



MARINER SEAFOODS

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To whom it may concern,

This submission is made from a commercial fishing company to show the problems we see in these regulations and the hardship the current pilotage regulations can bring our operations and our crew.

The main points I am addressing are the sea time requirements for a waiver, the waivers being vessel specific and not Officer specific, the waiting time for waiver approval and that domestic fishing vessels over 350 gross tons are even subject to pilotage regulation.

We are a commercial fishing vessel of above 350 gross tons, making us subject to the Pilotage Regulations. We fish 8-10 months of the year, our trips average 10-12 days and with our rotations and shore operation we employ up to 50 crew and 12 employees.

Our boat operates exclusively in Domestic waters, our boat and skippers are constantly in the coastal pilotage regulated waters. It is a 16 or 24+ hour transit one way through pilotage waters to our domestic fishing grounds.

Our skippers are trained and certified by Transport Canada, renewed with the necessary sea time, that they are certified safe and able to operate our vessel on our coast. The Pilotage Regulation is an unnecessary addition that brings harm to our operations and crew without proof of added safety.

The sea time requirements for a waiver are 150 sea days in 18 months or 365 sea days in the last 60 months. This requirement is greater than Transport Canada requires to maintain a Fishing Master certificate. We request that an option be given that reflects Transport Canada's regulations on maintaining a certification. In the case of a Fishing Master it would be 240 sea days in 60 months.

To have the waiver dependant on vessels and not on the Captains or Mates tickets creates hardship for both ticketed officer and the operation. If there is an emergency and a new or temporary Mate is needed on board, even though they are certified by Transport Canada and possibly even have a waiver on multiple other fishing vessels; they are not able to take our vessel out without a waiver

specific to our vessel which can take up to a week to grant. That is almost an entire trip for us, keeping 50 crew tied up and out of the profits of a trip for an unnecessary formality.

If there is an employment opportunity for a Captain or Mate to get on a new vessel, the operations might not hire them if they would have to wait for a vessel specific waiver. If the vessel must wait to go fishing they will go with someone they already have a waiver for, even if the fit wasn't right, to avoid tying up the vessel and lost fishing time for the crew.

These are just a few examples of how these regulations effect our industry.

Commercial fishing is a domestic operation whose very nature necessitates our Captains and Mates have a remarkable knowledge base of the coastal waters to be able to catch our fish. As you may be aware, Transport Canada has recognized the unique nature of commercial fishing and has made Fishing specific regulations in regard to certification, manning, etc..

Please review the Pilotage Regulations with regards to larger fishing vessels to:

- align the waiver sea time requirements to those Transport Canada requires to maintain certification and/or
- make the waiver Officer specific, not vessel specific and/or
- exempt fishing vessels from requiring a Pilot on board

Thank you,



Renée Mann