



GULF NOVA SCOTIA FLEET PLANNING BOARD

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Re: Dockside Monitoring in the Lobster Fishery

Dear Marc,

We have been made aware that the Department of Fisheries and Oceans (DFO) has been meeting privately with dockside monitoring companies, regarding the implementation of dockside monitoring programs (DMP). The issue of dockside monitoring was addressed at the Lobster Advisory Committee meeting on December 4th and 5th, in Moncton NB. Our position, which should be stated clearly in the minutes, is that industry is united against the implementation of dockside monitoring for the lobster fishery in the Southern Gulf of St. Lawrence.

We are well aware that the outdated paper trail data collection program which the department currently is using has its challenges with a 18-24-month delay. In providing actual landings reports.

Here are some of the reason why we believe that DMP is not required at this time

- 1: The Southern Gulf of St. Lawrence lobster stocks are at an all-time high, with healthy recruitment. Since a number of years, it remains within the healthy zone of the precautionary approach. The Southern Gulf Lobster Production Area has been MSC certified.
- 2: We believe that the use of Electronic Logbooks can help to fill current data gaps, without the challenges of a DMP. The DFO has been advancing towards the implementation of E-Logs. The fishing industry is contributing a significant amount of money and resources towards developing and implementing specific E-Log applications for the lobster fishery.
- 3: The lobster fishery is a competitive fishery and does not require the same scrutiny of a quota-based fishery such as snow crab.
- 4: The buyers purchase slips can be used to verify the validity of the electronic reporting.



What is the purpose of this undertaking at this time? Is this a request from DFO Ottawa, DFO Moncton or Revenue Canada?

We know that a dockside monitoring program in the lobster fishery is unfeasible. Our fisheries are plagued with labour shortages fish processing plants. There are already challenges in meeting at-sea observer coverage-in all commercial fisheries which by license condition must have it. In fact, the Snow Crab fishery in areas 12, 12E and 12F currently have 100% DMP coverage. The Snow Crab season operates at the same time as the Gulf spring lobster fishery. Groundfish also require 100% DMP coverage. Under present conditions, it would be very challenging to satisfy an increase in demand for qualified dockside monitors during the spring and summer fisheries in the Gulf. In addition to securing dockside monitors, the management of the program also requires training, administration, data processing, management and more.

DMP will pose significant financial and practical costs on harvesters. In addition to the financial burden, dockside monitoring is likely to add many hours at the end of the long fishing day. This is not feasible or safe during a short season with rapidly changing weather conditions.

In order to maintain the quality of lobster while on the vessel, harvesters recirculate seawater to maintain adequate oxygen levels, temperature and to eliminate the buildup of waste products (ammonia). In some areas, you cannot recirculate harbour water, due to the proximity of adjacent rivers. Water quality can vary due to the diluting effect of rivers. Waiting for dockside monitoring has the potential to lower the quality (and survivability) of lobster, increasing the financial burden of this program on individual harvesters.

Lastly, there are serious concerns related to the intended use of the data collected by dockside monitoring programs. Harvesters need to know that this data is private and protected, that there will be no sharing of data to internally to other government departments such as the CRA.

Ronald Heighton,
Gulf Nova Scotia Fleet Planning Board

This letter is submitted with support from:

Bobby Jenkins, **Prince Island Fishermen's Association**
Martin Mallet, **Maritime Fishermen's Union**
O'Neil Cloutier, **Alliance des pêcheurs professionnels du Québec**