

Submission to the Lands Act Review regarding Trapper Cabin Policy

Newfoundland and Labrador Trappers Association

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Historically, there has been neither consistent overall policy nor clearly established guidelines with regard to trapper cabin administration in Newfoundland and Labrador. Anecdotal evidence received from NLTA members suggests that there is much variance in administration tactics applied by regional offices. In a number of cases, officious and discriminatory decisions have been applied against trappers. The bulk of such complaints have been directed toward central Newfoundland.

It is widely believed that a resource-based commercial trapper cabin in this province shall not be larger than 100 sq. ft. in area (i.e. – 10 feet by 10 feet). Previously, trappers paid an annual fee of \$5 plus HST as an annual rental. Some years ago, this was raised to \$100 plus HST. We are now paying a similar rate as does a recreational cabin owner, who has no limitations on building size and can have outbuildings. We have heard of trapper accounts where in one case, a trapper was discouraged from applying for a trapper cabin and encouraged to apply for a remote recreational lease in order to avoid this size restriction. In one other incident, a trapline cabin measuring 10 feet by 12 feet was ordered to be reduced to 10 ft. by 10 ft. or a removal order would be issued.

In the case of many remote traplines, a well-equipped cabin with allowances for good hygiene is an essential component of the business. This is recognized by a growing number of Canadian provinces, notably Alberta, British Columbia, Manitoba, Ontario and Quebec.

In most of these provinces, a trapper is entitled to a main “base camp” cabin and a series of “line camp” cabins (known locally as “tilts”) placed strategically along the trapline. Adequate structural dimensions are afforded by these other provinces. This number of line camps is variable depending on trapline size and mode of access. There is minimal, if any, fee to cover the permitting of such a series of cabins. These structures are an essential tool of a commercial trapline, and can mean the difference between life and death in the event of a mishap.

In this province, each cabin requires its own individual permit, at an annual cost of \$113. We contend that this is an unfair fee structure, and that this province recognize that a trapline including a base camp and associated tilts be recognized as one enterprise and subsequently be billed as a single Permit To Occupy. Factoring in weather, fur market conditions and operating expenses, fur trapping is a highly speculative occupation often with marginal income above operating costs. A high cabin/tilt rental fee can impose a significant expense during marginal income seasons. A single, reasonable Permit To Occupy fee that covers all structures on the trapline enterprise must be applied. NLTA has recently been involved in attempting to resolve such a discrepancy on behalf of one professional trapper here in Newfoundland.

Ontario in particular, with its 8 page policy paper on Trapping Cabins on Public Land (http://www.mnr.gov.on.ca/stdprodconsume/groups/lr/@mnr/@crownland/documents/document/mnr_e000085.pdf), demonstrates a thorough understanding of the commercial trapping industry. In addition

to allowing a large main cabin, smaller overnight shelters are permitted. Additionally, outbuildings for the storage of animals, fuels, etc., are permitted.

From an occupational health and safety perspective, Quebec also recognized the need for outbuildings on traplines for animal storage and skinning, separate from the living and food preparation area of the trapper. This allowance apparently resulted following disease exposure to tularemia by several Quebec trappers skinning beavers in their cramped living area.

Presently there approximately 2,500 general trapper licences sold annually in this province. There are also approximately 400 beaver trapline licences sold annually in Newfoundland. In most cases, beaver trappers also trap other species under authorization of a general trappers licence. Of this 2500 number, we believe that over 50% are actively trapping. Of this number, we believe that about one half would be considered professional, commercial trappers. We acknowledge the need to enact guidelines to ensure that trapping cabin privileges are not abused. We do not, however, support the use of a minimal annual fur production value as the deciding criterion. The fur trade is subject to frequent high and low pelt values. A current example would be the recent average pelt price for beaver of approximately \$16. A trapper could theoretically harvest an above average harvest number of beaver (30, for example) and still not achieve what we have been led to believe is the present guiding criterion (\$500/season). As speculators, trappers may decide to withhold part, or all, of a season's harvest and offer this for sale at a future time. In such cases, a trapper may show zero income for that particular year. Quebec has initiated a ranking system that uses a minimal harvest number of pelts per number of species over trapline size as their guiding criterion, and we suggest that NL adopt a similar approach.

Possibly the greatest aggravation beyond the present ad-hoc and autocratic administration of trappers cabins, as revealed by our members, is our inability to engage in an appeals process to resolve outstanding issues. There appears to have been a pervasive air of omnipotence and arrogance exhibited toward a number of our members. This is probably a result of a general ignorance of and indifference to the trapline business and its requirements by the involved Lands Manager. We suggest that this can best be rectified by implementing a working group between Lands Division and the agency responsible for trapping, the Wildlife Division. Such a liaison could review outstanding trapper issues, and meaningful and considerate resolutions could be achievable by combining the various perspectives.

NLTA initiated a trapper cabin policy review over one year ago in February 2014, by way of a letter to then Minister Joan Shea. Despite early assurances to the contrary, we have yet to be contacted by the Lands Division regarding our concerns. We wish to go on record as stating that we wish to examine, and where necessary suggest revisions to, any draft legislation relating to the matter of trapper cabins that may arise out of this recently announced Lands Act Review process.

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