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April 5, 2107

Patricia Williams
Senior Resource Manager
Resource Management and Aboriginal Fisheries
Newfoundland and Labrador Region
Fisheries and Oceans Canada
NAFC - 80 East White Hills, Room M17-202
St. John's, NL
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Dear Ms. Williams:

RE: NORTHERN COD

The future of Northern Cod is very important to Labrador Fishermen's Union Shrimp Company Limited (LFUSCL) and the fishers of Southern Labrador. The company and the fishers are directly adjacent to this resource and must receive a reasonable share of this resource as quota increases. The cod stocks appear to be rebuilding but we have to exercise caution to ensure that the benefits of this resource are maximized over the long term. We must focus on the rebuilding of the industry as well as rebuilding the stocks.

The rebuilding of the industry has to focus on both processing and harvesting. This has to be a collaborative effort if the industry is to achieve maximum success. The industry needs to focus on the development of an overall structure that will see the fishery expand in a manner that maximizes the benefits that can be generated from this fishery. There has to be a process developed that will make meetings more constructive and help establish a blueprint for the future.

There has to be more planning on the future development of this fishery and the following should be considered:

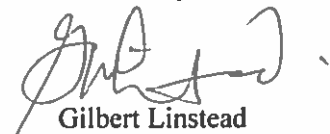
1. Industry consultations should focus on:
 - a) The development of access criteria.
 - b) Development of harvesting protocols to ensure that a top quality product is landed.
2. The commercial fishery should be separated from the recreational fishery. The commercial fishery will require more productive meetings so that constructive steps can be made towards the establishment of a long term plan that will maximize the benefits from the fishery.
3. The processing sector will ultimately require longer seasons to have a successful viable business. This is also essential if the plants are to provide meaningful levels of employment to the workers.

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4. The processing season can only be maximized if the harvesting of the fish is spread throughout the year with a focus on landing top quality fish. A discussion is required on what vessels and gear will be used to ensure that the value from this fishery is maximized.
5. Plants will require a longer season and thus consideration has to be given to when the fishery will be open to other groups including:
 - (i) Scandinavian longline fleet
 - (ii) 65 to 100ft sector
 - (iii) Special allocations and/or community groups
 - (iv) Greater than 100ft sector

This fishery is now in the development stage and attention should focus on the future. The fishery should remain a stewardship fishery with some reasonable increases in quota. The recent history of quota allocations has placed greater emphasis on adjacency and we must insist that this become the dominant principle in the allocation of the Northern cod stocks. 2J fishers would like to have a separate allocation or limit based on their direct adjacency to the resource. If the fishery is open to other sectors, the Labrador Fishermen's Union Shrimp Company Limited (LFUSCL) should receive a significant share of any quota based on the history of their Scandinavian longline licences and their direct adjacency to this resource.

Yours truly,



Gilbert Linstead
General Manager