

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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Transport Canada
330 Sparks Street
Ottawa, Ontario
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Subjects: Modernizing Pleasure Craft Licensing
Modernizing the Pleasure Craft Operator Competency Program

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers and supporters, and 725 member clubs. We appreciate the opportunity to provide comment on Transport Canada's (TC) proposals for "modernizing pleasure craft licensing," and "modernizing the Pleasure Craft Operator Competency (PCOC) Program," and would like to highlight the following points for consideration.

Perspectives from anglers, hunters and trappers

The proposal to implement a \$15 fee to process an application to obtain, renew, transfer or duplicate a Pleasure Craft Licence (PCL) will not be viewed favourably by many anglers, hunters and trappers. Additionally, these stakeholders have voiced their displeasure with the proposal to reduce the timeframe for owners to notify of a name or address change, or for the buyer to notify of a sale or transfer of a vessel, from 90 days to 30 days.

These proposals would increase the financial and administrative burden on the boating community. If TC insists on proceeding with these proposals, they must be supported by continued outreach and engagement throughout the consultation process to ensure anglers, hunters and trappers are adequately informed and aware of the changes. We recommend that during the first year, TC allow for some leniency (i.e. grace periods, warnings, notifications) when a PCL holder fails to apply or renew, and if owners or buyers do not provide notification within the 30-day window. We also recommend that TC follow through on the regulatory amendment to include sending reminders or notices to PCL holders to let them know renewal is approaching, including sending specific notices to existing 10-year and lifetime PCLs when they are transitioned into the new 5-year validity regime.

TC should communicate with all PCL holders on the importance of updating their licence and how they can do it, as well as maintaining current and exploring new avenues for the PCL holder to do the updates.

5-year expiration for PCLs

TC is proposing a 5-year expiration period for all PCLs. Not only will pleasure craft owners be required to apply/renew more regularly (they previously had 10-year or no expirations), but they will also be required to pay a \$15 service fee each time. These are two changes that would not be supported by many in the outdoor community if done separately, and making these changes concurrently will only exacerbate the issue for many anglers, hunters and trappers.

The OFAH recommends that TC retains the existing service standard that a new, renewed, transferred or duplicate PCL will be emailed or mailed within five business days of receipt of application, provided the application is complete and all supporting documentation is attached. Moving forward with the 5-year expiration period for PCLs, we would also like for TC to consider implementing an extension period for expired PCLs. This is especially important during instances of backlogs of licence processing, such as what was experienced by some government agencies during the COVID-19 pandemic with licensing applications and renewals.

Consultation and engagement with “key stakeholders”

The proposal references an economic impact study commissioned by TC titled, *Establishing Owner-Financed Cleanup Funds and Introducing Service Fees for Pleasure Craft* (January 2, 2019), and highlight that the findings indicate that introducing modest fees for pleasure crafts would have no discernable impact on boat owners’ purchases of pleasure crafts or on the continued operation of existing pleasure crafts. The purpose of this report is to understand the perspectives of key stakeholders in the boating sector; however, this conclusion does not provide an accurate representation of what was presented in the report.

The report states that only a modest number of stakeholders were engaged, and that the interviews conducted “do not constitute a comprehensive survey of the boating community.” The report goes on to describe that it was not possible to make an accurate assessment of the potential impacts the introduction of a fee would have, and that the information analyzed was difficult to validate and was “largely anecdotal in nature.” Because of the limited information and conflicting perspectives, it is difficult for us to come to the conclusion that the \$15 PCL service fee will not, to some degree, impact boaters.

Understanding impacts to anglers, hunters and trappers

The OFAH acknowledges that a \$15 fee may appear to be minor, but what may be challenging to capture in an economic impact study are the cumulative effects of expenses needed to participate in these outdoors activities. Anglers, hunters and trappers spend a significant amount of money on equipment, maintenance and upkeep, licences, fuel and other costs. With no defensible evidence to suggest that a \$15 fee would not impact these communities, then there is a possibility that some boaters could potentially be negatively affected by the fee proposal.

The report also fails to elaborate on the impacts to new boaters and the fees associated with the PCOC program. Introducing a \$5,000 accreditation application fee that course providers need to pay every five years and implementing an additional \$8.50 access fee for maintenance and test materials for each Pleasure Craft Operator Card issued will force agencies to recover those costs from prospective PCOC holders.

Under these proposals there will be unknown and increased costs to acquire a PCOC, and additional costs associated with PCLs, and the impacts that this will have on key stakeholders like anglers, hunters and trappers, have not been adequately evaluated. Barriers to participation have overarching implications with provincial revenue mechanisms that support fish and wildlife management, including funding that goes into Ontario’s Special Purpose Account. In Canada, there are approximately 2.97 million anglers, 1.27 million hunters and 45,000 trappers. Many of these people are also boat owners and are represented by numerous conservation organizations that advocate on their behalf like the OFAH. Outdoors communities and agencies need to be directly consulted, engaged and included in these discussions, and if TC moves forward with the fee proposals, there must be direct benefits to anglers, hunters, trappers and the broader boating community.

Enhancing TC boating programs

TC states their commitment to modernizing boating services and delivering value to Canadians, and we would like to hold them accountable to these promises. The PCL application fee and the proposed changes to the PCOC program are predicted to generate approximately \$1.8 million/year and \$1.36 million/year in revenue, respectively. These funds must be earmarked towards enhancing boating services, including but not limited to:

- finding program efficiencies, improving data quality and strengthening administration;
- providing better oversight and management of TC boating programs;
- improving the accuracy of and updating information in the Pleasure Craft Electronic Licensing System;
- streamlining and creating a user-friendly system for PCL applications; and
- providing better communication to PCL holders on the application process.

The most critical and significant consideration for TC is how funds will be used to support the “modernization” of the programs and how dollars invested by boaters could go back into improving and enhancing boating as an important social and economic activity in Canada.

Infrastructure grants and conservation initiatives

It is our understanding that the revenue generated under the fees for the PCL and PCOC programs must be used to offset the costs and related expenditures incurred by TC. As such, the revenue collected under these programs cannot be redirected to other purposes, such as to subsidize other TC or federal government programs. That said, TC was responsible for drafting rules to prevent ecological and environmental problems resulting from the discharge of ballast water, and similarly, attention should be directed towards addressing unwanted introductions through the recreational boater pathway.

The OFAH recommends that the federal government explore opportunities to create a framework for how earned revenue from boaters (e.g. TC licensing dollars after expenditures, or dedicated apportionment of federal gas tax) could be used for boating-related infrastructure projects (e.g. boat launch development or maintenance) and aquatic invasive species (AIS) prevention/mitigation (e.g. specifically target boaters and promote initiatives to help conserve our aquatic environments). For example, the OFAH has worked in partnership with the Ministry of Natural Resources and Forestry (MNRF) and the Department of Fisheries and Oceans (DFO) to deliver the Invading Species Awareness Program (ISAP). Like the Government of Canada, we recognize that transient watercraft are a potential vector for the spread of AIS, and investments made towards initiatives such as ISAP will reduce the introduction or spread of AIS that threatens the environment, the economy and society, including human health. Boaters should see that revenue generated from their activities is helping to enhance the Canadian boating experience, and investments in boating-related infrastructure and environmental programs would produce long-term benefits for all Canadians.

Closing remarks

Communicating that additional fees will not impact boaters is cause for concern when the evidence suggests that there is a lack of meaningful data and information to base that assessment on. Better outreach, consultation and engagement would help with these unknowns and uncertainties, particularly with the outdoors community. There is an opportunity to redirect the displeasure we have heard by reinvesting the funds gathered through the fee proposals. This can be achieved through demonstrable actions and evidence; enhancing boating programs and services and bringing true value and benefits to boaters. We urge TC to be open, transparent and accountable to these funds. Thank you for your consideration of our comments.

Yours in Conservation,



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