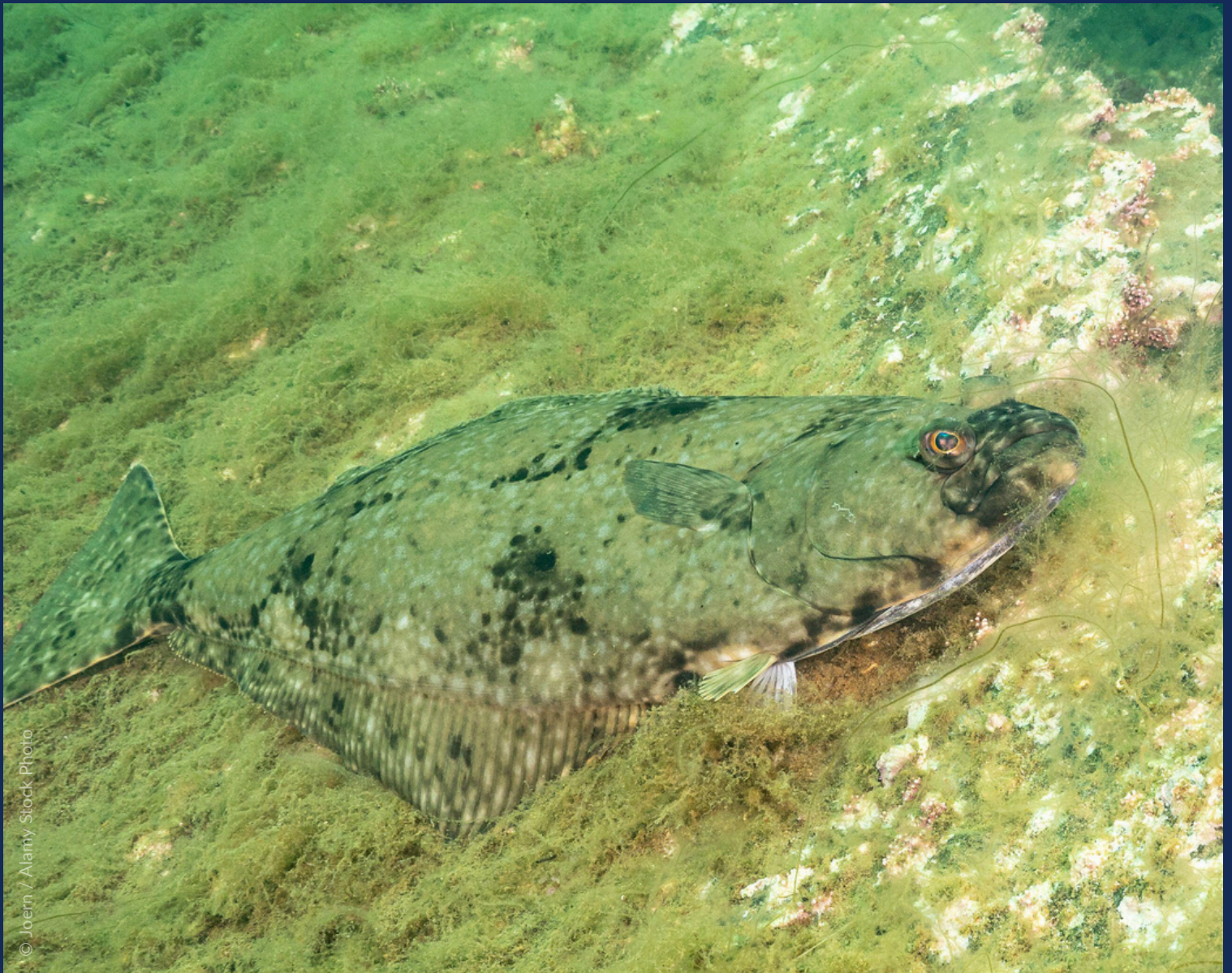




Oceana Canada Recommendations for Gulf Groundfish Management 2025-2026



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March 27, 2025

Carole LeBlanc
Director, Fisheries Resource Management
Gulf Region
Fisheries and Oceans Canada
Carole.LeBlanc@dfo-mpo.ca

RE: Oceana Canada Recommendations for Gulf Groundfish Management 2025-2026

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. This letter contains Oceana Canada's management recommendations, following our participation in the advisory meeting.

Recommendations

As a member of the Gulf Groundfish Advisory Committee that took place March 19-20, 2025, I am writing today regarding the upcoming management decisions for 2025-2026. Oceana Canada appreciates the opportunity to contribute to this process and speak to the science advice, policy and regulatory requirements for managing groundfish in the Gulf region. We respectively recommend the following measures:

- 1. Follow the rebuilding plan management measures for five Gulf groundfish** to mitigate bycatch in interacting fisheries, increase monitoring and further scientific research.

We are encouraged by the new measures introduced in the recently published rebuilding plans for **American plaice (4T), winter flounder (4T), white hake (4T), southern Gulf cod (4TVn), and northern Gulf cod (4RS3Pn)**. These steps are important to help minimize preventable declines and protect critically depleted groundfish stocks, ensuring stocks retain the potential to rebuild should environmental conditions improve. We support advancing monitoring measures—such as mandatory VMS and piloting electronic monitoring—for all catches in interacting fisheries. In the interest of transparency, we also request that the department provide committee members with

in-season updates on bycatch caps and any resulting management actions, including closures or flexibilities like the one tonne transfer of hake bycatch to the Atlantic halibut fishery in 2024. As discussed in the meeting, avoiding bycatch hotspots is essential to prolong the viability of interacting fisheries like **Atlantic halibut and redfish** while minimizing harm to critical stocks. **For northern Gulf cod**, we support implementing the harvest control rule (HCR) outlined in the new rebuilding plan, which sets a fixed total catch limit of 500 tonnes from all fishery-related sources, including a 150 tonne cap for bycatch, along with all other measures specified in the plan.

2. Initiate rebuilding plan for yellowtail flounder (4T).

This stock has been identified as a candidate for inclusion in the next list (second batch) of stocks managed under section 6.2 of the Fish Stocks provisions in the modernized *Fisheries Act*. Given the stocks' critical status, a rebuilding plan should be initiated. The closure of the directed commercial fishery must be maintained while the plan is under development and management measures consistently applied in line with other closed groundfish fisheries.

3. Adopt a lower HCR for Greenland halibut (4RST) and initiate rebuilding measures.

Greenland halibut is at the lower end of the cautious zone, above the limit reference point with moderate certainty, but has shown a sharp decline since 2020 and faces low productivity due to poor prey availability and weak recruitment. Applying the HCR permits a maximum exploitation rate of 2.58% (up to 290 tonnes) for 2025–2026; however, given the stock's continued declining trajectory, we recommend setting a catch lower than 290 tonnes for 2025, initiating rebuilding measures and reassessing the catch limit in 2026. Additionally, gillnet soak time regulations (max. 72 hours) may be allowing for additional risk of bycatch and high unreported mortality, potentially five times the landed catch. We support continued monitoring and investigation into reducing soak time to a maximum of 48 hours, in collaboration with the fishing industry to assess both its feasibility and effectiveness.

4. Increase Atlantic halibut (4RST) quota, consistent with low risk of bycatch.

Atlantic halibut (4RST) is currently in the healthy zone with high certainty, reaching its highest biomass level since 1983. Five landing scenarios were presented for the next two years, ranging from 2,466 to 4,932 tonnes, with 3,699 tonnes identified as the highest catch level that would not negatively impact biomass. Based solely on stock biology, we would support a TAC of up to 3,699 tonnes. However, the halibut fishery interacts with several critically depleted groundfish stocks. Therefore, an ecosystem approach is needed—raising the quota responsibly to avoid significantly increasing bycatch risk. The redfish quota should also be considered within this context, given similar bycatch concerns and overlapping fisheries. Therefore, we support a moderate increase in TAC for 2025-2026, including 95 tonnes allocated to conducting the scientific longline survey.

5. Enforce the Gulf region's Code of Conduct for Fisheries Management Advisory Committee Meetings.

The updated Terms of Reference and Code of Conduct set out fair and equitable principles to create a respectful and inclusive space for sharing perspectives and knowledge. Unfortunately, during the March 19–20 meetings, the Code of Conduct was breached on at least two occasions, with misogynistic and derogatory remarks. Such comments are unacceptable. Moving forward,

consistent enforcement of the Code of Conduct at all advisory committee meetings is essential to maintaining a professional and productive environment.

Additional components of advice include:

Regulatory Guidance

As stipulated in **section 6.1** of the Fish Stocks provisions, the Minister of Fisheries and Oceans Canada is mandated to implement measures that maintain major fish stocks at levels that promote their sustainability, accounting for biological factors and environmental conditions. As stipulated in **section 6.2** of the Fish Stocks 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 to implement it within the period provided for in the plan.

Currently, American plaice (4T), winter flounder (4T), white hake (4T), southern Gulf cod (4TVn), and northern Gulf cod (4RS3Pn) are included in the Fish Stocks provisions and **subject to section 6.2** rebuilding plan requirements. Yellowtail flounder (4T) is proposed for listing and will require a rebuilding plan under **section 6.2**. Atlantic halibut (4RST) and witch flounder (4T) will be managed under **section 6.1**. Greenland halibut (4RST) is proposed for listing and declining toward the critical zone. In line with the Precautionary Approach, a proactive step would be to begin a rebuilding plan now.

Ecosystem Approach

Many perspectives were shared on the need to move beyond incorporating environmental variables into single species assessments and toward a more integrated ecosystem approach to fisheries management. We strongly emphasize that overharvesting one species to support the rebuilding of another is not a sustainable or viable strategy, a point clearly acknowledged in the southern Gulf cod rebuilding plan. To ensure long-term sustainability and resilience of marine ecosystems, we encourage the department to advance its Ecosystem Approach to Fisheries Management (EAFM) and move toward a comprehensive Ecosystem-Based Management (EBM) framework. This would align with leading international best practices that consider species interactions, habitat, climate change, and cumulative impacts across fisheries.

Conclusion

While a number of groundfish stocks currently face a poor outlook, after 30 years of depletion, there are promising signs of advancements and support for recovery because of the progress on rebuilding plans. Thank you for considering our recommendations and we look forward to continuing our work with the advisory committee to ensure abundant and economically viable fisheries in the Gulf of St. Lawrence.

Sincerely,



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