Dec. 22nd, 1915

Mr. G.J. Desbarats,

Deputy Minister Naval Service,

Ottawa,

Ont.

Dear Sir,

We have to acknowledge receipt of your favor of the 23rd with relation to the proposal to establish a close season for halibut fishing.

We are quite in accord with the proposal to conserve this fishery in every way, and also agree that the present results compared with those of a few years ago, unquestionably show that the halibut fishery is being rapidly depleted.

As to the points you raise, first, of time of close season, our idea is that this should be so arranged as to cover the spawning period irrespective of whether that time comes in good fishing months or otherwise; and we are inclined to think that the spawning period would more likely be January, February and March, or February, March and April, instead of December, January and February as has been proposed.

As regards the objection that has been taken that a sufficient quantity would be secured during the open season to provide stock for the close period, we cannot see that any such

objection would be valid. During the months from May to October, fishing conditions and weather are such that large catches are made, prices decline, and the cold storage operators take advantage of these conditions in order to freeze for winter consumption. This trade is already an important one and commands most of the winter business, and we cannot see that it would interfere in any way with the industry. It is only during these months that the price is low enough to enable people to freeze halibut, as during the rest of the year prices paid fishermen are, on the average, higher than the gross selling price the frozen product brings. We also figure there should be no more question of discrimination against the frozen product than there is against selling trout raised in private ponds during the close season, or ~~open~~ ordinary trout fishing.

As regards the suggestion that the close season during the months of January and February would be interferring with those making a livelihood out of the halibut industry, we might say that during these months most of the operators - both large companies and individual fishermen - voluntarily cease operations as weather conditions and catch are so adverse that there is no money to be made, even though prices obtainable might be considerably higher than prevailed during other times in the year.

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We might say that there has been an investigation into the life history of the halibut during the past two years, under the auspices of the Provincial Government, and their expert is at present on the halibut fishing grounds continuing his studies of halibut life. We would suggest that any action which may be taken in the matter of close seasons, and what period they should cover, should be based entirely upon such data as can be obtained through such investigations as the local Government are now carrying on.

Yours truly,

Kincolith Packing Co.Ltd

"Henry Doyle"

Manager.

HD/N