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March 10, 2025



# Oceana Canada recommendations to the 4RST Capelin Advisory Committee 2025



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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 to the 4RST Capelin Advisory Committee 2025**

Dear Erin Dunne 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. This letter contains our management recommendations, following our participation in the advisory meeting.

**Recommendations**

As a member of the Gulf of St. Lawrence (4RST) Capelin Advisory Committee that took place on February 28, 2025, I am writing today regarding the draft Terms of Reference and 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 must be managed "in ways which are compatible with conservation of the full ecosystem, and that their sustainability is evaluated in that larger context".<sup>1</sup>

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<sup>1</sup> Fisheries and Oceans Canada. 2009. Policy on New Fisheries for Forage Species. [Policy on New Fisheries for Forage Species](#)

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 last year's stock assessment and returns the TAC to 2018-2021 levels.
2. **Adopt a Limit Reference Point (LRP)** and begin the development of an Upper Stock Reference (USR) and Harvest Control Rules (HCRs) to manage 4RST capelin in line with the PA. This approach must account for the unique role forage fish play in the ecosystem.
3. **Add the 4RST Capelin stock to Schedule IX of the Fishery (General) Regulations.** Including this stock in Schedule IX allows for an updated, science-based framework to guide its management towards sustainable abundance.
4. **Update the draft Terms of Reference** membership section to include "Environmental Non-Government Organizations" and "any other relevant provincial governments".

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 the 2024 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 in the Gulf of St. Lawrence and are particularly important in the diet of depleted groundfish stocks such as Gulf cod and winter flounder. For example, in the recently published rebuilding plan for Gulf cod, food availability was listed as one of the primary factors affecting the distribution and habitat selection of ecologically important older cod fish.<sup>2</sup>

Despite some positive signs in how the 4RST capelin stock is managed, such as fishing mortality estimates considered to be within sustainable levels for small pelagic fish in the past few 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

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<sup>2</sup> Fisheries and Oceans Canada. 2025. Rebuilding plan: Atlantic cod (*Gadus morhua*) NAFO Divisions 4T and 4Vn. [Rebuilding plan: Atlantic cod \(Gadus morhua\) NAFO Divisions 4T and 4Vn](#)

commercial fishery market needs. Given that the percentage of TAC taken in 2023 and 2024 were 11 per cent and 23 per cent respectively, this year's TAC should be lowered to reflect this reality.

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.<sup>3</sup> 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.

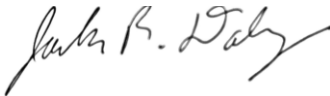
### Regulatory Guidance

As stipulated in section 6.1(1) of the Fish Stock Provisions, the Minister is mandated to implement measures that maintain major fish stocks at levels that promote their sustainability, accounting for biological factors and environmental conditions.

### Conclusion

Thank you for considering our recommendations and we look forward to continuing our work with the advisory committee to ensure an abundant and economically viable Gulf of St. Lawrence capelin fishery.

Sincerely,



**Jack Daly, M.A.**  
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<sup>3</sup> 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.