



Oceana Canada Recommendations for the 2024 Atlantic Mackerel Management Plan

RESPONSE TO ATLANTIC MACKEREL ADVISORY COMMITTEE MEETING



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Todd Williams
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RE: Oceana Canada recommendations for the 2024 Atlantic mackerel management plan

Dear Todd Williams,

As an observer to the recent Atlantic Mackerel Advisory Committee meeting, I am writing today regarding upcoming management decisions pertaining to the Atlantic mackerel stock (NAFO area 3+4). Over the past two years, Fisheries and Oceans Canada (DFO) took significant and necessary steps to restore the critically depleted Atlantic mackerel stock. After a decade of mismanagement and overfishing, DFO closed both the commercial and bait fisheries, with some minor exemptions to address socioeconomic concerns. This year, with no new science assessment and the impending implementation of a rebuilding plan that is *Fisheries Act* compliant, we urge the department to take all necessary measures to continue the rebuilding of this stock, including by maintaining the closure for the 2024 season. Oceana Canada appreciates the opportunity to participate in this process and respectively recommends the following:

- 1. Follow the letter and the intent of the Fishery (General) Regulations by continuing the closure** of the commercial and bait fishery to enable the highest likelihood of accelerated rebuilding and minimize long-term socioeconomic costs.
- 2. Implement and follow the revised rebuilding plan** in conjunction with the 2024 management measures to achieve the primary objective, grow the stock above the Limit Reference Point (LRP) with a high likelihood ($\geq 75\%$ probability) and maintain the commercial and bait closure until the stock is above the LRP and trending positive.
- 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 removal reference.

The Atlantic mackerel stock has remained in the Critical Zone since 2011 and has so far failed to recover due to overfishing and mismanagement which has resulted in a truncated age structure and low recruitment, inhibiting rebuilding. Commercial quotas exceeded science advice in several instances over the past decade with egregious examples including quotas set 12.5 and 10 times higher than what was advised in 2014 and 2015 respectively. This, in part, resulted in Atlantic mackerel reaching its lowest spawning stock biomass (SSB) in 2021, and in 2022 the SSB was estimated at just 42 per cent of the Limit Reference Point (LRP).

Although this stock has suffered from past mismanagement resulting in ecosystem harm and socioeconomic costs, a rebuilt population is within reach. The 2022 assessment stated that the stock can rebuild above its LRP in 6 to 7 years under a Total Allowable Catch (TAC) of 0 tonnes. Additionally, without fishing pressure the SSB will grow over the next two years at the highest probability of 78.5 per cent. In stark contrast, this confidence drops to just 32.5 per cent when the TAC is raised to 8,000 tonnes. The evidence is clear, the best option for ensuring the stock can rebuild over the short-term is a continued closure. Further, as there was no new scientific advice this year, there is no rationale for the Minister to change the management measure set out in 2023. The science advice is the same this year and the fishing industry has had two years to adjust to the closure. We look forward to an updated science assessment in 2024 to revisit management measures and discuss evidence of their effectiveness, as well as the status of the stock and recent trends.

The publication of the Atlantic mackerel rebuilding plan must guide the annual management of this stock until it is confidently out of the critical zone and trending upward. Due to the department's due diligence and commitment to fulfilling the Fishery (General) Regulations under the *Fisheries Act*, a comprehensive rebuilding plan will be published this spring. Oceana Canada has submitted comments on how the rebuilding plan can be further improved before publication by including measurable stock-specific objectives and timelines, Indigenous Knowledge Systems objectives, and climate change mitigation considerations.

Key to the success of this plan is its unincumbered implementation. Not only are the integrity of the rebuilding plans key to fulfilling the obligations under the *Fisheries Act*, but they are also essential tools to help Canada achieve international commitments including the 2030 targets under the Convention on Biological Diversity (CBD), finalized in 2022 in Montreal.¹ Forage fish, like Atlantic mackerel, play a key role in the ecosystem through the transfer of energy from lower trophic levels to higher-order predators. For example, the decline in breeding success of northern gannets is associated with a decrease in mackerel SSB.² The mackerel rebuilding plan must be fully implemented to ensure the long-term rebuilding of this stock for the benefit of the marine ecosystem as well as the commercial and bait fisheries who rely on this stock across Eastern Canada.

¹ Environment and Climate Change Canada. 2023. Toward a 2030 Biodiversity Strategy for Canada. Target 5 Indicator 5.1 Proportion of fish stocks within biologically sustainable levels. [Toward a 2030 Biodiversity Strategy for Canada: Halting and reversing nature loss - Canada.ca](#)

² Fisheries and Oceans Canada. 2023. Assessment of The Northern Contingent of Atlantic Mackerel (*Scomber scombrus*) In 2022. [Assessment of the northern contingent of Atlantic mackerel \(*Scomber scombrus*\) in 2022 \(dfo-mpo.gc.ca\)](#)

Although some representatives of the fishing industry have presented multiple points of evidence to call into question the department's scientific understanding of the stock and have called for a re-opening of the fishery in its collapsed state, we commend the department for addressing every single industry concern by expanding survey areas and committing to dialogue with the United States (U.S.) to advance consistent management of the stock across the two jurisdictions (Box 1). All feedback from stakeholders should be shared with the Minister but must be contextualized to not equivocate science-based analyses with subjective observations.

Finally, in line with our recommendation over the past number of years, we are pleased to see that the Atlantic mackerel stock is a priority for the implementation of the Fishery Monitoring Policy (FMP) over the next five years and objectives are defined in the draft rebuilding plan. We encourage the department to continue exploring the feasibility of 100 per cent dockside monitoring for commercial and bait fisheries, and advance steps for the collection of recreational catch and effort data. We support efforts to modernize fisheries monitoring, including a transition to electronic reporting and monitoring technologies that record all catches.

Box 1. Addressing Industry concerns

"DFO is not capturing the spatial extent of the stock."

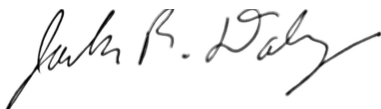
The department has addressed this concern multiple times and continues to explore options for expanded surveys, as they did in the summer of 2023 to identify mackerel spawning on the southwest coast of Newfoundland. Further, the 2022 assessment stated that "there was consensus that observations of high mackerel abundance in one region does not contradict the presented evidence of low stock state, as mackerel are highly migratory schooling fish that even at low stock abundance can be perceived as plentiful" (DFO 2023).

"If the U.S. fleet exploits this stock, then why doesn't Canada?"

As stated in the draft rebuilding plan, Canada continues to work with the U.S. to better ensure the rebuilding of the Northwest Atlantic mackerel stock. Further, the U.S. has progressively reduced their mackerel quota from 17,321 t in 2022 to just over 3,000 t last year due to conservation concerns.

This is an exciting time for the department because after years of hard work to improve science, monitoring and policy, this stock is uniquely poised to benefit from a robust rebuilding plan. Although many other critically assessed stocks in Canada suffer from a lack of a rebuilding timelines and clear management measures, Atlantic mackerel can be rebuilt within the decade if the department follows both the letter and the intent of the *Fisheries Act*. As we are seeing with the recent announcement to open the Unit 1 Redfish fishery, sustained restraint can lead to opportunities for widespread benefits for the economy and ecosystem. We look forward to supporting the department as it continues to steward this stock for long-term growth, rather than short-sighted economic gain.

Sincerely,



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