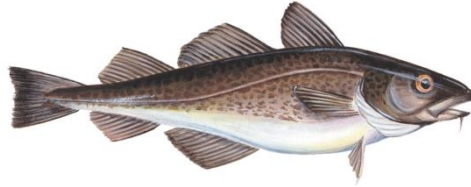


Newfoundland and Labrador Region Public Consultations on the Proposed Implementation of a Licence and Tags Regime for the Recreational Groundfish Fishery



What We Heard

A Summary of Comments from Public Consultations – November 2016

Executive Summary

On May 20, 2016, the Government of Canada announced an extension to Newfoundland and Labrador's recreational groundfish (cod) fishery. That announcement indicated that in 2016, the public would be able to fish for a total of 46 days during the annual recreational groundfish fishery. This is an increase of 14 days over previous years. The expanded season dates also applied to tour boat operators. In addition, the announcement indicated that full consultations on the proposed new licence and tags regime would be undertaken with the public and industry in the near future.

This *What We Heard* document has been prepared following a series of regional Aboriginal consultations, eight public meetings (St. John's, Clarenville, Gander, Corner Brook, Mary's Harbour, Plum Point, Carbonear and Marystown), as well as an online consultation process which was active from November 01 to 30, 2016. The consultations sought public input on the *Proposed Implementation of a Licence and Tags Regime for the Recreational Groundfish Fishery*. This document summarizes the themes emerging from the consultations and all correspondence and emails received by the Department during this process.

Consultations participation

Public meeting details

Community	Location	Date	Participation
St. John's	Capital Hotel	Thursday, November 03	140
Clarenville	Clarenville Inn	Monday, November 07	33
Gander	Albatross Hotel	Tuesday, November 08	23
Corner Brook	Civic Centre	Wednesday, November 09	23
Mary's Harbour	River Lodge Hotel	Monday, November 14	8
Plum Point	Plum Point Motel	Tuesday, November 15	10
Carbonear	Fong's Motel	Thursday, November 17	31
Marystown	Marystown Hotel	Monday, November 21	15
		TOTAL	283

A form letter expressing opposition to the use of plastic tags was received, via email, from 64 people.

As well, 118 email submissions were received from individual members of the public.

The consultation website, is found online at: <http://www.inter.dfo-mpo.gc.ca/NL/CC/Recreational-Groundfish-Consultations-2016>

Common themes emerged during the month-long process. These themes, listed in order of most commonly noted topics, were:

- This is a food fishery, not a recreational fishery
- Strong opposition to the use of tags, particularly plastic tags
- Value of tags as a management measure was challenged
- Support for a recreational licence, with mandatory harvest reporting
- Why is this being planned only for Newfoundland and Labrador first?
- Management measures for the future fishery recommended
- Cultural and heritage significance of this fishery
- Concern with the cost of licences and tags
- Support for the possible implementation of a minimum fish size
- This is a “money grab” for Fisheries and Oceans and the Government of Canada
- Skepticism regarding enforcement operations
- Calls to close the Capelin fishery
- Critiques of the consultation process
- Appreciation for the consultation process

Common Themes Emerging from Consultations

Name this fishery the Food fishery, not a recreational fishery

A common theme heard repeatedly during the consultation process was that the fishery should be called “what it is: a food fishery”, not a “recreational or sports fishery”. Referring to this as a recreational activity diminishes the traditional practice of fishing for Cod as food. It was proposed that Fisheries and Oceans (DFO) should rebrand this fishery. Others expressed strong views that the Department does not understand the culture and tradition of this heritage fishery. During public meetings and in written correspondence, there were repeated references to “the right to harvest fish for food”. As one speaker stated, “This fishery is about food sustainability.”

Strong opposition to the use of tags, particularly plastic tags

Most participants expressed opposition to the use of tags as a management measure. Participants questioned the utility of tags, and expressed passionate opposition to the use of plastic tags both as an ocean pollutant risk, and as a waste of money. Participants indicated that the use of tags will not assist conservation efforts and that those who abuse the regulations will continue to do so whether tags are implemented or not. Numerous submissions expressed concern regarding tags creating unnecessary ocean pollution, including the at least 64 people who participated in a nationwide Ministerial letter writing campaign to that effect. To quote the letter: “We ask that if this tagging system is necessary, that DFO use metal tags similar to the ones they use in their own research rather than plastic, a known marine pollutant.”

The proposed implementation of a licence and tags regime is viewed as imposing restrictions on those who go fishing at the last minute. Tags make that process more complicated.

Value of tags as a management measure was challenged

The value of tags as a tool by which to gather landings data was widely questioned. People expressed the view that “There must be other options?”, and “How do tags help Science?” Numerous correspondents suggested that fishers can report their harvest, at season or year end, without using tags. People indicated that they do not agree with the rationale that science analysis of stock status requires more detailed information on overall harvest levels from the recreational fishery.

People felt that Science Branch can obtain the data on recreational groundfish catch estimates using other methodologies including: surveys, sampling, and Fishery Officer’s observations.

Some expressed the view that tags are “convoluted”/ a “nuisance”. Some feel that the recreational fishery is not really having a significant, adverse impact on stocks and should not be

portrayed as impacting the commercial fishery. The following perspectives were articulated: “Tags, if required, should be tamperproof”, and “Do not repeat the mistakes made in the previous pilot”, which lead to much abuse of the tags system. How does DFO propose that fishers properly dispose of the tag after use? “Tags won’t fix poachers, yet all of us are being penalized due to the actions of poachers.”

Support for a recreational licence, with mandatory harvest reporting

Some participants indicated support for the implementation of a recreational groundfish licence, with the inclusion of a mandatory reporting requirement, as long as the cost is minimal. As with many of the management measures discussed during the consultative period, there were varying views on this theme. The consultations heard comments to the effect that people are willing to “put up with it” for a longer season, and possibly a higher bag limit. During public meetings, suggestions to indicate that only a licence and reporting log are required were repeatedly endorsed (i.e. without a tags system), and in some cases, met with applause during public meetings. There is a view that while people could support the use of a licence and reporting regime, but not the use of tags.

Some sentiments were expressed that DFO will need to introduce an incentive to proactively encourage accurate and timely reporting. (E.g. a licence condition directly linking the mandatory submission of accurate reporting to a licence holder’s eligibility to receive another licence in subsequent years.)

There was noted skepticism regarding the anticipated accuracy of mandatory reporting of harvest, including comments such as “What historic information does DFO have regarding the total harvest over time?” Conversely, others acknowledged and understood the need for more clear information on total recreational fishery removals. There was also repeated messaging that participation rates in provision of information returns would likely be very low. The Department was questioned as to how it will deal with that issue.

Why is this being planned only for Newfoundland and Labrador first?

Both the meetings and online submissions pointed to a level of frustration driven by the opinion that the rules (i.e. seasons and daily bag limits) are different for Atlantic Canada and Quebec, as well as in British Columbia and even in nearby St. Pierre et Miquelon, France. There are strongly held views that fishers in this province are being “singled out” and treated in a “discriminatory” manner with the plan to implement this only in Newfoundland and Labrador first, and to introduce this new regime elsewhere in the future. This is widely viewed as “inequitable” and “unfair”. There is a growing sense of ever increasing regulations being applied to citizens in the province, but not consistently elsewhere. The consultation process heard messages about the perceived disparity that Newfoundland and Labrador fishers are being “punished” are viewed as

“untrustworthy” and are being treated like “crooks”, while the same limitations are not being imposed on fishers in other Atlantic provinces.

Some feel that this is simply a repeat of the 2001-2002 pilot projects, which did not get implemented on an Atlantic-wide basis. Participants challenged DFO’s statement that the pilot program was “generally well received” – in fact, the pilot projects were referred to as a “slap in the face” and “a farce.” People expressed the sentiment that “DFO does not trust fishers.”

Management Measures for the future fishery

Bag limits

During the consultations process multiple participants requested that the Department eliminate either the current daily bag limit or boat limit, and /or eliminate both. It was proposed numerous times that these should be replaced by a longer harvesting season, of varying duration. It is felt that if tags are implemented, a daily bag limit will not be required. Additionally, there is a perspective that whatever the tag limit is determined, that should be the bag limit. Fishers should be allowed to take all their fish in one day if they can, which would further assist with cost reduction for individual fishers. Also, the longstanding 15 fish per trip boat limit is seen as arbitrary, “foolishness”, “cumbersome” and is not in keeping with “the spirit of this fishery”. At least one speaker was in opposition to removing the daily bag limit, but will “put up with it” for the value of the management information to be obtained.

The recreational groundfish fishery is seen as creating significant rural economic impact and positive activity, which should not be overlooked. “Outport communities become alive once again.”

Season duration

There was widespread agreement that the season should be significantly longer, as tags will still provide a harvest limiting tool. The Department was requested to make the season longer “so that the fishery is safer and people won’t choose go out on bad weather days”. Suggestions regarding season dates varied widely, including proposals to stagger opening dates by bays. Some noted that the season should be 01 June to 30 September, in order to accommodate those who work away from home/shift work schedules. Others indicated that the season should be open all year (January 1 to December 31).

Many indicated that they were pleased with the 2016 management approach and there were repeated calls for keeping the status quo with the 46 days announced for the 2016 fishery. Participants recommended that the Department keep that approach “Make the fishery as simple for fishers as it was in 2016”. Some expressed the view that a longer season will alleviate safety concerns.

It was requested by some commercial fishers, that DFO consider not opening the recreational and stewardship/commercial fisheries at the same time, so as to avoid potential fisher conflict.

Licence categories and age requirements

Clarity was sought regarding age requirements for licences. Does someone younger than 16 years need a licence? Are family licences or one day licence categories possible options, as that would make this more cost effective for family groups? It was suggested that when a fisher takes a young person out to participate in this fishery, that young person's fish does not need to be tagged, or at least not be taken off the daily bag limit of other fishers in the boat. Further, the availability of the licence and tags was questioned. On short notice, or on a weekend, how will someone get a licence and tags? What about the weekend hours for Canada Post, if they were to be the distributor for tags?

Gear Type

This topic was discussed during numerous meetings. Why does DFO still require that a Norwegian jigger with only one hook be used? Isn't this outdated now? People stated that this type of jigger is very effective at hooking fish in the mouth, as opposed to requiring a single hook or feather hooks? The single hook seems to foul hook a lot of fish, hooking them in the side rather than in the mouth; thereby, potentially damaging the fish. Participants are seeking a more clear rationale for why the Department continues to require the use of only single hook gear types. It was requested that the Department reconsider this policy and possibly lift this restriction in future years.

Species retention

Numerous speakers at the meetings queried as to why recreational fishers cannot retain a single Atlantic halibut? Some others sought a clear rationale as to why herring retention is also not allowed in this fishery.

Number of tags

While there was opposition to the use of tags, participants expressed divergent views regarding the number of tags required if their use is implemented. There need to be "sufficient number of tags to make the fishery worthwhile" for fishers; otherwise it's too expensive given the cost of fuel. As an example, many fishers off Marystown steam 12 miles off to the fishing grounds.

The 2016 fishery allowed for a maximum harvest of 230 fish per fisher; therefore, “30 to 50 tags are far too few. People supported numerous ranges of tag numbers: 30 to 50, 60, 100, and 230 and above.

Various people wondered if tags could be available in smaller batch sizes as well, so that those who choose to fish for larger volumes have an option available to them to buy additional tags if need be, or if someone was only going fishing for a day and was not certain if there are any fish on the grounds, could they just buy 5-10 tags?

Disabled designations

People requested that the scope of designations be expanded to encompass various medical conditions and to allow designations for senior citizens.

Availability of tags

Numerous questions were posed regarding ease of access to tags in rural areas, on weekends etc. Will selling tags in batches be “too complicated” for vendors? How will the sequential numbers on tags be linked to licences and reporting? People are of the view that DFO must outline these plans in more specific detail.

Multi-year management plan

It was recommended that the Department should announce a 3 year management plan in 2017, to assist people with vacation planning.

Cultural and Heritage significance of this fishery

There is a sense that “overregulating” this fishery will lead to a disappointing sense of cultural loss among the next generation. Emails and public meeting attendees referenced the “right” to access fish, which some view as a “God-given right to fish”. People stated that this fishery is about cultural appreciation and “where we have come from as a people”. “If we are born and bred in Newfoundland and Labrador, it is our right to catch cod fish for our tables.” “Canadians, and specifically citizens of Newfoundland and Labrador, lose a little more of the culture the Canadian government should be striving to protect.”

Concerns were expressed that youth are not active participants in this fishery to the levels that they have been in the past. Relatedly, it was proposed that licence and tags revenues be invested in youth education programs regarding the recreational groundfish fishery.

Concern with the cost of licences and tags

The view was expressed that paying for a licence and tags and fuel is quickly becoming cost prohibitive for something which has always been available for free. Numerous people were of the opinion that tags should be available at no cost, while others supported a fee of no more than \$10 for a licence and tags combined. Caution was expressed that DFO should not make this too restrictive; otherwise there is a risk of people not participating in this fishery. DFO should not “shoot itself in the foot”. “Don’t make it too expensive”, and “be reasonable,” otherwise the result could be a negative impact on rural small businesses selling recreational fishing supplies such as boats, fuel, rods, rain gear, etc. People do not want to have to “buy” codfish as a result of paying costs for both a licence and tags. It was also referenced that pending the price of the tags and licence, “it is cheaper to buy fish rather than fish it yourself. “

Support for the possible implementation of a minimum fish size

Numerous suggestions were provided for reporting harvest and proposed management measures, including addressing high-grading violations by introducing a minimum retention size for cod, perhaps in the <16 to <20 inches size range. It has been suggested that this could be an effective mechanism to counteract the acknowledged, widespread practice of high-grading. (I.e. size selection and returning smaller cod fish to the water). Many long-time recreational fishers strongly feel that any fish <20 inches is simply too small to retain. Requiring retention is felt to encourage high-grading. During one public meeting, an informal show-of-hands vote resulted in at least 50% of attendees supporting this concept.

Others felt that an option should be available to return large breeder fish to the water.

This is a “money grab” for DFO and the Government of Canada

This perspective was noted during most public meetings, and in multiple emails submitted to DFO. Messages included: “...the recreational fisher contributes enough to the economy now without having to pay \$10 for a license and extra fees for tags.” “Tags offerings by DFO for Recreational Summer Fishery should not be a cash grab for Government. Pricey tags will most likely create more poaching offences.” “Our fishery is already monitored by DFO and if this system is needed to help eliminate poaching well the big issue is the holes in the DFO monitoring and they should be addressed first.”

Skepticism regarding Enforcement operations

Numerous people raised concerns about current enforcement and monitoring operations for this fishery. Clarity was sought regarding when the fishing trip is considered to be complete, and

both what rules apply regarding the fish being kept in an identifiable state after processing, and for what duration of time this is required. Divergent views were expressed on DFO doing too much enforcement vs not enough. Some requested that “DFO should ensure there are sufficient monitoring and enforcement resources to provide an appropriate level of confidence in catch estimates derived from this process.” Further, there were repeated suggestions that funds for enforcement should be redirected to other mechanisms to monitor this fishery, including hiring summer students to conduct catch monitoring and reporting on wharves. “Why not hire and train students as Monitors in their community? These Monitors can assist fishers to complete their Log Book.” “Put extra money and resources into enforcement of current rules. Why create a new set of rules that you cannot monitor and enforce because of insufficient enforcement staff.”

Calls to Close the Capelin fishery

Numerous meeting participants and correspondents requested that the commercial Capelin fishery be shut down given the role of Capelin as a forage species and as “the biggest engine that runs the ocean”. “This is a key forage species, for which commercial fishers do not earn significant revenues”. Participants noted that they feel there is a lot of waste seen in the harvesting techniques applied to the Capelin fishery, which is a cause of concern to many. “Capelin the main food source for Cod and other species has been seriously depleted. If you do not address this problem immediately, I fear we will witness a major slowdown of the return of our cod stocks. The Capelin fishery must end!”

Critiques of the Consultations Process

Details of the plan should be more clearly outlined

Challenges were put to the Department in the initial public meetings. Is this plan a “done deal”? Questions were raised as to “how to stop this in its tracks?” Meeting participants and correspondents posed numerous questions to the Department to seek what they felt should be more clear details being provided regarding all management measures.

Criticism of the DFO approach to the consultations process

Some people expressed disappointment with the chosen locations for public meetings. As well, people felt that DFO should have advertised the public consultations process widely, as there was a sense that many people were not aware of the public meeting dates and locations.

There was criticism of what was felt to be a lack of clear answers to questions put to DFO. Also comments were made that the process should have been conducted in reverse order: DFO should have “come out with a plan first”, before consulting the public on the details. Some suggested that because of this, the consultation process was felt to be flawed.

Appreciation for the consultation process

Many speakers at the various public meetings, and numerous email correspondents expressed appreciation to the Department for the opportunity to provide detailed feedback to the Department regarding the proposed plans. “I appreciate the opportunity to express my opinions. I am an avid fisherman and boater and enjoy any time I can spend on the water, so anyway we can manage the stocks and safety of the fishery so my family and I along with future generations can enjoy the tradition of catching a cod fish is a great thing.”