

ONTARIO FEDERATION OF ANGLERS & HUNTERS

P.O. Box 2800, 4601 Guthrie Drive, Peterborough, Ontario K9J 8L5
Phone: (705) 748.6324 • Fax: (705) 748.9577 • Visit: www.ofah.org • Email: ofah@ofah.org



Ontario Conservation Centre

OFAH FILE: 333B
June 13, 2023

Honey Walsh, Chief
Office of Boating Safety
Marine Safety and Security
Transport Canada
Place de Ville, Tower C
330 Sparks Street
Ottawa, Ontario
K1A 0N5

RE: Canada Gazette, Part I, Volume 157, Number 19: Regulations Amending the Small Vessel Regulations

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. Through the Canada Gazette, Transport Canada has posted their proposed amendments to the Small Vessel Regulations (SVR); however, the changes do not appear to reflect previous stakeholder feedback in a meaningful way. We provide further insight into a previous economic impact study and make recommendations to better accommodate the boating community, including reinvesting revenues in ways that benefit Canadian boaters and the environment.

Greater consideration of stakeholder feedback

In 2020/21, Transport Canada conducted public consultation on proposed changes to pleasure craft licence (PCL) requirements and followed up with a summary report on the feedback titled "*What we heard: Public consultation on modernizing pleasure craft licensing.*" The OFAH reviewed and cross-referenced the document with the latest PCL updates to assess how public input was considered, and remarked on the following:

- Transport Canada's plan to establish a five-year validity period for all PCLs ignores the results of their own public consultation as the majority of respondents opposed this proposal.
- While there wasn't clear consensus amongst stakeholders, Transport Canada aims to maintain the reduced timeframe to provide a change of information (i.e., name, address) from 90 to 30 days.
- While approximately half of stakeholders opposed the fifteen-dollar fee for a new, renewal, transfer, or replacement PCL (as cited in the original proposal), Transport Canada is not only maintaining the fee, but increasing it to twenty-four dollars.

There were also mixed feelings from the public about other proposals (e.g., expanding the SVR to include wind-powered pleasure craft above 6 m in length) and, although we appreciate the ongoing engagement by Transport Canada, it comes across as disingenuous when the opinions expressed by stakeholders are not adequately reflected in the latest consultations.

Increasing service fees without knowing the impacts

Between 2024 and 2033, this program is anticipated to cost \$39.28 million, roughly ninety percent of which would be assumed by Canadian PCL holders. Although Transport Canada believes the original fee would have no impact on boat owners' purchases or continued operation of pleasure crafts, the evidence suggests otherwise.

It is important to note that the 2019 economic impact study commissioned by Transport Canada is not a comprehensive study and does not reflect the boating community as a whole. At one point, the study even asserts that it would not be possible to make an accurate assessment of the potential impacts of the proposed fee. Only a modest number of stakeholders were engaged for this study, and the information analyzed was difficult to validate as it was largely anecdotal.

As such, the OFAH does not feel the potential impacts of increased service fees have been adequately considered. Moreover, in just a few years, a sixty percent increase to the PCL fee combined with a clause in the SVR that would allow Transport Canada to “adjust the fee annually for inflation” is concerning. A regulatory charge under the proposed Vessel Remediation Fund would also be collected concurrently, and in addition to, the service fee for PCLs. How these changes will impact the fee and boaters remains unclear.

Making investments in boating across Canada

PCL holders generate significant revenues through direct and indirect expenditures that support various government services and programs across Canada. In 2015, more than 12 million Canadians participated in boating and, the following year, spent approximately \$5.7 billion on boating trips (National Marine Manufacturers Association).

Although boaters will certainly be displeased when it is evident that Transport Canada is planning to implement a PCL fee, their reactions could be tempered by leveraging earned revenue from boaters (e.g., Transport Canada licensing dollars after expenditures, or dedicated apportionment of federal gas tax) to enhance boating services and programs.

What would be perceived as taking away (or even a “cash grab”) could be framed differently if Transport Canada invested more in boating-related infrastructure projects (e.g., building/repairing boat launches, better parking) and investing in aquatic invasive species (AIS) prevention/mitigation initiatives related to the boater pathway to help conserve water resources (e.g., boat washing stations, AIS education-outreach-awareness campaigns, Invading Species Awareness Program).

Closing remarks

Owing to the database’s tendency towards inaccurate, outdated, and incomplete information, we acknowledge that there is value in improving the Pleasure Craft Electronic Licensing System. However, it does not appear like Transport Canada has adequately considered public feedback in developing an approach to addressing this issue. This gives the impression that consultation is more of a box-checking exercise as opposed to meaningful stakeholder engagement.

A more rigorous, comprehensive economic impact study that assesses the various demographics within the Canadian boating community, including anglers, hunters, and trappers, would go a long way to informing any proposed changes. Boaters come from all backgrounds and financial situations and, with the increased cost of living, equipment, fuel, licences, and other purchases needed to participate in outdoor recreational activities already, any additional costs could be the tipping point for many Canadians.

We look forward to following the Government of Canada’s approach to this topic and, hopefully, the reinvestment of revenues back into boating, boaters, and the conservation of our water resources. Thank you for your consideration of our comments.

Yours in Conservation,



Adam Weir
Fisheries Biologist

AW/jb

cc: OFAH Board of Directors
OFAH Fisheries Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Director, Policy & Programs
Mark Ryckman, OFAH Manager, Policy
Chris Robinson, OFAH Manager, Programs
OFAH Policy & Programs Staff