



Oceana Canada recommendations for the 2024 Gulf (4RST) capelin management plan



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Erin Dunne

Chair, 4RST Capelin Advisory Committee

Senior Resource Manager, Pelagic Fisheries/Fisheries Management

Fisheries and Oceans Canada/Government of Canada

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RE: Oceana Canada recommendations for the 2024 Gulf (4RST) capelin management plan

Dear Erin Dunne,

As an observer to the Gulf of St. Lawrence (4RST) Capelin Advisory Committee that took place on March 8, 2024, I am writing today regarding the upcoming management decisions for this stock. Oceana Canada appreciates the opportunity to contribute to this process and speak to the science guidance and policy requirements for managing forage fish like 4RST capelin. Forage fish, which also include species such as herring and mackerel, are small, fast-growing schooling fish that play an important role in transferring energy from the plankton they eat to the larger species that prey on them. Due to their ecological importance, forage fish like capelin cannot be managed in the same manner as single-species stocks.

To facilitate a better outcome for this stock, fisheries management must source sustainable management practices for forage species from within the existing Precautionary Approach Framework (PA). 4RST capelin currently lack all reference points necessary to ascertain stock status under the PA, and continued management under these conditions poses risks of undetected overfishing. As such, Oceana Canada recommends the following measures:

- 1. Implement a Total Allowable Catch (TAC) of no more than 9,295 tonnes.** This moderate reduction of 9 per cent reflects the wide uncertainty presented in this year's stock assessment and returns the TAC to 2018-2021 levels.
- 2. Adopt an LRP** and begin the development of an Upper Stock Reference (USR) and Harvest Control Rules (HCRs) to manage 4RST capelin under the PA. This approach must account for the unique role forage fish play in the ecosystem.

During the 2024 stock assessment meeting for 4RST capelin, the state of the stock was presented as a composite of several indices describing the presence of capelin in the diets of predators, trends in recruitment, a mature biomass index and the timing of ice retreat in the Gulf of St. Lawrence. Oceana Canada is concerned about the quality of available science determining these factors and informing management. For example, the key

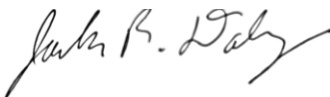
indicators describing the stock, mature biomass and recruitment indices, are derived from bottom trawl surveys characterized by high levels of uncertainty due to concerns regarding catchability, timing, and poor sampling. Further, the recruitment index presented at this year's assessment showed significant variability with uncertainty on whether this is due to biological changes or observation error. Although the mature biomass index has remained relatively stable at low values since the highest observation from 2010-2013, the lack of a robust science assessment means the potential for local depletion cannot be ruled out as this uncertainty, among others, has not been addressed.

Capelin are essential components of the marine food web of the Gulf of St. Lawrence and particularly important in the diet of depleted groundfish stocks such as Gulf cod and turbot. Despite some positive signs in how this stock is managed, such as fishing mortality estimates considered to be within sustainable levels for small pelagic fish in the past two years, we are concerned that this stock is being managed for stagnation, rather than growth. For these reasons, Oceana Canada feels that a moderate decrease in TAC of 9 per cent to no more than 9,292 tonnes is justified while reference points are developed. Further, the Integrated Fisheries Management Plan (IFMP) states that current TACs are based on commercial fishery market needs. Given that the percentage of TAC taken in 2022 and 2023 were 49 per cent and 11 per cent respectively, this year's TAC should be lowered to reflect this.

Oceana Canada also urges the immediate adoption of an LRP for 4RST capelin to clearly inform harvest level decisions. We ask the department to refrain from further TAC increases until an LRP is in place which should be completed within the next 12 months given the multiple viable options identified by DFO Science. Although this is a data-limited stock, DFO's own guidance provides several recommendations in this instance including by averaging candidate LRPs and using traffic-light approaches.¹ We also ask the department to expand research priorities for this stock by examining the impact of climate change and warming waters in the Gulf of St. Lawrence on stock productivity and recruitment.

In conclusion, Oceana Canada requests formal membership to the 4RST Capelin Advisory Committee. We have been involved in the assessments and participated as observers to the committee for this stock since 2022. Given our participation in the assessments for other forage fish in the Gulf of St. Lawrence and for the 2J3KL capelin stock, we can inform discussion and be a productive member of the committee. Please let me know if you would like me to provide any further rationale or information on this request.

Sincerely,



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¹ DFO. 2023. Science Advice on Guidance for Limit Reference Points under the Fish Stocks Provisions. DFO Can. Sci. Advis. Sec. Sci. Advis. Rep. 2023/009.