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OCEANA CANADA'S RECOMMENDATIONS FOR NORTHERN COD



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30 March 2023

Dear Robyn,

As a recent observer at the 2J3KL Northern Cod Advisory Committee Meeting, we are writing today regarding upcoming harvest level decisions for this stock. Oceana Canada appreciates the opportunity to participate in the process and contribute our perspectives. Recognizing the challenges stemming from the absence of an updated stock assessment, we respectfully recommend the following measures to ensure sustainable Northern cod fisheries:

1. **Follow scientific advice and keep fishing removals to the lowest possible level by adopting a more precautionary maximum authorized harvest for the stewardship fishery of 4,300 metric tonnes;**
2. **Identify and account for all sources of fishing mortality, including from the recreational fishery;**
3. **Prioritize developing and implementing a rebuilding plan that is compliant with the rebuilding regulations under Canada's amended *Fisheries Act* by early 2024.**

We provide more detail on these recommendations below.

1. **Follow scientific advice and keep fishing removals to the lowest possible level by adopting a more precautionary maximum authorized harvest for the stewardship fishery of 4,300 metric tonnes:** To be responsible stewards of Canadian fisheries, quota decisions must be based on the best available science and prioritize the long-term health of the population. The decision last year to rollover the 12,999 tonnes quota was deeply flawed and inconsistent with DFO's Precautionary Approach Framework and science advice. The stock remains in the critical zone, where removals from all

sources must be kept to the lowest possible level until it has cleared this zone.^{1,2} Allowing for continued high commercial catches, combined with unknown total fishing mortality, conflicts with the department's own policy.

In the absence of an updated stock assessment and survey data, spawning stock biomass (SSB) is estimated based on three-year projections from the previous stock assessment² and recent science advice. The 2022 estimate is 53 per cent of the Limit Reference Point (LRP), and the 2023 estimate is 54 per cent with wide uncertainty.³ Projections beyond one year attribute a high level of uncertainty to future natural mortality, which has been identified as a major threat that limits the recovery of this population. Additional considerations contributing to stock productivity are changing conditions in the broader ecosystem, including for cod's key prey, capelin and shrimp. These ecosystem-based considerations necessitate a more precautionary approach.

Oceana Canada recommends that catches return to a more responsible level of 4,300 tonnes for the stewardship fishery. Harvest rates between 2013 and 2015 were between 4,000-5,000 tonnes annually and corresponded to conditions where a peak in abundance was observed in 2015 (880 million fish).⁴ After this peak, catch quotas increased more than twofold, fishing mortality doubled (from 0.01 in 2015 to 0.02 in 2017), and SSB declined (37 per cent of LRP in 2018).⁴ Catches ranging from 10,000-13,000 tonnes between 2016 to 2021 may be exerting too much fishing pressure to allow for sufficient recovery.⁵ According to the 2020 status update,⁶ cod stock growth may have stalled since 2016 based on the lack of increase in cod survey indices. Importantly, keeping fishing pressure low enables a faster rebuilding period for the long-term prosperity⁷ of coastal communities and a resilient population in the face of changing climate conditions.

2. **Identify and account for all sources of fishing mortality, including from the recreational fishery:** In consultation with participants of the recreational or 'food' fishery in the province, we recognize the importance of this fishery as the only opportunity for people to engage in the fishing heritage of Northern cod outside of the stewardship fishery. To preserve this important opportunity for residents of

¹ DFO. 2009. A fishery decision-making framework incorporating the precautionary approach. Available online (<https://www.dfo-mpo.gc.ca/reports-rapports/regs/sff-cpd/precaution-eng.htm>).

² DFO. 2019. Stock assessment of Northern cod (NAFO Divisions 2J3KL) in 2019. DFO Can. Sci. Advis. Sec. Sci. Advis. Rep. 2019/050. http://www.dfo-mpo.gc.ca/csas-sccs/Publications/SAR-AS/2019/2019_050-eng.html

³ This estimate was presented in the 2J3KLMNO Advisory Committee during the Science update but the projections from the last assessment state, "In 2022, under current catch levels, the SSB relative to Blim is projected to be 0.56 with wide confidence intervals of 0.26 to 1.19" (DFO 2019).

⁴ DFO. 2018. Stock assessment of Northern (2J3KL) cod in 2018. DFO Can. Sci. Advis. Sec. Sci. Advis. Rep. 2018/038. <https://waves-vagues.dfo-mpo.gc.ca/Library/40872142.pdf>

⁵ Schijns, R., Froese, R., Hutchings, J.A., and Pauly, D. (2021). Five centuries of cod catches in Eastern Canada. ICES Journal of Marine Science, 78(8), 2675-2683.

⁶ DFO. 2021. 2020 Stock Status Update for Northern Cod. DFO Can. Sci. Advis. Sec. Sci. Resp. 2021/004. <https://waves-vagues.dfo-mpo.gc.ca/Library/40966458.pdf>

⁷ For a discussion of potential long-term socio-economic benefits of rebuilding Northern cod see: Oceana Canada. (2019). Oceans of Opportunity: The Economic Case for Rebuilding Northern Cod (https://oceana.ca/sites/default/files/the_economic_case_for_rebuilding_northern_cod_report.pdf).

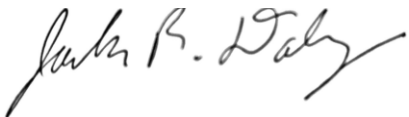
Newfoundland and Labrador, we ask the department in consultation with stakeholders and rightsholders, to co-develop a recreational fishery monitoring program for this fishery so that total fishing mortality can be estimated. We also recommend that Northern cod be prioritized for implementation of the Fishery Monitoring Policy.

3. **Prioritize developing and implementing a rebuilding plan that is compliant with the rebuilding regulations under Canada's amended *Fisheries Act* by early 2024:** According to the rebuilding regulations,⁸ the Northern cod rebuilding plan must be strengthened to comply with the amended *Fisheries Act*. The current rebuilding plan,⁹ published in 2021, has faced criticism^{10,11} and lacks elements that are now required by law. The department must develop a strengthened rebuilding plan which includes a socio-economic analysis and applies ecosystem-based approaches. Comprehensive rebuilding plans offer an opportunity to identify socio-economic, cultural, ecological, monitoring and compliance objectives with stakeholders to achieve a shared vision for success.

It is imperative that the department follow the guidance¹² outlining best management practices which have been demonstrated to successfully rebuild fish populations. These measures include defining targets, timelines and probabilities for long-term objectives.

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.

Yours Sincerely,



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⁸ Canada Gazette, Part II, Volume 156, Number 8. <https://www.canadagazette.gc.ca/rp-pr/p2/2022/2022-04-13/html/sor-dors73-eng.html>

⁹ DFO. 2021. Rebuilding Plan for Atlantic Cod – NAFO Divisions 2J3KL. Fisheries and Oceans Canada. <https://www.dfo-mpo.gc.ca/fisheries-peches/ifmp-gmp/cod-morue/2020/cod-atl-morue-2020-eng.html>

¹⁰ Levesque B, Archibald DA, Rangeley R. 2021. The Quality of Recent Rebuilding Plans in Canada. Oceana Canada. <https://oceana.ca/wp-content/uploads/sites/24/The-Quality-of-Recent-Rebuilding-Plans-in-Canada-2021-FINAL.pdf>

¹¹ Hutchings JA, Rose GA, Shelton PA. 2021. The flawed new plan to rebuild Canada's iconic Northern cod. Policy Options. <https://policyoptions.irpp.org/magazines/march-2021/the-flawed-new-plan-to-rebuild-canadas-iconic-northern-cod/>

¹² Guidance for the development of rebuilding plans under the Precautionary Approach Framework: Growing stocks out of the critical zone. <https://www.dfo-mpo.gc.ca/reports-rapports/regs/sff-cpd/precautionary-precaution-eng.htm>