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# OCEANA CANADA'S RECOMMENDATIONS FOR ATLANTIC MACKEREL (NAFO AREA 3+4)



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CC: Jenness Cawthray  
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Dear Mr. Williams,

As recent observer at the Atlantic Mackerel Advisory Committee meeting, I am writing today regarding upcoming management decisions pertaining to the Atlantic mackerel stock (NAFO area 3+4). This past year, Fisheries and Oceans Canada (DFO) took significant steps to restore the critically depleted Atlantic mackerel stock. These included the closure of both commercial and bait fishing and the designation of the stock under the Fish Stocks Provisions of the modernized Fisheries Act, which mandates the development of a more robust rebuilding plan. In addition to maintaining the closure, we call on Fisheries and Oceans Canada to strengthen this stock's rebuilding plan by including targets and timelines to bring it back to healthy levels and implement the Fishery Monitoring Policy to ensure we have the dependable information required to support sustainable fisheries management.

Oceana Canada appreciates the opportunity to participate in the process, and respectfully recommends the following management actions:

1. **Continue the closure** of the commercial and bait fishery to enable the highest likelihood of accelerated rebuilding and minimize long-term socioeconomic costs;
2. **Implement a revised rebuilding plan** that meets the requirements of the Fish Stocks provisions under Section 6.2 in the amended Fisheries Act (2019) and in the Fishery (General) Regulations by the end of the year;
3. **Implement the Fishery Monitoring Policy for all future commercial, bait and recreational fisheries** to improve data availability and ensure that the total fishing mortality from all sources does not exceed the harvest control rule or removal reference.

The Atlantic mackerel stock has remained in the Critical Zone since 2011, has so far failed to recover due to overfishing and mismanagement. Commercial quotas for Atlantic mackerel exceeded Science advice in several instances over the past decade, and the stock reached its lowest spawning stock biomass (SSB) in 2021. In 2022, the SSB was estimated

at just 42% of the Limit Reference Point (LRP). The most recent stock assessment provides supporting evidence that retaining a commercial moratorium is the best scenario for fast and positive biomass growth above the LRP. The stock can rebuild above its LRP in 6-7 years without fishing and there is a high likelihood (78.5%) that the stock will experience positive biomass growth over the next two years. Although rebuilding efforts may impose temporary costs on fishers and coastal communities, it's important to recognize that the absence of such efforts and effective fisheries management have caused substantial losses in terms of food, employment, and income over the past few decades. When considering the thousands of individuals in coastal communities who rely on fish stocks for sustenance, culture, and social values, the benefits of rebuilding become even more significant.

Not only does the best available science provide evidence for maintaining a closure of the commercial and bait fisheries, but the legislation and policy guidance aligns with this measure. The Fishery (General) Regulations states in Subsection 70 (5) that while the rebuilding plan is being developed, “the Minister shall ensure that the level of fishing of the stock during that time is consistent with the rebuilding of the stock above the limit reference point”.<sup>1</sup> The guidelines for rebuilding plans emphasize following DFO’s 2009 Precautionary Policy that states “removals from all sources must be kept to the lowest possible” and “management measures must have a high likelihood (75-95% probability) of the stock growing to the rebuilding target”.<sup>2</sup> Based on the latest TAC scenarios, 0 tonnes is the only option that offers a high likelihood of stock biomass growing over the next two years, as high as 78% of the LRP.

Although Atlantic mackerel is one of only a few critically depleted fisheries in Canada that has a rebuilding plan, the existing plan is weak, lacking targets and timelines for the population recover to healthy levels.<sup>3</sup> Fisheries and Oceans Canada has committed to developing rebuilding plans for depleted fish stocks, and appropriately included Atlantic mackerel in the list of prescribed stocks that rebuilding regulations will apply to under the revised Fisheries Act. We were encouraged in the stock assessment meeting last week to see new elements have been developed for inclusion in a revised plan, including timelines, probable causes of the stock’s decline and ecosystem considerations. The available evidence indicates the stock declined due to overfishing in 2005-2011 and rebuilding potential is currently limited by a truncated age structure, low recruitment, and high predation pressure. However, there is no indication that there has been significant increasing predation in recent years and clear indication that low fishing mortality significantly affects biomass growth. The rebuilding plan process is also an opportunity to allow for mitigation planning such as the use of alternative bait and collaborative surveying partnerships. The transboundary nature of this fishery, with both Canada and the United States fishing a portion of the stock, must be considered. The two countries must coordinate on strong and consistently applied management measures and monitoring — particularly for the bait and recreational fisheries.

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<sup>1</sup> Public Works and Government Services Canada. 2022. Regulations Amending the Fishery (General) Regulations: SOR/2022-73. Canada Gazette, Part 2, Volume 156, Number 8. Government of Canada, Public Works and Government Services Canada, Integrated Services Branch. <https://www.canadagazette.gc.ca/rp-pr/p2/2022/2022-04-13/html/sor-dors73-eng.html>

<sup>2</sup> DFO. 2022. Guidelines for Implementing the Fish Stocks Provisions in the Fisheries Act. Fisheries and Oceans Canada. <https://www.dfo-mpo.gc.ca/reports-rapports/regs/sff-cpd/guidelines-lignes-directrices-eng.html>

<sup>3</sup> DFO. 2020. Rebuilding Plan for Atlantic Mackerel — NAFO Subareas 3 and 4. Fisheries and Oceans Canada. <https://www.dfo-mpo.gc.ca/fisheries-peches/ifmp-gmp/mackerel-atl-maquereau/mac-atl-maq-2020-eng.html>

Given that this stock supports many dependent species in the ecosystem, as well as multiple commercial fisheries through its role as a forage and bait fish, these measures should be accompanied by the prioritization of this stock for implementation of the Fishery Monitoring Policy. It is imperative for the rebuilding of the stock to ensure all fisheries, including commercial, bait and recreational activities, interacting with Atlantic mackerel undergo a robust evaluation of their monitoring programs. In 2020, Fisheries and Oceans Canada established daily catch limits, minimum size requirements, and fishing season dates for recreational fisheries to address previously unregulated and unlimited fishing that was estimated between 2000-5000 tonnes annually<sup>4</sup>. Achieving the Fishery Monitoring Policy objectives for this stock would increase and improve the data available for assessments. This will ensure that information and data informing stock assessments are as accurate as possible moving forward, as well as ensuring all fisheries follow harvest level requirements.

In summary, following the science and policy guidance on harvest levels, along with implementing the revised rebuilding plan and fisheries monitoring, are interventions necessary to promote the long-term recovery of the critically depleted, yet crucially important, Atlantic mackerel population. We appreciate the opportunity to provide input and thank you for your time. We will continue to be engaged in the process and look forward to discussing our recommendations and any upcoming developments.

Sincerely,



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<sup>4</sup> Smith, A.D., Van Beveren, E., Girard, L., Boudreau, M., Brosset, P., Castonguay, M., and Plourde, S. 2020. Atlantic mackerel (*Scomber scombrus* L.) in NAFO Subareas 3 and 4 in 2018. DFO Can. Sci. Advis. Sec. Res. Doc. 2020/013. iv + 37 p.