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GREG PRETTY  
*President*

JASON SPINGLE  
*Secretary-Treasurer*

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June 4, 2024

William MacGillivray  
Regional Director General  
Department of Fisheries and Oceans Canada  
Northwest Atlantic Fisheries Centre  
80 East White Hills Road  
St. John's, NL A1A 5J7

Mr. McGillivray,

We thank you again for your time and attention during our recent meeting on May 6, 2024. Further to the remarks made at the end of this meeting, we are writing to express concern for DFO's capacity to effectively monitor and record removals in recreational fisheries and are seeking a commitment to ensure increased and robust monitoring for the entire 2024 fishing season, particularly for recreational fishery removals.

On May 7<sup>th</sup>, Minister Diane LeBouthillier released a statement detailing similar concerns for the level of unreported landings and sales in the commercial east coast fishing industry, citing that accurate information on harvested resources is critical to making sound management decisions. Failing to report, or misreporting, the quantity of fish removed from the water can contribute to declining stocks, and our Union believes that this same consideration must be applied to recreational fisheries because a failure to appropriately monitor recreational removals undermines not only management decisions but the livelihoods of commercial fish harvesters who depend on the health of the stock for economic stability.

Northern cod is recovering – and has recovered in some parts of the stock area - and harvesters are seeing tremendous opportunity for a vibrant and sustainable inshore fishery. One of the ways to protect that sustainable future is to get the recreational fishery under control. Commercial fish harvesters in Newfoundland and Labrador are calling for stricter monitoring and enforcement of the recreational cod fishery in the province to ensure its protection into the future. Recreational


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removals remain a significant source of uncertainty in DFO science and management, as well as blatantly contradictory to the Department's mandate to monitor fish landings and enforce the rules of recreational fisheries.

There is valid uneasiness across our Union for the levels of unaccounted removals in the recreational fishery that threaten the continued rebuilding of Northern cod. Moreover, unaccounted for removals in the recreational fishery are harming cod stocks on the south (3Ps) and west coast (3Pn, 4RS) – both cod stocks are presently in the critical zone. DFO currently does not have the enforcement capacity to ensure sufficient monitoring for greater access to the recreational cod fishery. Monitoring and enforcement of the current recreational fishery is lacking, specifically: daily limits being exceeded with many making multiple trips per day and catching more than the limit; high-grading and wasting of fish; and substantial reports of recreational landings being sold in clear violation of the *no selling, trading or bartering* condition within the recreational fishery.

Sustainable management of groundfish stocks must be a concerted effort across both commercial and recreational fisheries. FFAW is very interested in engaging in a dedicated discussion with DFO about how the Department is scaling up its existing enforcement program using its authorities under the Fisheries Act to require compliance from not only commercial harvesters, but recreational harvesters as well.

Sincerely,

  
Signed by Greg Pretty (2024/06/04) | Verify  
with [verifio.com](https://verifio.com) or Adobe Reader.



Greg Pretty  
President, FFAW-Unifor

CC: Honorable Diane Lebovillier, Minister of Fisheries and Oceans Canada  
Ray Walsh, DFO Director of Fisheries Management  
Brent Napier, Director, Enforcement Policy & Programs DFO  
Sarah Healey, Intern Responsible for Newfoundland and Labrador Region  
Honourable Gudie Hutchings, MP for Long Range Mountains  
Honourable Seamus O'Regan, MP for St. John's South-Mount Pearl  
MP Churence Rogers, MP for Bonavista-Burin-Trinity  
MP Ken McDonald, MP for Avalon  
MP Yvonne Jones, MP for Labrador  
MP Joanne Thompson, MP for St. John's East  
MP Clifford Small, MP for Coast of Bays—Central—Notre Dame  
Honourable Elvis Loveless, Minister of Fisheries, Forestry, and Agriculture NL

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