

October 3, 2016

PRIORITIES FOR AN ABUNDANT NORTHERN COD FISHERY

Presentation to the House of Commons Standing Committee on Fisheries and Oceans



INTRODUCTION

Good afternoon and thank you very much for the opportunity to speak to you. My name is Josh Laughren and I am the Executive Director of Oceana Canada. With me is Dr. Robert Rangeley, our Director of Science.

Oceana Canada was established in 2015 as an independent charity and is part of the largest international group focused solely on ocean conservation. By restoring Canada's oceans, we can strengthen our coastal communities, reap greater economic and nutritional benefits, and secure our future food supply.

Seafood must be a big part of the solution in feeding a growing population. Wild seafood requires minimal fresh water to produce, emits little carbon dioxide, doesn't use up arable land, and provides healthy, lean protein at a cost-per-pound lower than beef, chicken, lamb or pork. Our oceans can, if properly tended, provide a nutritious meal every day for nearly a billion people. This doesn't just make us pro-fish, it makes us pro-fishing.

We have copies of our recent report, *Here's the Catch: How to Restore Abundance to Canada's Oceans*, the most comprehensive and up to date public analysis on the status of Canadian fish stocks. Please do not hesitate to contact us with any comments or questions.

BACKGROUND

Here are some facts almost everyone appearing before the committee has agreed on:

- There are signs of a fragile but broad-based recovery for the Northern cod stock, fuelled in part by increased abundance of capelin and improving environmental conditions. This is good news.
- The Northern cod fishery of the future will not be that of the past, and must be based on quality not quantity.
- The stock is only at about a third of the way to its lower reference point, with no certainty about the rate at which cod will continue to recover.
- We must all be very careful to safeguard this recovery, while planning for the kind of fishery we want to build.

So, how do DFO and others ensure the return of this fishery? We have four observations and five recommendations to address this.

OBSERVATIONS

1. There is still no rebuilding plan for northern cod 25 years after the moratorium

Kicking off the hearings, DFO officials said there was a rebuilding plan, but later elaborated that really there was a *process* to develop a plan, with no timeline given. Robert and I, along with many others, including The Royal Society of Canada's report, *Sustaining Canada's Marine Biodiversity*, have been asking for such a plan for more than 10 years.

If you comb through all the science and management documents you'll find that fundamental elements of a rebuilding plan are not in place: no rebuilding targets or timelines or decision rules.

Other than the lower reference point, none of the Precautionary Approach requirements outlined in the Integrated Fisheries Management plan for 2+3KL Groundfish are in place for Northern cod: DFO has not identified the three status zones and an upper limit reference point; they have not set the removal rates for each zone; nor are there pre-agreed decision rules.

Establishing an upper reference point is complicated in this case, but also very scientifically achievable. We committed to it under the UN Fish Stocks Agreement, and it's required under the Marine Stewardship Council standard. It is, however, highly contentious because establishing one forces difficult but necessary decisions, such as what historical baseline to use for recovery. One can only conclude that the reason we don't have a target 25 years later is because DFO has decided not to set one.

This lack of an upper reference point or any target for rebuilding has significant consequences. **Without it, the lower reference point effectively becomes the rebuilding target.** You heard from DFO officials who characterized reaching this point – defined as the point we should avoid at all costs – as the stage when the fishery can be reopened, if cautiously.

We hear it when people quote DFO model estimates and assert that we could significantly increase the harvest today without much risk of decreasing stock size – without reference for how it will affect where we *want* the stock to be. This is dangerously close to the textbook definition of sustainable overfishing: ensuring stocks have little chance of growing beyond their depleted state, thus vastly underperforming economically and ecologically.

Reaching the lower reference point, not a rebuilding target, has come to define success. It's a safe bet that without an appropriate rebuilding target, the pressure to significantly increase the fishery will become insurmountable before the stock ever reaches the lower reference point. If this happens, we risk squandering an opportunity to rebuild a truly healthy commercial fishery for another generation.

2. We don't have a rebuilding plan because the *Fisheries Act* doesn't require one

Canada has few formal rebuilding plans, despite a policy commitment to establish them. In several cases, including with cod and redfish, we allow directed fisheries to continue fishing stocks in the critical zone. The reason is simple: unlike in some other jurisdictions, the law does not require us to rebuild stocks. Recommendations of the FAO, the Royal Society of Canada report and research in other jurisdictions all show that recovery is more effective when a recovery plan is legally mandated and automatically triggered at pre-defined stages.

This Committee will be conducting hearings on incorporating modern safeguards into the *Fisheries Act*. We argue that there is no single recommendation that this Committee could make that would do a better job of rebuilding cod, and indeed every other depleted stock, than amending the *Fisheries Act* to include a duty to rebuild. We hope to appear before this Committee to discuss this.

3. Northern cod management is opaque.

It is impossible for anyone but a determined expert to understand the true state of Northern cod, how DFO is managing current fishing, its objectives and how decisions are made.

DFO has noted that all the science documents are in the public domain. Let's take a look at this. The Integrated Fisheries Management Plan is only available on request, and you have to forage through Canadian Science Advisory Secretariat reports and management plans over many years, cross-referencing national frameworks, just to determine the objectives and decisions and identify gaps, or to even determine if there is a rebuilding plan or an upper reference point.

Key information used in decision-making is withheld, such as the Fisheries Checklist (now called the *Sustainable Fisheries Survey*).

We are, however, encouraged by the commitments to transparency in the Minister's Mandate Letter, and by early steps to better organize public information. We and others have been calling for the release of the *Sustainable Fisheries Survey* as an urgent priority.

4. We have 5-10 years to develop a vision and plan for the future of the fishery

You've heard that if current positive trends continue, Northern cod may reach two-thirds of the lower reference point in three years. It will likely be 5-10 years until the stock clears the critical zone, before a harvest increase should be contemplated. We wish it were faster, but the silver lining is that we have at least five years to implement a rebuilding plan that outlines the kind of fishery that benefits Newfoundland and Labrador communities.

There is a lot of cod in the global market, and to be competitive will require a focus on sustainability and quality. There have been exciting and successful projects using cod pots and line-caught cod, and these low impact gear types should be strongly promoted in any new fishery. We recognize that with innovation comes quantifiable transition costs, and that new investment is needed. The payoff will be substantial.

If this sounds like a long time, it's not. We're already 25 years in. Let's take advantage of the urgency and ambition that has come with the positive signs of recovery to spur science and investment in building the sustainable fishery coastal communities want and global markets demand.

RECOMMENDATIONS

The observations we've noted today – the lack of a rebuilding plan and transparency, and the opportunity to develop a plan for a future fishery – lead to five specific, critical recommendations. In each case, these are consistent with what is already required, but not implemented, under DFO policy:

1. Develop a rebuilding plan based on the best available science that includes target reference points and timelines. Stick to it until new and reliable data becomes available.
2. Ensure we manage carefully for prey availability, especially capelin, and factor in ecosystem considerations like habitat protection and climate change.
3. Keep removals from all sources at the lowest possible level, at least until the stock clears the critical zone, and make decisions consistent with rebuilding targets.
4. Make the rationale for management decisions transparent, and publish DFO's *Sustainable Fishery Survey*.
5. Invest in and give priority to gear and harvesting methods proven to increase quality and reduce bycatch and other ecosystem impacts.

We can leverage many positive recent developments, including a reinvestment in science and scientists, a commitment to openness and transparency, and a Sustainable Fisheries Framework that is ready to be fully implemented. We have a number of exciting and entrepreneurial developments in the fishery and tremendous passion and commitment from those closest to the resource.

Every experience here and around the world shows that when you follow the science, and set and stick to targets, stocks recover and people reap the benefits. The Northern cod fishery can be rebuilt and once again contribute enormously to the health of coastal communities and the global food supply.

Thank you for your time. We're happy to take any questions.

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