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# I N D U S T R Y P R O F I L E

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Regional Industrial  
Expansion

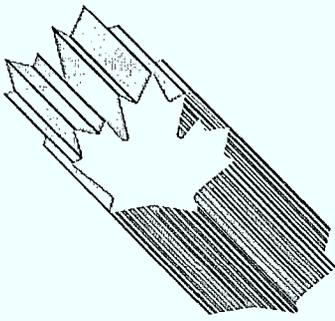
Expansion industrielle  
regionale

Ministry of State  
Science and Technology  
Canada

Ministère d'État  
Sciences et Technologie  
Canada

## Fishery Products — Atlantic Groundfish

Canada

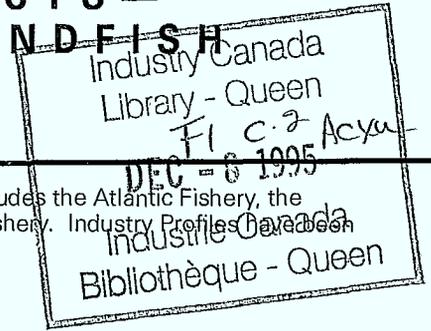


# I N D U S T R Y

# P R O F I L E

## FISHERY PRODUCTS — ATLANTIC GROUND FISH

1988



### FOREWORD



In a rapidly changing global trade environment, the international competitiveness of Canadian industry is the key to survival and growth. This Industry Profile is one of a series of papers which assess, in a summary form, the current competitiveness of Canada's industrial sectors, taking into account technological and other key factors, and changes anticipated under the Canada-U.S. Free Trade Agreement. Industry participants were consulted in the preparation of the papers.

The series is being published as steps are being taken to create the new Department of Industry, Science and Technology from the consolidation of the Department of Regional Industrial Expansion and the Ministry of State for Science and Technology. It is my intention that the series will be updated on a regular basis and continue to be a product of the new department. I sincerely hope that these profiles will be informative to those interested in Canadian industrial development and serve as a basis for discussion of industrial trends, prospects and strategic directions.

Minister

The Canadian Fishery Products Industry includes the Atlantic Fishery, the Pacific Coast Fishery and the Freshwater Fishery. Industry Profiles Canada prepared on:

- Atlantic Groundfish
- Atlantic Pelagics
- Atlantic Shellfish
- Pacific Coast Fishery

The present profile should be read in conjunction with the companion profiles.

## 1. Structure and Performance

### Structure

The Atlantic groundfish sub-sector of the Canadian fishery products industry comprises the processing of bottom feeding seafish such as cod, haddock, flatfish and other species. It is the largest segment of the industry, accounting for \$1.16 billion, or 39 percent, of the total value of shipments of the Canadian fishery products sector, and 56 percent of Atlantic shipments in 1986. A separate employment breakdown for Atlantic groundfish is not available\*; however, the sub-sector likely accounts for a proportional 39 percent share of the total employment which is in the order of 27 000. Newfoundland and Nova Scotia are the two main harvesting provinces, accounting for about 38 percent and 49 percent respectively of the total value of groundfish landings in 1986.

Two large firms account for the majority of sales: Fishery Products International (FPI) and National Sea Products (NSP). These companies are among the largest fish-processing companies in the world, and both are multi-national enterprises which have set up subsidiary processing and sales operations in the United States. In addition to these two large firms, the industry includes many privately owned smaller firms. FPI and NSP (and some others) are vertically integrated, trawler-owning companies, operating primarily in the offshore sector with vessels over 100 feet in length. With this harvesting technology, they can maintain year-round plant operations, although both major companies also receive some of their fish supply from inshore fishermen. In 1987, about half of the Atlantic groundfish allocations were made to the offshore fleet.

Production at inshore plants is limited by the shorter inshore fishing season, although some operate for as long as ten months each year. Most of the smaller-scale inshore processors depend on privately owned fishing vessels for their fish supply. Generally, the inshore plants do not have their own fleets.

\* In general, employment estimates for the industry are difficult to make, because of the extreme seasonality of the industry.

Canada

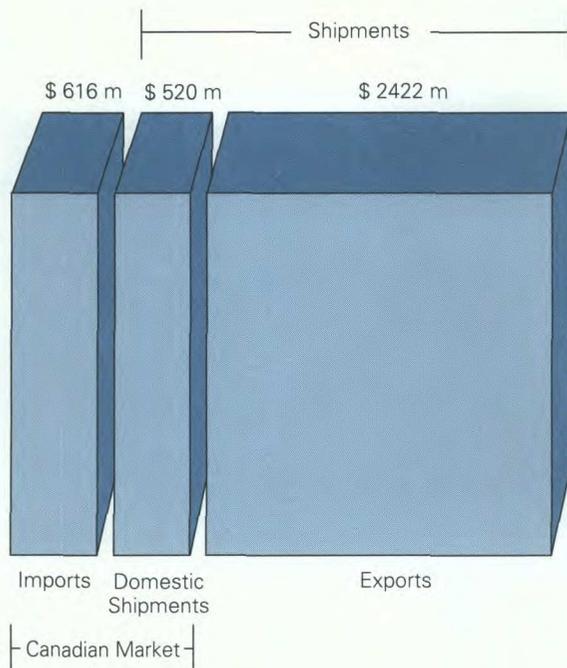
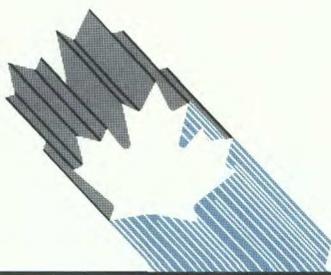


Regional Industrial Expansion

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Canada



**Fishery Products Industry\***  
**Imports, Exports and Domestic Shipments**  
**1986**

\* Includes total industry. Separate data for imports, exports and domestic shipments of Atlantic Groundfish are not available.

The Canadian Saltfish Corporation (CSC), a federal Crown corporation, has a monopoly on the sale of saltfish production from Newfoundland and the Quebec north shore. Saltfish producers in this area, many of which are small and unsophisticated, must market their output through the CSC.

Plant size varies from large to small seasonal plants. Economies of scale can be achieved in larger plants with longer production runs, but on-site management and product flexibility can allow for the profitable operation of smaller plants.

Groundfish is processed into a variety of products. It is most commonly frozen into blocks and fillets. A significant portion of the catch is salted, and some is also sold fresh, mostly in filleted form. The proportion of fish sold fresh has been increasing recently, in response to strong demand in the U.S. market.

The Atlantic groundfish industry is heavily trade oriented, with exports accounting for over three-quarters of production. The U.S. market accounts for more than 80 percent of these exports. In the case of both frozen fillets and blocks, the U.S. market accounts for the bulk of total groundfish exports, with Canada being the largest supplier of groundfish to this market.

By volume and value, frozen cod fillets and blocks are Canada's largest groundfish export items. Canadian frozen groundfish fillets compete in the U.S. import market with Scandinavian products, in particular those from Iceland and Denmark. Other significant suppliers (based on 1986 imports by value) are New Zealand, Japan, and Korea.

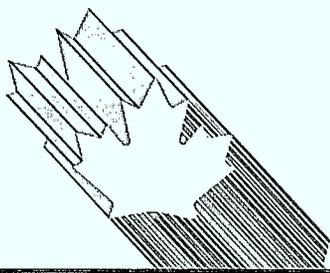
The United States imports virtually all its blocks, which are then used for further processing. The block market is supplied at the low-priced end with lower-quality species from Korea (accounting for more than 10 percent of U.S. groundfish block imports in 1986) and South America (accounting for more than 25 percent of U.S. imports of non-traditional species, mostly hake). At the mid and top segments of the market, Canadian product competes with Scandinavian product (largely cod), with price directly related to the quality and product specifications of the customer.

Canada has raised its share of the U.S. cod block import market from 28 percent in 1977 to 52 percent in 1986, by both volume and value. Measures have been taken to upgrade the quality of Canadian production of both fillets and blocks, allowing Canada to meet a broad range of market requirements and to increase export revenues.

Some competition for Canadian products in the U.S. market is provided by U.S. domestic production. The bulk of U.S. domestic groundfish catch on the Atlantic coast is sold on the fresh market. The U.S. Atlantic catch has been declining, and in 1986 it was 17 percent lower, by weight, than the 1984 catch. The Alaska fishery produces mainly frozen products, including surimi, which is used to create shellfish imitations. U.S. policy is actively promoting the "Americanization" of the Alaska fishery and foreign fishing in U.S. waters has been phased out. The U.S. catch of Pacific cod and Alaska pollock, in many cases using factory freezer trawler harvesting technology, has been increasing significantly. This U.S. supply is providing increasing competition in the U.S. groundfish fillet market.

Due to relatively higher tariffs in both the United States and Canada on breaded/battered portions and fish sticks, the largest Canadian processors have established subsidiaries in the United States for further processing, and some U.S. companies have established similar operations in Canada.

After the United States, the only other major export market for Canadian groundfish is the European Community (E.C.), which imports products in both frozen and salted form. Exports have been restricted by trade impediments, discriminatory trading arrangements and, until recently, currency relationships. Canada has been regarded by the E.C. as a residual supplier of frozen groundfish. Saltfish is also exported to the Caribbean and Latin America. There are limited exports of groundfish to Japan, mostly frozen fillets, with redfish being the most important product.



Canada imported \$49.4 million of fresh and frozen cod, haddock, hake and halibut in 1986, primarily from the United States and the United Kingdom. These products accounted for more than 18 percent of total fishery imports from the United States, by value.

### **Performance**

The sector's performance was profoundly affected by the declaration of the 200-mile fishing zone in 1977. Resources available for Canadian harvesting and production volumes have increased markedly since then. However, anticipation of an increased fish supply because of extended fisheries jurisdiction resulted in a substantial expansion of the industry's capacity, beyond economic necessity. Much of the expansion was debt-financed, and high interest rates and low demand during the recession in the early 1980s had a dramatic negative effect on profits.

International supply pressures on the main consuming markets kept prices low while production costs increased. The resulting cost-price squeeze drove many processors to the verge of bankruptcy. Severe losses occurred, beginning in 1980. A 1983 survey of firms accounting for more than 80 percent of Atlantic groundfish production showed that gross margins in the industry declined from around 20 percent in 1978 to about 10 percent in 1982, and, as a percentage of sales, a four percent net income dropped to an eight percent loss.

A number of firms, including FPI and NSP, received financial assistance during this period from the federal and provincial governments to provide the restructuring designed to return them to profitability. The greatest part of the assistance went to FPI, in the form of equity. FPI was formed through the amalgamation of several Newfoundland firms.

Beginning in late 1985, a tighter world resource situation and increasing growth in U.S. consumption, reflecting a structural change in demand toward lighter and healthier foods, produced significant price increases. Most firms in the sector are now profitable, and many are undertaking modernization and productivity improvements to increase their competitiveness. NSP has been earning increasing profits since 1985. FPI returned to profitability in 1986, and was privatized at the beginning of 1987. While further rationalization may be required, especially in remote areas with relatively less infrastructure, the industry, for the most part, is now internationally competitive.

The Canadian industry is further benefiting from the successful development of sales of higher value products, lessening dependence on the lower-value, commodity-type block market. Some of the higher-valued products are premium frozen fillets and entrées. The rapid development of higher-margin fresh fish sales have also made a major contribution to the improved profitability of the industry. In the face of expected slower resource growth, the industry is taking measures to adjust product mix to ensure maximum returns.

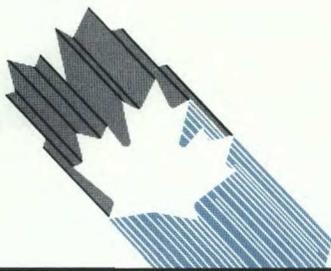
Capital and repair expenditures in the fish processing industry declined in 1981, as they did for the food and beverages sector as a whole, in response to the recession. Although investment in the fish processing sector increased in 1982, it declined again in 1983. It has been climbing steadily since then. 1986 was the first year investment returned to 1980 levels; intentions for 1987 showed dramatic increases, in response to good conditions in the industry.

## **2. Strengths and Weaknesses**

### **Structural Factors**

Canada's major competitive strength in the groundfish sub-sector is access to a well-managed and generally stable resource. As well, the industry benefits from proximity to a major consuming market, the United States. The sector contains some very efficient processing plants, both large and small. The only significant weakness is the existence of several plants in remote locations, some of less than optimal scale, which generally experience difficulties during market downturns.

Resource management was profoundly affected by the implementation of the 200-mile economic zones in the mid-1970s, which resulted in major structural changes to the world fishery. In many cases, major producer countries were transformed overnight into importers. The Canadian industry went through a period of turmoil and adjustment at the time, but achieved the advantage of a large, well-managed groundfish resource base. Only limited additional volume growth is currently projected after a number of years of substantial increases in Canadian landings. However, the situation compares favourably with resource constraints faced by many other producing countries and the overall world outlook. Future increases in world supply may be possible only from non-traditional species such as South American hake or Alaska pollock.



Introduction of a new system of allocating fish quotas to companies (Enterprise Allocations) in 1982 has also enabled a better utilization of capital invested in both fleets and processing. Each eligible groundfish processor is now annually assigned an individual share of the overall offshore groundfish quota. This can be harvested over the season/year in accordance with plant needs. Formerly, competition for the resource forced a race for fish, resulting in uneven and inefficient harvesting and processing. The new system should give Canada a long-term advantage in world markets.

The Canadian government's decision in 1986 to authorize up to three factory freezer trawler licences represented an important step to world-class technology and should help the industry to better meet evolving export market demand for frozen-at-sea products. One such vessel is now in operation.

Efficiency of operations varies significantly from plant to plant. Several plants in the sector are large, with year-round fish supply, making them efficient and low-cost operations. Some of the smaller plants have state-of-the-art processing technology, and benefit from hands-on, owner-operator management. However, a number of plants are not well-positioned competitively. They were built during the expansionary period of the late 1970s, many without consideration of long-term raw material supply, availability of skilled labour and management, and marketability of the production. In many cases, where they represent the single industry in the community, there has been strong pressure to maintain such plants. These plants are operating successfully in the current strong market conditions, but may encounter difficulties in any future downturn.

#### Trade-related Factors

Tariffs on relatively unprocessed fishery products are low in the United States, Canada's most important groundfish market. High tariffs on further-processed products have discouraged Canadian production for export. Canadian exports to the United States have been troubled by anti-dumping and countervailing duty actions, and are restricted by "Buy America" provisions. Canadian exports of fish to the E.C. and Japan, the next most important markets, must overcome a variety of tariff and quota barriers. Canada is at a disadvantage in the E.C., because of preferential tariffs given to other supplier nations.

Shipments (\$m)

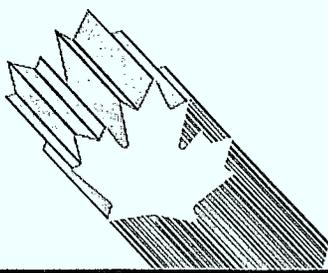


Total Shipments

In the key U.S. market, the \$0.01875/lb. tariff applied to fresh or frozen groundfish fillets does not significantly inhibit trade, although it represents a potential loss of income to Canadian processors. Higher tariffs apply to further-processed items such as fish sticks/battered and breaded products, dutiable at 10 percent to 15 percent, and prepared entrée type items, dutiable at six percent to 10 percent depending on the presentation. Imports of fish sticks, portions and like products to Canada are similarly dutiable at five percent or 11 percent (depending on the item) and entrée items at five percent to 17.5 percent. Other groundfish items enter free of duty.

In addition to tariff barriers, "Buy America" provisions on federal and state purchases (e.g., for school-lunch programs and for government or armed forces commissaries) require supply of U.S. processed product and hence act as a non-tariff barrier. Both of the larger firms have American subsidiaries and can meet this requirement.

U.S.-Canadian trade in groundfish has become increasingly affected by complaints of unfair trade made by the U.S. fishing interests. There has been a series of investigations, requiring considerable effort and money on the part of the Canadian industry to mount a defence. In two recent cases, protective measures have been instituted by the United States: Canada's saltfish exports to the States became subject to U.S. anti-dumping duties in 1985 and, in a May 1986 decision, a U.S. countervailing duty of 5.82 percent ad valorem, attributed to a wide range of federal and provincial programs, was imposed on whole fresh groundfish imported from Atlantic Canada. Filleted fresh groundfish, in the same investigation, was found not to be causing injury to the U.S. industry. Because of strong market conditions, the impact of the duties imposed has been mitigated.



In the E.C., trade restrictions are both numerous and complex. Major Canadian groundfish exports, which consist primarily of frozen and salt cod, are subject to varying tariff/quota restrictions. The Scandinavian countries have preferential access for some of these products, which puts Canada at a competitive disadvantage. An Exchange of Letters between Canada and the E.C., which provided Canada with more favourable market access on a number of groundfish items in return for E.C. access to Canadian fish stocks, had only limited benefits (the agreement expired at the end of 1987). The E.C.'s reference price system can be used to set minimum prices for imports, limiting access to the market. In the past, however, use of this system has not seriously impaired Canadian trade.

Groundfish exports to Japan are subject to quota restrictions and significant tariff protection. Canadian cod is subject to an import quota on a basket of seven items which is assigned a dollar value, not a tonnage limit. Since Canadian cod is relatively expensive, importers prefer to import other species under the import quota. As well, the method of administering the import quota makes it difficult for a relatively unknown product such as Canadian cod to gain a foothold in the Japanese market.

The most important element of the Canada-U.S. Free Trade Agreement (FTA) to the Atlantic groundfish sector will be the removal of tariffs. The tariffs on primary processed products (frozen whole fish and fillets) will be eliminated either immediately or over five years, while those on further-processed products, such as prepared fish dinners, will be removed after 10 years. Another element of interest to the sector is the provision of a trade-dispute settlement mechanism for anti-dumping and countervailing duties.

### Technological Factors

Given post-1980 financial results, processors have, until very recently, been unable to invest in productivity-related improvements, even though the industry has demonstrated that significant productivity gains can be made when capital is substituted for labour. Smaller plants in remote areas, where employment maintenance is important, may be limited in their ability to mechanize operations.

The Canadian industry, for the most part, is not as technologically advanced as its northern European counterparts. This is partly due to differences in levels of the available labour pool. In northern European countries, automation has been necessary to reduce dependence on labour, which is in short supply. The opposite is true in Atlantic Canada where there is a large unemployed labour force. As well, given the short seasons in most areas of Atlantic Canada, it is advantageous to keep fixed investments (machinery and equipment) and overhead costs low, and rely more on labour inputs.

Automation, superior handling methods and a narrow range of products have allowed northern European processors to compete most successfully in premium-quality markets. However, the quality of Canadian products has improved significantly in recent years. Additionally, Canadian plants generally produce a wide range of products, and this is becoming more important as the market demands a wider variety of specialty items.

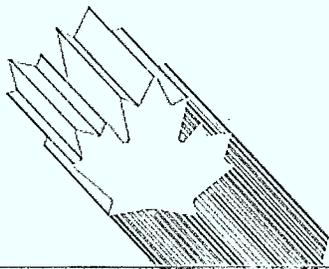
Much of the Atlantic offshore trawler fleet is in need of upgrading or replacement, which will mean substantial capital expenditures. A number of vessel contracts have been, or are being, placed. A modern fleet will be essential to the long-term competitiveness of the sector.

Boxing at sea, which improves the quality of the fish, is already widely used in northern Europe and has been adopted by a number of Canadian fishing companies. In 1986, NSP lengthened and containerized nine of its trawlers and has plans to convert more vessels in future. FPI containerized seven vessels in 1986, and modernization work is continuing. As well, NSP operates a factory freezer trawler and FPI purchased a freezer trawler in 1986. These harvesting technologies allow the companies to produce high-quality product forms.

### Other Factors

Because the industry is based on the catching and processing of a common-property biological resource, it is also subject to a broad range of regulatory controls administered by the Department of Fisheries and Oceans (DFO). Utilization of the biological resource is regulated through the determination of total allowable catches, as well as the setting of offshore enterprise allocations and inshore and middle distance quotas by gear sector. Resource utilization is also governed, in the case of transboundary or straddling of the 200-mile economic zone stocks, by various international conventions to which Canada is a signatory. The annual groundfish management plan determined by DFO attempts to balance regional resource availabilities, and inshore and offshore requirements and capacities.

Foreign investment in the industry is influenced by DFO policy which prohibits the granting of fishing licences to any firm with more than 49 percent foreign ownership. This limits foreign investment in those processing firms which are vertically integrated and hold fishing licences.



### **3. Evolving Environment**

Health considerations and income growth are expected to continue to boost U.S. demand for groundfish. Because there is not enough supply to meet the increased demand, prices of traditional species have risen significantly over the last two years. Some consumer price resistance has been encountered because the price of groundfish has become unfavourable compared to other sources of protein. Prices for some products have declined from levels reached in 1987.

Given the positive demand outlook and Canada's stable supply, there will be opportunities for increased groundfish exports to the United States. The supply shortage will increasingly be filled with non-traditional species, such as South American hake. Diversion of more Alaska pollock from surimi to fillet production is also a strong possibility.

Considerable potential exists for surimi, not only for analog products (i.e., crab legs) but also for protein enhancement or substitution in other products. However, existing technology uses groundfish as the principal raw material and current high groundfish prices may limit surimi's growth unless the technology can be adapted to other species.

The United Kingdom, where there is a strong consumer attachment to cod, is an important market for groundfish, and this situation is expected to persist. Cod is also the major groundfish species consumed in France, another important E.C. market. Consumption of salted and dried groundfish is highest in Portugal, Spain and Italy.

Positive consumption trends in the E.C. will represent opportunities for Canadian fish processors only if improved market access can be achieved. Negotiations related to the accession of Spain and Portugal to the E.C. may result in slightly impaired access for fishery products, and it will be some time before improvements might be negotiated in the current multilateral trade negotiations under the General Agreement on Tariffs and Trade (GATT).

There is little potential for increased exports of Atlantic groundfish to Japan. One company (FPI) has recently introduced a line of groundfish products into the Japanese retail market — a first for the Canadian fishery products industry.

Although positive structural changes have taken place in the groundfish market, the industry has traditionally been highly cyclical. It will be important for processors to take advantage of the existing favourable conditions to ensure long-term international competitiveness.

Prices of finished products are currently high. Prices paid to fishermen have been increasing rapidly, narrowing processors' margins. Under these conditions, improved efficiency will be important to maintaining profitability. Changes may involve the closing of inefficient plants and the increasing mechanization of others.

Further value-added products will be a way for Canadian exporters to obtain greater returns from the resource. There has been a significant increase in exports of further-processed products into the United States recently. Removal of the tariffs on further-processed products under the FTA is expected to provide new opportunities for participation in this business by the smaller Canadian companies which do not have U.S. operations. Canadian production is likely to increase, and this will probably more than offset any loss of U.S. fish-processing subsidiaries in Canada. There are quality advantages to processing the fish where it is harvested, which should enable Canadian operations to be competitive under the FTA.

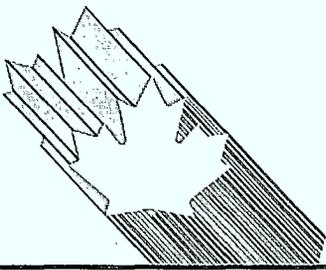
The trade-dispute settlement mechanisms proposed under the FTA are expected to impose increased discipline on the use of anti-dumping and countervailing duties, and this would lead to greater security of access to the U.S. market.

### **4. Competitiveness Assessment**

The Canadian industry has been, and is likely to remain, competitive in the most important export market, the United States, in the major frozen-block and fillet product areas. Canadian producers will continue to face pressure from developing countries at the low, and probably slower-growth, end of the U.S. market, and in the mid- and high-priced segments from Scandinavian suppliers.

Canadian suppliers are competitive in the growing fresh fish trade, supplementing limited U.S. supplies, and are also expanding exports of premium frozen products. The Canadian industry will need to continue adjusting production to meet changing conditions and will need to implement measures to upgrade productivity while avoiding unnecessary capacity increases. A fairly stable Canadian resource base will likely offer an increasingly important competitive strength, although any future growth in stocks will be much slower than in the past.

The Canadian domestic market ranks after the U.S. market in terms of shipments. The industry already operates competitively in this market, largely without tariff protection.



In the E.C. market, which represents an important opportunity for diversification, Canada has tended to serve as a residual supplier. This has been, in part, due to preferential access for Scandinavian suppliers and significant tariff and non-tariff barriers to trade. Progress in reducing trade barriers will have to be achieved before significant market penetration is possible. However, improving currency relationships are increasing the competitiveness of Canadian products in this market.

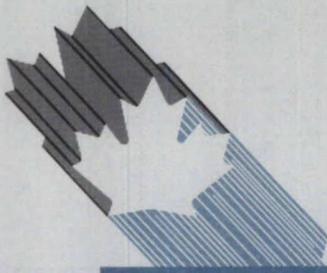
The Canadian industry currently competes in only a few specific product/ market niches in the Japanese market, although this is changing. Prospects are somewhat limited because of Japanese import quotas and tariffs, and the relatively high prices of the species produced in the Atlantic.

Removal of tariffs under the FTA will increase the competitiveness of operations based in Canada for further-processed products. This will likely lead to an increase in production and employment at Canadian plants. Improved security of access to the U.S. market would also enhance competitiveness.

For further information concerning the subject matter contained in this profile, contact:

Service Industries and Consumer Goods  
Branch  
Department of Regional Industrial Expansion  
Attention: Atlantic Groundfish  
235 Queen Street  
Ottawa, Ontario  
K1A 0H5

(613) 954-2927



**PRINCIPAL STATISTICS**

**SIC COVERED: 102\***

*Because breakdowns for the Atlantic groundfish sub-sector are not available, the majority of these statistics apply to the Canadian fishery products sector as a whole.*

	1973	1982	1983	1984	1985	1986
Establishments	330	348(e)	392	397	390	N/A
Employment	21 424	25 382	24 577	24 372	26 964	N/A
Shipments (\$ millions)	748	1 904	1 887	1 852	2 493	2 942
Shipments ('000 tonnes)	538	681	647	666	783	832
Landed values (\$ millions)	321	888	880	904	1 131	1 330
Landings ('000 tonnes)	1 118	1 413	1 349	1 278	1 446	1 510
Profits after tax (\$ millions)	34.3	(73.7)	(41.9)	9.7	N/A	N/A
(% of income)	4.2	—	—	.5	N/A	N/A

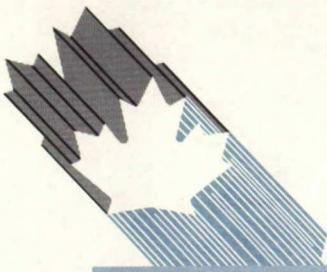
Atlantic Groundfish	Preliminary					
	1973	1982	1983	1984	1985	1986
Landings ('000 tonnes)	540	820	766	740	765	773
Landed values (\$ millions)	81	291	277	265	295	360
Shipments (\$ millions)	244	784	725	735	872	1 120

**TRADE STATISTICS**

	1973	1982	1983	1984	1985	1986
Exports (\$ millions)	499	1 612	1 569	1 597	1 859	2 422
Domestic shipments (\$ millions)	249	292	318	255	634	520
Imports (\$ millions)	111	365	441	514	496	616
Canadian market (\$ millions)	360	657	759	769	1 130	1 136
Exports as % of shipments	67	85	83	86	75	82
Imports as % of domestic market	31	55	58	67	44	54

Source of imports (% of total value)		Central and South				
		U.S.	E.C.	America	Japan	Others
	1982	59	3	11	6	21
	1983	57	5	9	7	25
	1984	56	4	8	7	25
	1985	54	8	10	7	21
	1986	51	8	7	7	27

Destination of exports (% of total value)		Other				
		U.S.	Japan	E.C.	Europe	Others
	1982	55	15	16	7	7
	1983	62	12	16	4	6
	1984	61	15	13	3	8
	1985	61	17	14	2	6
	1986	59	18	14	3	6



**REGIONAL DISTRIBUTION — Average over the last 3 years**

	Atlantic	Quebec	Ontario	Prairies	B.C.
Establishments — % of total	73	10	4	1	12
Employment — % of total	77	8	N/A	N/A	13
	Atlantic Coast (including Quebec)	Inland Fisheries	Pacific Coast		
Shipments — % of total	69	5	26		

**MAJOR FIRMS — Atlantic Groundfish**

Name	Ownership	Location of Major Plants
National Sea Products	Canadian	Nova Scotia, New Brunswick
Fishery Products International	Canadian	Newfoundland, Nova Scotia

\* SIC on 1980 basis  
\*\* Estimated

# Regional Offices

## Newfoundland

Parsons Building  
90 O'Leary Avenue  
P.O. Box 8950  
ST. JOHN'S, Newfoundland  
A1B 3R9  
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## Prince Edward Island

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CHARLOTTETOWN  
Prince Edward Island  
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## Nova Scotia

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Tel: (902) 426-2018

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## Alberta

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