



January 8, 2025

RE: Newfoundland and Labrador Recreational Groundfish Fishery Survey

Dear Minister Thompson,

On behalf of the Fish, Food and Allied Workers Union (FFAW-Unifor), thank you for the opportunity to provide input on the management of the Newfoundland and Labrador Recreational Groundfish Fishery for the 2026 season. The recreational fishery is deeply important to the social and cultural fabric of our coastal communities, but it must be managed in a way that promotes the rebuilding of cod stocks and supports the long-term viability of commercial fisheries.

FFAW-Unifor is increasingly concerned that the current structure of the recreational fishery (39–45 open days in recent years, with no licence, tag, or mandatory catch reporting requirements) means that removals are roughly estimated, at best, rather than directly measured. Given that recreational removals of cod now represent a significant portion of total fishing mortality, ***FFAW-Unifor strongly recommends that DFO implement a robust framework to track catch and effort.*** Accurate information on all removals – including any at-sea high-grading in the recreational fishery – is essential to ensuring that combined commercial, Indigenous, and recreational removals remain consistent with management and rebuilding objectives for all cod stocks in Newfoundland and Labrador waters.

FFAW-Unifor members have fundamental and ongoing concerns about black-market sales of cod caught in the recreational fishery. One only needs to look to online marketplaces to see the vast quantity of black-market fish for sale to the public. While DFO has clearly stated that this is a non-commercial fishery intended for personal use, the lack of monitoring and enforcement is a continued risk to the integrity of the commercial fishery, and frankly, the reputation of DFO Fisheries Management; ***given that the recreational fishery has been referred to as an Illegal, Underreported, and Unregulated Fishery (IUU) during sustainability label discussions.***

At the Groundfish Advisory Committee (GAC) meeting in 2024, the Department delivered a presentation on the Fishery Monitoring Policy as a component of the Sustainable Fisheries Framework. As stated in that presentation, Fishery Monitoring is important because it supports fish stock assessments, informs fishery management decisions, ensures sustainable fishing practices, etc. Priority stocks for the NL region were also identified in

that presentation: 3Ps cod, 2J3KL cod, 2J3KL capelin, and snow crab. It was noted in that presentation that the Fishery Monitoring Policy applied to **all** removals (i.e., not just from the commercial fishery). ***DFO is not fulfilling the mandate of Fishery Monitoring Policy by continuing to estimate removals solely through the recreational fishery mark-recapture tag returns.***

FFAW-Unifor is strongly urging DFO to take concrete action on this issue, including targeted enforcement and clearer public messaging that sale of fish from the recreational fishery is prohibited. ***Addressing illegal sales is critical to maintaining public confidence in management, protecting the integrity of licensed commercial enterprises, and ensuring that conservation measures are not undermined.*** Removing the financial incentive for breaking the rules of the recreational fishery will reduce such activity. If people lose the sale for that illegal fish, then the incentive to land more fish than is permitted is greatly reduced.

From FFAW-Unifor's perspective, the rules for the recreational groundfish fishery must clearly ensure that this is a fishery for food, not a de facto commercial or income-supplement fishery. Current daily and boat limits, combined with a lengthy season and the absence of licences, tags, or reporting requirements, create incentives for some participants to treat the fishery as a regular source of cash income rather than provisions for household consumption. Many Newfoundlanders and Labradorians rely on the recreational fishery for food security, and this objective can be achieved while still maintaining a clear separation from commercial activity by improving tracking of removals, tightening measures where necessary in the most vulnerable stock areas, and enforcing the prohibition on sales in a fair and consistent manner.

These changes are essential to protect the livelihoods of licensed commercial harvesters and plant workers represented by FFAW-Unifor, whose income and safety depend on a sustainable and fairly regulated cod fishery.

Thank you again for the opportunity to participate in this consultation process and for considering the recommendations of FFAW-Unifor as you develop management measures for the 2026 season and beyond.

Sincerely,



Dwan Street
President, FFAW-Unifor



Jamie Baker
Secretary-Treasurer, FFAW-Unifor