



Oceana Canada Recommendations for the 2024 Unit 1 + 2 Redfish Management Plan



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RE: Oceana Canada Recommendations for Unit 1+2 Redfish Management in 2024-2025

Dear Todd Williams,

This letter is regarding upcoming management decisions for the redfish stock in Unit 1+2, composed as a recent observer at the Redfish Advisory Committee (RAC) meeting. The stock has been under moratorium in Unit 1 for thirty years and has made a remarkable comeback since 2011. On January 26, Fisheries and Oceans Canada (DFO) announced a minimum quota of 25,000 tonnes for Unit 1 redfish for the 2024 fishing season, with the final quota to be decided in the coming weeks following the RAC. With the rebound of redfish, DFO has an opportunity to demonstrate how a fishery can be re-opened successfully. Following modern policies and laying out a clear, measurable plan is key to this success. Only then can redfish provide an economic boost to coastal communities for years to come. Oceana Canada appreciates the opportunity to participate in this process and respectively recommends the following measures:

- 1. Implement and follow a management plan including measures to sustain growth and mitigate bycatch.**

An increasing redfish fishery has potentially large impacts on benthic habitat and bycatch¹, including commercially important species (e.g., Greenland halibut), depleted species (e.g., Atlantic cod, white hake), and undersized redfish. Following the law and policy, a robust management plan is necessary to prevent the recurrence of overfishing that previously led to the collapse of the redfish stock and other non-target species. Bycatch mitigation will allow for better fishing opportunities, prolong the duration of the fishery and avoid catching other commercially valuable species like halibut. A good bycatch mitigation plan will also contribute to rebuilding depleted stocks and protecting younger redfish. The Gulf of St. Lawrence is home to several critically depleted groundfish stocks, including five stocks with rebuilding plans that include measures to reduce bycatch by setting strict limits on interacting fisheries. Members of the fishing industry recognize these issues and have been working throughout the duration of the experimental fishery to find ways to identify the two redfish species and reduce bycatch. These efforts are encouraging, and Oceana Canada recommends applying these lessons in practice while pursuing further research.

Additionally, we recommend implementing a comprehensive suite of management measures to ensure the fishery effectively avoids bycatch and minimizes its additional impact on the ecosystem, which includes the following:

- i. **Maintain current seasonal closures and restricted areas and adopt a 300m depth restriction.** These measures aim to target Deepwater redfish over 22cm and minimize bycatch, particularly of cod and white hake, while maintaining a long fishing season.
- ii. **Prohibit bottom and midwater trawling within marine refuges,** which is crucial to mitigate risk of damage caused by unselective or bottom-contacting gear on sensitive species and habitats. Successful trials of excluder grid/separator panels during the experimental period suggest their ability to further mitigate bycatch and warrants implementation.
- iii. **Enforce bycatch limits per trip of either 1-2 per cent or 300kg** for all critical stocks with proposed rebuilding plans, to maximize fishing opportunities for all fleets and prevent triggering closures.
- iv. **Adopt a move-on protocol** akin to the NAFO model. This would ensure immediate action if the total bycatch of certain groundfish species exceeds specified thresholds.

Fisheries perform better when there is accounting of total fishing mortality and use of more selective gears². For example, mitigating bycatch of yelloweye rockfish by

¹ Rolland, N., McDermid, J.L., Swain, D.P., Senay, C. 2022. Impact of an expanding Redfish (*Sebastes* spp.) fishery on southern Gulf of St. Lawrence White Hake (*Urophycis tenuis*). DFO Can. Sci. Advis. Sec. Res. Doc. 2022/005. viii + 69 p.

² Schiller, L., Britten, G. L., Auld, G., & Worm, B. 2024. Learning from positive deviants in fisheries. *Fish and Fisheries*.

changing their spatial footprint to avoid areas with traditionally high yelloweye encounter rates in the Pacific halibut fishery led to healthier stocks and lower conflict among users. Similarly, efforts to keep Atlantic cod and witch flounder (3NO stocks) bycatch to 1 per cent of total landings were also met by the MSC-certified fishery for 3LNO yellowtail flounder through the implementation of a real-time bycatch monitoring system and 'move on' procedure. For the redfish fishery to be a success story, it will take strong management measures such as these and collaboration between DFO and the fishing industry.

2. Follow the letter and the intent of the Fishery (General) Regulations by maintaining a Total Allowable Catch (TAC) of 25,000 tonnes for Unit 1 and 8,500 tonnes for Unit 2 redfish stocks.

Reopening the redfish fishery demands a balanced and strategic approach that prioritizes conservation while also fostering economic growth. According to the latest science update, high rates of fishing mortality may cause biomass to decrease to less than 10 per cent of the initial biomass in 6 years, compared to 8 years with lower rates, and 9 years without fishing.³ Setting an initial commercial quota of 25,000 tonnes and gradually increasing quotas towards 60,000 tons in subsequent years, contingent upon favorable ecological conditions and market dynamics, upholds the management objective of avoiding large inter-annual fluctuations in TACs while maintaining healthy biomass levels. Maintaining the TAC for Unit 2 at 8,500 tonnes also supports these goals, given the current scientific knowledge⁴.

This measured approach not only mitigates the risk of overexploitation and minimizes bycatch but also safeguards against the detrimental impacts of a boom-and-bust fishery, especially since there's already a population decline on the horizon, even without fishing. It is important to recognize that while Deepwater redfish (*Sebastes mentella*) are at healthy levels, the status of Acadian redfish (*Sebastes fasciatus*) has large uncertainty from 1 to 361kt, with a median spawning stock biomass slightly above the proposed Upper Stock Reference point at 181 kt above 168 kt.

The implementation of a two-year transitional phase serves as a catalyst for economic revitalization in fishing communities. This period of transition not only stimulates job creation and economic growth but also fosters opportunities for reconciliation within the fisheries sector. Additionally, it provides a crucial window for market development and adaptation to the unique challenges posed by this fishery, such as the financial uncertainties associated with smaller fish sizes and the need for innovative product strategies. By embracing a comprehensive strategy that

³ DFO. 2024. Unit 1 Redfish (*Sebastes mentella* and *S. fasciatus*) Update in 2023. DFO Can. Sci. Advis. Sec. Sci. Resp. 2024/008.

⁴ DFO. 2022. Redfish (*Sebastes mentella* and *S. fasciatus*) Stocks Assessment in Units 1 and 2 in 2021. DFO Can. Sci. Advis. Sec. Sci. Advis. Rep. 2022/039.

harmonizes conservation objectives with socio-economic imperatives, we can navigate the complexities of fisheries management with foresight and responsibility, ensuring the sustainability of marine ecosystems for generations to come.

3. Prioritize implementing the Fishery Monitoring Policy (FMP), including a robust monitoring program.

Prioritizing fisheries monitoring is paramount to address existing data gaps in the redfish fishery while recognizing the critical importance of this stock to both commercial interests and ecosystem health. The recent findings of the Office of the Auditor General⁵ expose the failure to implement the FMP and underscore the urgency of enhancing monitoring efforts. Reopening the fishery presents an opportune time to set conservation and compliance monitoring objectives, and requirements that will achieve these objectives.

As presented at the RAC, a suite of complementary tools can be used to meet coverage targets, such as 100 per cent dockside and logbook reporting, 100 per cent at-sea observer (ASO) coverage in NAFO Area 4T and winter, and 100 per cent coverage of vessel monitoring systems (VMS) in NAFO Area 4T. Implementing rigorous ASO and dockside monitoring, including the rollout of electronic logbooks and increased VMS coverage, will provide dependable, timely and accessible fishery data for informed decision-making and compliance enforcement. Enhanced monitoring will also facilitate collaboration between DFO and harvesters to devise innovative solutions and improve fishery viability, ultimately leading to increased market access and eco-certification opportunities.

This is an exciting time for the department because after years of hard work to improve science and policy, redfish's health has benefitted. We are urging DFO to exercise a cautious and measured approach for upcoming management decisions, to ensure a healthy redfish population add value to both the economy and the ecosystem. We look forward to continuing our engagement in this process and supporting DFO in their efforts to responsibly steward this stock for long-term health.

Sincerely,



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⁵ Office of the Auditor General of Canada. 2023. Reports of the Commissioner of the Environment and Sustainable Development to the Parliament of Canada. Monitoring Marine Fisheries Catch—Fisheries and Report 9. Oceans Canada.