



Oceana Canada Recommendations to the Atlantic Mackerel Advisory Committee 2025



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Todd Williams
Chair, Atlantic Mackerel Advisory Committee
Senior Director, Resource Management
Fisheries and Oceans Canada
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RE: Oceana Canada recommendations to the Atlantic Mackerel Advisory Committee 2025

Dear Todd Williams 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 Atlantic Mackerel Advisory Committee that took place March 12-13th, 2025, I am writing today regarding the upcoming management decision 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 Atlantic mackerel. Forage fish, which also include species such as herring and capelin, 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 mackerel must be managed "in ways which are compatible with conservation of the full ecosystem, and that their sustainability is evaluated in that larger context".¹ Our recommendations are as follows:

Follow the Atlantic mackerel rebuilding plan by promoting a positive stock growth trajectory over a 2-year period with a minimum 75% probability. The only Total Allowable Catch (TAC)

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

option that support the primary rebuilding plan objective is a TAC of 500 t or less. In addition, we recommend the following measures:

1. *Multi-year decision*: Implement a two-year decision for a 500 t bait fishery annually. A multi-year decision is in line with the projections presented in the stock advice and allows DFO Science to address concerns raised by harvesters. This approach is in line with the rebuilding target to grow the stock so that it is above the LRP with a high likelihood while still providing fishing opportunities (rebuilding plan objective 6). With the drastic reduction in fishing by the U.S. (related to rebuilding plan objective 5), this moderate TAC will enable the stock to grow out of the critical zone by the early 2030s.
2. *Length frequency collection*: In line with the rebuilding plan objective 4 (enhance scientific knowledge, and ITK), the department should make it mandatory for harvesters to collect length frequencies from their catches to inform the age structure of the stock for future stock assessments. This recommendation stems from the rationale that the Minister provided in 2024 as to why a bait fishery was necessary.²
3. *Gear limitations*: Institute gear limitations to only allow for handline and mackerel trap gear. We recommend excluding gill nets due to bycatch concerns and excluding purse seines (and other seines) due to concerns regarding pulse fishing. Given the small quota, purse seines and other seine gears can exacerbate the likelihood of exceeding the TAC.
4. *Minimum size*: In line with the rebuilding plan objective 3 (reduce post-discard mortality), keep the minimum size requirement in the hook and line bait fishery to ensure that small fish are allowed a sufficient opportunity for escapement.

Advance rebuilding plan objective 2 (improve monitoring) through the continued implementation of the Fishery Monitoring Policy. The 2024 Atlantic mackerel bait fishery proved a monitoring success even with the immense logistical challenge associated with a quota split across five provinces. We commend the department for the in-season monitoring updates last year and request that the same transparency is instituted in this year's bait fishery to all advisory committee members. In addition, we recommend the following monitoring measures:

1. *Recreational survey*: Undertake a new recreational fishery survey to update the estimated fishing mortality used in the stock assessment.
2. *Recreational authorized gear*: Modify the authorized gear for the recreational fishery by allowing a maximum of one (1) line with a maximum three (3) hooks per line.
3. *E-monitoring timeline*: Set a timeline for when the use of e-monitoring tools will become mandatory across DFO Regions for the mackerel bait fishery.

Enforce the Code of Conduct and remind all participants that attending advisory committee meetings comes with responsibilities.

The Code of Conduct for the Atlantic mackerel advisory committee was not enforced at the meeting on Thursday March 13th, 2025. Rather, participants were allowed to engage in a roundtable discussion of whether active members of the advisory committee should even be present. The discussion included false accusations that non-governmental organizations (NGOs) were taking up too much time speaking, that NGOs represent a threat of foreign interference, and that the very presence of NGOs is the reason that other members no longer attend the meetings. This behavior violated the Code of Conduct of the Terms of Reference which states that advisory committee members shall, among other things: *respect each other's values and*

² Fisheries and Oceans Canada. 2024-05-16. 2024 Atlantic Mackerel bait fishery. [2024 Atlantic Mackerel bait fishery](#)

*interests; avoid accusatory or critical language, rude behaviour, and stereotyping; seek a better understanding of other perspectives with an open mind; and recognize the legitimacy of all interests.*³

The continued bullying and intimidation faced by NGOs across DFO Regions is unacceptable. This behavior inhibits the ability of these advisory bodies to fulfill their purpose and represents yet another challenge in the rebuilding of critically depleted and economically important fisheries. Enforcing the department's own Code of Conduct is essential at advisory committee meetings and if the Chair is unable to do so then the department must dedicate staff and resources to ensure the code is enforced throughout the duration of the meeting.

Regulatory Guidance

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 is mandated to 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.

The Atlantic mackerel stock which is listed under the Fish Stock Provisions continues to be well below the LRP with a very high probability of 95 per cent. The Minister must follow the Fish Stock Provisions of the *Fisheries Act* and the rebuilding plan to ensure that the 2025 management decision promotes a positive stock growth trajectory over a 2-year period with a minimum 75 per cent probability. The only TAC options that fall within this probability are TACs set at or below 500 t. TACs set at or below 500 t are the only viable options that should be presented for the Minister's consideration.

Policy Guidance

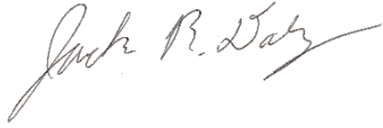
As multiple participants in the advisory committee recommended management measures that are not in line with the rebuilding plan, we remind the department that for established forage fish commercial fisheries, any change to exploitation rates, gears, seasons, or other attributes of fisheries in ways that might affect conservation of forage fish must be evaluated against the pre-requisites in the Policy on New Fisheries for Forage Species. These pre-requisites include four biological pre-requisites and six management pre-requisites that must be fulfilled to ensure that there is a minimization of the risk of changes to species abundance or relationships which are difficult or impossible to reverse.

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 Atlantic mackerel fishery.

Sincerely,

³ Fisheries and Oceans Canada. November 2024. Terms of Reference Atlantic Mackerel Advisory Committee.



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