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Part 24, Section 24.93

Sector: 7020 - Primary Resources, Fishing

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Type: Worker Association Representative

Organization: United Fishermen and Allied Workers' Union-CAW

Submission:

A) Requirement for Specific Fishing Operations: Herring - 24.106 (2b)

After consulting with some herring harvesters on the issue, I can offer the following comments:

It would appear to be appropriate to introduce 2b at this time as some herring operations seem to be converting to the "Alaska style" harvesting method, i.e., the use of a drum to bring in the net as opposed to the "beater bar/punt method. One operator I spoke to uses a combination of both methods depending on the circumstances.

I was told by everyone I spoke to that the herring drum operation differs dramatically from the salmon gillnet method in that, unlike salmon gillnetting, the herring net is brought in very slowly, almost painfully so, as one harvester told me. Hence, the likelihood of entanglement in the herring scenario is greatly reduced by the very manner in which the net is brought aboard. And if one were to become entangled in the net, there would be a lot of time to untangle oneself prior to the net reaching the drum.

Having said that, it was deemed advisable by the individuals I spoke to to have some kind of mechanism to stop the drum if it became necessary to do so. All favoured the "equally effective safeguard" as opposed to a "hold-to-run type device for reasons stated in the WCB explanatory notes, i.e., ergonomic issues as well as the desire to not be tied down to the drum control. Few were specific as to what the safeguard might be but were confident that industry could and would develop a solution.

Of more concern to some of the individuals I spoke with was the issue of staying clear of the beater bar area at all times. This appears to be covered under 24.106 (1).

B) Fishing Operation - General Requirements, 24.93:

I encountered little opposition to the need for sensors in crew quarters.

As an aside, the poor economics of some of our fisheries coupled with the rising costs of operating and maintaining vessels has caused some concern that it will be difficult for many operators to keep up with all regulatory initiatives (Transport Canada included).

One last comment: The move to an "Alaska style" herring drum method has been linked, in part, to an attempt to come to terms with declining incomes. With the herring drum operation, the number of crew can be reduced.

And it is this general trend to reduce crews and "manpower" in some fisheries that poses, in many circumstances, a major challenge to safety in our industry today.

Q: The proposed change is easy to understand

A: Agree

Q: The reasons given in the explanatory notes to support this change are relevant

A: Agree

Q: The proposed change will have a direct effect on the work carried out at my workplace

A: Neutral

Q: The proposed change will have a positive impact on the health or safety at my workplace

A: Neutral

Q: I support the proposal

A: Agree

Q: I will participate in the regulatory review on-line process in future

A: Agree
