



RE: 2025 Management Recommendations for Southern Gulf of St. Lawrence Herring Spring Commercial Fishery



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Carole LeBlanc
Director, Fisheries Resource Management
Gulf Region
Fisheries and Oceans Canada
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RE: 2025 Management Recommendations for Southern Gulf of St. Lawrence Herring Spring Commercial Fishery

Dear Carole LeBlanc and members of the Advisory Committee,

Background

Oceana Canada is an independent charity established to restore Canada's oceans to be as rich, healthy, and abundant as they once were and is proud to be affiliated with the international family of Oceana organizations. We respectfully work with civil society, academics, fishers, Indigenous Peoples and the government. As an engaged member of fishery advisory committees across Fisheries and Oceans Canada (DFO) Regions, we advocate for science-based fisheries management that rebuilds Canada's fisheries and allows fishers and coastal communities to reap greater economic and nutritional benefits both now and in the future.

Recommendations

Oceana Canada appreciates DFO for the opportunity to provide feedback as a member of the Gulf Small Pelagic Advisory Committee (GSPAC). In response to the December 2nd, 2024, letter to GSPAC members we provide the following recommendations regarding southern Gulf herring spring management measures.

Publish or share an embargoed copy of the approved rebuilding plan

Oceana Canada has been supportive of the department's rebuilding plan process for this stock, and we believe that by working together, stakeholders have strengthened the rebuilding plan from earlier iterations. We appreciate the department's efforts to address some of our key recommendations by including both short and long-term projections, an estimated generation time to inform the rebuilding timeline, and clearly stating the limitations of these estimates with a plan to reassess this information in future review periods. We also support the additional measures to advance current scientific knowledge on the changing environment and ecosystem, with specific mention to incorporate climate change-related processes in the provision of advice.

Unfortunately, because stakeholders do not have access to the final approved plan, we do not know whether several of our recommendations remain unaddressed including on our call for short and long-term stock conservation objectives and our request to include additional objectives related to

social, cultural and economic benefits of rebuilding which were key components of rebuilding progress as seen in Tables 23-27 in the draft Haida Gwaii Pacific herring rebuilding plan.¹ In order to increase transparency in the work of the GSPAC we ask that the department share an embargoed copy of the approved rebuilding plan. Sharing the plan better informs members of the legislative requirements regarding the management of critically depleted fish stocks and can help all stakeholders make informed recommendations for the 2025 management season.

Follow the Rebuilding Plan by maintaining full closure of fisheries intercepting the spring spawner component

The spring spawning component of southern Gulf herring continues to suffer from poor recruitment driven by environmental conditions, reduced weight-at-age, high natural mortality conditions and unaccounted fishing mortality due to bait removals. Given the poor state of the stock and negative outlook, we recommend that the department **follow all rebuilding plan management measures** including maintaining a full closure of the commercial and bait spring fisheries to retain the potential for stock growth.² Given the episodic fluctuations of forage fish populations and ability for strong year classes to dramatically change the potential yield, continuing the closure to ensure that removals are kept to the absolute minimum provides the best chance for recovering this population.

The department must **follow the precautionary approach policy** which states that management actions must promote stock growth and removals from all sources must be kept to the lowest possible level for stocks in the critical zone. If directed fishing or bycatch occurs on a stock at or below its limit reference point (LRP), it must be demonstrated that the catch level has a high likelihood ($\geq 75\%$ probability) of enabling the stock to grow to the rebuilding target within the plan's timeline and a very low likelihood ($< 5\%$ probability) of causing preventable decline, as outlined in the rebuilding plan guidelines.³ Given that, even in the absence of fishing, the short-term (SSB projections through 2027) and long-term (SSB projections through 2069) outlooks for rebuilding the Atlantic Herring spring spawner component are unlikely, the commercial fishery must remain closed.

The department has the **legal obligation** to implement the rebuilding plan and grow the depleted stock to healthier levels.⁴ As stipulated in section 6.2 (1) of the Fish Stock Provisions, *“If a major fish stock has declined to or below its limit reference point, the Minister shall develop a plan to rebuild the stock above that point in the affected area, taking into account the biology of the fish and the environmental conditions affecting the stock, and implement it within the period provided for in the plan.”* According to the implementation guidelines, all management measures must *“avoid the prescribed major fish stock declining to or below its LRP (Critical Zone) with a high to very high likelihood ($\geq 75\%$)”*.

Framing of Oceana Canada recommendations to the committee

We thank the department for sharing all GSPAC member recommendations for annual management measures. When reviewing stakeholder recommendations, Oceana Canada's recommendations were boiled down to “maintain full closure of the spring fishery” while other stakeholders were afforded more detailed breakdowns of their positions. Our position last year did include a recommendation for a continued closure of the spring fishery, but in the context of abiding by the Fish Stock Provisions of the *Fisheries Act* and the draft stakeholder-informed rebuilding plan. Further, like other stakeholders, we supported actions for ongoing and future research including on

¹ Council of Haida Nation (CHN), Department of Fisheries and Oceans (DFO), Parks Canada Agency (PCA). Haida Gwaii 'iinaang | iinang Pacific Herring: An Ecosystem Overview and Ecosystem-based Rebuilding Plan. 2022.

² See Table 7 in draft rebuilding plan.

³ Guidelines for writing rebuilding plans per the Fish Stock Provisions and A Fishery Decision-making Framework Incorporating the Precautionary Approach

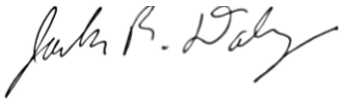
⁴ Guidelines for Implementing the Fish Stocks Provisions in the *Fisheries Act*.

the role of large fish for reproductive output; pre-recruit growth and diet; incorporation of fish harvester knowledge; microbial genetics to help spatially disaggregate the spring spawners; and increased work to implement an ecosystem approach.

As we support rebuilding fisheries for ecologically rich ecosystems and economically robust commercial fisheries, we request that the department provide more context to other stakeholders on our position in the future. Framing our recommendations as simply “maintain full closure” does not reflect our work with the committee which has focused on strengthening the rebuilding plan so that the stock can be exploited in the future, complying with Canadian law and policy.

We appreciate the opportunity to provide input, and we look forward seeing to the published rebuilding plan to guide management decisions until this stock is safely out of the critical zone.

Sincerely,

A handwritten signature in black ink that reads "Jack B. Daly". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Jack Daly, M.A.
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