

To Whom it may concern,

The Tuna Charter groups that actively participate in this fishery and the groups seeking involvement in this niche fishery recognize the need for ongoing dialogue and consultation with federal regulators as we continue to grow this innovative industry. Through these discussions it has been stated that from the initial implementation of the current guidelines that some aspects may require change in order to continue to endorse a balanced conservation and business approach. In order for this to happen there is an urgent need to adapt the fishing plan and regulations to meet the intended objectives of the industry. Outlined below are key recommendations for immediate regulatory action to better support the development of this fishery and to aid in the valuable need of scientific research. For clarity some of these proposed guideline changes below are numbered in the same order as they appear on our current section 52 license conditions.

Current wording of section 3.2 in 2015 Section 52:

*3.2 For the purpose of these license conditions, line strength is the maximum stress that a line can withstand while being stretched or pulled before failing or breaking. The minimum line strength permitted on board the vessel and affixed to all gear is 180 lbs/82 kg test strength.*

We would like the wording of 3.2 to be changed to the following:

3.2 For the purpose of these license conditions, line strength is the maximum stress that a line can withstand while being stretched or pulled before failing or breaking. The minimum line strength affixed to tuna rods is 130 lbs/59 kg test strength.

There is a set of rules set out by the International Game Fish Association that are widely accepted within the sport fishing community around the world as promoting ethical and sporting angling practices. These rules establish uniform regulations that allow sport fishers to properly evaluate the degree of their achievements. There are many who prescribe to these regulations whether they are 'taking' a fish, or catching and releasing a fish. By having a restriction of a minimum of 180lb test in our catch and release fishery we therefore cannot promote ourselves as a true 'sport' fishery. We have consulted with industry tackle suppliers and with experts in the use of angling gear such as we use in our fishery, and all are in agreement that regardless of whether the line class is 130, 180 or higher, the reels that are used cannot produce an equivalent pound of drag, and therefore that strength of drag cannot be recognized. We have also concluded that there are many factors that affect the strength of a line such as the quality of the line itself as not all are created equal, the number of times a fish was fought on one line or how long the line was exposed to sunlight. These factors can lead to a low quality overly used high pound test line being far inferior to a good quality well looked after line of a much lower test. We believe a change from 180lb test to 130lb test would have no impact on the fight time or the ability to successfully land a fish; furthermore, this small change would secure our spot as a recognized 'sport' fishery, a designation that pertains to numerous well established big game fisheries around the world.

We also request that section 14.2 be changed accordingly to reflect the change requested for section 3.2.

*Current wording of section 14.2:*

*14.2 For the purpose of these license conditions, line strength is the maximum stress that a line can withstand while being stretched or pulled before failing or breaking. The minimum line strength permitted on board the vessel and affixed to all gear is 180 lbs/82 kg test strength.)*

Current wording of section 4.2 in 2015 Section 52:

*4.2 Any Bluefin tuna brought alongside the vessel shall be tagged in accordance with the procedures identified in Annex G - Tagging Bluefin Tuna during the Catch & Release Fishery and released forthwith in a manner that causes the least amount of harm to the fish. The Bluefin tuna should not be held stationary beside the vessel and the vessel shall remain in gear in a forward motion with the gills and mouth of the Bluefin tuna remaining underwater. At no time shall the tuna be removed from the water.*

We would like the wording of 4.2 to be changed to the following:

4.2 Any Bluefin tuna brought alongside the vessel shall be tagged in accordance with the procedures identified in Annex G - Tagging Bluefin Tuna during the Catch & Release Fishery and released forthwith in a manner that causes the least amount of harm to the fish. The Bluefin tuna should not be held stationary beside the vessel and the vessel shall remain in gear in a forward motion with a portion of the gills and mouth of the Bluefin tuna remaining underwater when the tuna is completely under control. Tuna behavior and appearance during this recovery period will best determine the time of release alongside or behind the vessel using suitable methods to ensure minimal post release mortality. At no time shall the tuna be removed from the water.

It is common knowledge that Bluefin tuna must have water flowing through their mouth and gills but the current wording for section 4.2 does not allow anything but the entire mouth and both gills to be under water at all times. This does not reflect the reality that when hooked with a circle hook, these fish end up at the surface rolled onto one side or another due to the location of the hook in the hinge of the jaw. An ill-timed photo can make it appear that rule 4.2 is being broken, when in fact the motion of the boat and the waves can expose one side of the fish for brief moments. We suggest this section be described differently to eliminate the potential for misleading assumptions that could carry unnecessary consequences. We reinforce proper fish handling within our fishing community on a regular basis and share the knowledge we have gained and experiences with those entering into the industry.

We request that section 15.2 also be changed accordingly to reflect the change requested for section 4.2.

*Current wording of section 15.2:*

*15.2 Any Bluefin tuna brought alongside the vessel shall be released forthwith in a manner that causes the least amount of harm to the fish. The Bluefin tuna shall not be held stationary beside the vessel and the vessel shall remain in gear in a forward motion*

*with the gills and mouth of the Bluefin tuna remaining underwater. At no time shall the tuna be removed from the water.)*

Current wording of section 4.3 of 2015 Section 52:

*4.3 For the purpose of these experimental license conditions, a fishing trip is defined as a voyage that commences at the time a fishing vessel leaves a port to engage in fishing under this license and terminates at the time the vessel returns to port or once the hook-up limit has been achieved as defined in Section 4.4.*

*a) A maximum of one fishing trip per calendar day is authorized.*

We would like 4.3 to be changed to the following:

4.3 For the purpose of these experimental license conditions, a fishing trip is defined as a voyage that commences at the time a fishing vessel leaves a port to engage in fishing under this license and terminates at the time the vessel returns to port or once the limit of any combination of four hook ups or strikes is achieved as defined in section 4.4.

a) A maximum of one fishing trip per calendar day is authorized.

(For supporting arguments please see below.)

Current wording of section 4.4 of 2015 Section 52:

*4.4 For the purpose of these experimental license conditions a hook-up is defined as a fight time that lasts a minimum of 45 minutes or by bringing the tuna alongside the vessel within the timeline of 5 to 60 minutes. After 60 minutes of total fight time, the license holder or registered crew member must take possession of the tuna rod and make every effort to bring the Bluefin tuna alongside the vessel as quickly as possible.*

*a) A maximum of two hook-ups per trip is authorized.*

Current wording of section 4.5 of 2015 Section 52:

*4.5 For the purpose of these experimental license conditions a strike is defined as a fight time that lasts a minimum of 5 minutes up to 45 minutes.*

*a) A maximum of 4 strikes per day is authorized.*

We would like 4.5 to be combined with 4.4, and the wording of 4.4 to be changed to the following.

4.4 For the purpose of these experimental license conditions a hook-up is defined as a fight time that lasts a minimum of 45 minutes or by bringing the tuna alongside the vessel within the timeline of 5 to 60 minutes. After 60 minutes of total fight time, the license holder and or crew member(s) must make every effort to bring the Bluefin tuna alongside the vessel as quickly as possible.

For the purpose of these experimental license conditions a strike is defined as a fight time that lasts a minimum of 5 minutes up to 45 minutes.

- a) Using the definitions in 4.4, the license holder is permitted any combination of strikes or hook ups to a maximum total of 4 per day.

There have been no arguments nor very little disagreement but more importantly it has been well documented and entrenched that the hook and release fishery is allowed 4 strikes per day under our current guidelines. We strongly believe in searching for a balanced approach of tuna sustainability, client experience, weather conditions, forage species availability and general tuna behavior. The rewording of the hook ups and strikes provides a healthier balance of all these important elements combined. For instance, in theory it is much better for the survivability of the fish if the proper care and handling of the tuna is done so accordingly as per sub section 4.2 then having a situation where a tuna is accidentally lost with an amount of monofilament line still attached to the fish. Under our proposed change it actually rewards the angler and the crew in achieving the most desirable outcome which is of course a successfully caught and properly released blue fin tuna. The methodologies by each individual captain and crew to achieve such outcomes would no doubt be enhanced. In essence, by creating more of a sound position of a successful release scenario actually puts less stress on the stock combined with the fact that it would ultimately increase the likelihood of more GBYP tags to be placed on a captured fish which is critical in establishing an abundance study.

We also request that sections 15.3, 15.4 and 15.5 be changed accordingly to reflect the requested changes for sections 4.3, 4.4, and 4.5.

*Current wording of sections 15.3, 15.4 and 15.5:*

*15.3 For the purpose of these experimental license conditions, a fishing trip is defined as a voyage that commences at the time a fishing vessel leaves a port to engage in fishing under this license and terminates at the time the vessel returns to port or once the hook-up limit has been achieved as defined in Section 15.4.*

- a) A maximum of one fishing trip per calendar day is authorized.*

*15.4 For the purpose of these experimental license conditions, a hook-up is defined as a fight time that lasts a minimum of 45 minutes and does not exceed 60 minutes in length or by bringing the tuna alongside the vessel within the timeline of 5 to 60 minutes. Between the 45 and 60 minute timeline every effort should be made by the license holder to bring the tuna alongside before the line is cut at the maximum 60 minutes mark.*

- a) A maximum of two hook-ups per trip is authorized.*

*15.5 For the purpose of these experimental license conditions, a strike is defined as a fight time that lasts a minimum of 5 minutes up to the 45 minute mark.*

- a) A maximum of 4 strikes per day is authorized*

We would like a provision for the following to be created:

Non-resident catching and retaining a Bluefin tuna.

This recreational fishery has been growing since its initiation and holds much promise to continue along this trajectory. Our industry provides private charter services for tourists, many of whom travel from outside Canada to potentially enjoy all aspects of our Atlantic tuna fishing industry. We feel that allowing the ability for this to be part of our license condition would better support the viability of our fishery moving forward. Of course it is recognized and fully understood that all other aspects of the current commercial conditions would be adhered to as part of this proposal.

Current fisheries policy does not allow individuals who do not have a personal fishing license to actively participate in the harvesting of fish in Canada and only those who are Canadian citizens or those who hold a work Visa are eligible to obtain a personal fishing license. While the purpose of this policy is to ensure that those who participate in this industry for a living are licensed to do so, it does not allow for individuals who would like to experience this type of fishing but do not qualify due to nationality or those who simply would like to go out and participate once and have no intention of working in the industry. Numerous commercial fishermen have family, friends and neighbors who cannot legally go aboard and actively participate on a day of harvesting and similarly for any tourists from out of country the same restrictions would apply. Catch and release license holders are now tourism operators, and as such they need to pay attention to the desires of the client. Current tourism trends are indicating that the tourist of today seeks an 'experiential' type of vacation and this has become one of the tourism industry's key words. Clients not only want to experience the thrill of catching and releasing Bluefin, they want to be immersed in the lifestyle and culture of the area and many desire to see how fishermen in our area of the world operate on a regular basis, not just as a tourism activity hence we believe in a mechanism which would permit those non-qualifying individuals to actively participate on harvest days.

In conclusion, we are offering that our at sea observer coverage be increased from 5% to 10% only if all of these proposed guideline changes are implemented for the 2016 season and beyond.

Sincerely,

Kevin MacDougall, president, Tuna Charters Nova Scotia Association

Troy Bruce, president, Prince Edward Island Tuna Charter Boat Association

James Stewart, representative, North East New Brunswick Charter Boats

Renaud Camirand, Chargé de projet, Regroupement des pêcheurs professionnels du sud de la Gaspésie

Gerard Chidley, Representative, Newfoundland Large Pelagics Fleet