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Mr. Chairman:

1995 Strategic Conservation Framework for Atlantic Lobster

Issues:

Attitude of DFO officers, their initiatives seems to be more short term responding to issues rather than long term. Also is it true that when they make court appearances they are actually giving up 'free time' to prosecute offenders; if so they actually should be given additional time off to compensate them for their efforts.

Funding seems to be generic to the department and fluid as the financial year progresses. If you want specific conservation you need to allocate specific/ non transferable funds to address the situation.

The current tag identification system is a joke; it allows for fishers in adjacent fishing zones to trade tags, ensuring overfishing of areas. What is needed is a highly visible permanent tag of at least three separate colors so adjacent fishing zones will have their own unique color. Secondly allowing fishers to declare gear lost and be given replacement tags only encourages the temporary loss of fishing gear - legalizing overfishing.

Replacement tags can be issued when all gear is on the wharf allowing for inspection by dfo officers...

In our area overlap fisheries have proven itself disastrous to lobster stocks.

Issuance of personal use scallop licenses to recreational divers only encourages the looting of marine resources. The economic return to dfo is significant; the surveillance is zero, and consequences are hugemongous.

There is regulations in place that restrict the use of gillnets to a minimum depth of water. These regulations for all gillnet fisheries are not enforced by dfo. The minimal depth should be 10 fathoms, any fisheries for groundfish inside of 10 fathoms should be restricted to 'fish pots' exclusive. The observance by fisheries observes off Belloram, Fortune Bay : lobster count of in excess of 100 lobsters per

fleet of cod nets, only reinforces the argument that entanglement kills all not just the directed for specie.

Scallop dragging inside of 20 fathoms within a distance of 5 miles from shoreline should be permanently banned. What the scallop rake rolls , pushes and gathers all in its path. At any time of the year such activity is disastrous to all marine life forms, but especially when lobsters are preparing to , engaging in molting/ breeding activities the results is extinction.

The concept where a fisher can direct for more than one species from separately registered fishing vessels; on the same enterprise license, within the same twenty four period needs to be immediately terminated. The regulation that should be in place is that a fisher would be restricted to fishing one specie within a distance of twenty miles of land in any given week. The situation we have is that numerous enterprises with supplementary crab licenses also possess lobster licenses and additional licenses held by family and crew members. So you have a 45 > vessel owner directing his larger vessel offshore while fishing inshore either in his wife, children fishing enterprise. The great majority of these also designate other individuals to fish there larger boats for them offshore. We are seeing super concentrations of fishing into a few communities with fishing efforts from these communities impacting the local resources, ensuring conflicts within the community as well as conflict with adjacent fishing communities.

If dfo wants conservation of marine resources the order must be that an enterprise will be allowed only to direct for one specie in any given week.

Allan G. Nolan