAROM based projects. This increase in Nation-based funding could occur through the AAROM program or as part of the Aboriginal Fisheries Strategy program.

**REPRIORITIZE AAROM AND DFO TO ENCOURAGE PROACTIVE ENGAGEMENT WITH NATIONS:**

**Issue:** Because of the insufficient staffing within AAROM bodies, First Nations communities (under AFS) and DFO departments, as well as a focus of DFO staff on engaging commercial fishermen at the expense of First Nations, the Nations’ relationship with DFO through AAROM is reactionary instead of proactive. In addition to there being over a dozen priority integrated fisheries management plans in the marine environment, there are issues with respect to shipping, marine planning, industry development, climate change, infrastructure needs, and aquaculture. The results is a scramble by Nations and AAROM bodies to respond to DFO’s request for feedback on marine-initiatives in a reactive manner, or Nations getting so frustrated with the state of affairs on a particular issue that they push DFO to react to critical issues on the water.

**Recommendation:** Provide a short-term upfront investment (~10 years) into DFO and First Nations program staffing to implement reconciliation and develop a pro-active governance approach to marine issues and fisheries management.

**INCORPORATE INIDEGNOUS KNOWLEDGE INTO MARINE MANAGEMENT:**

**Issue:** It is CCIRA and the Central Coast 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 AAROM 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.

**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, AAROM bodies and Nations should not be expected to bridge-fund programs because of holdbacks or delayed approval of contribution agreements.

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