



Oceana Canada Recommendations for Northern Cod Management 2025-2026



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CC: Robyn Lee
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RE: Oceana Canada Recommendations for Northern Cod Management 2025-2026

Dear Robyn Morris 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 recent observer at the 2+3KLMNO Groundfish Advisory Committee Meeting for northern cod that took place April 7, 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 Newfoundland and Labrador region. We respectively recommend the following measures:

1. **Follow the rebuilding requirements in the *Fisheries Act* and the Precautionary Approach (PA) policy** to minimize the risk of stock decline and support rebuilding by setting the TAC at 60 per cent of current authorized levels.

For 2025-2026, we recommend limiting total removals to no more than 12,800 tonnes, inclusive of all sources of fishing mortality - commercial, recreational food fishery (~2,700 tonnes), Food, Social and Ceremonial (FSC), bycatch, and sentinel fisheries. This recommendation is informed by stock projections and is designed to meet both the *Fisheries Act* Fish Stocks provisions and PA policy thresholds: avoid decline to or below the Limit Reference Point (LRP) with a high to very high likelihood (≥ 75 per cent), maintain a very low (less than 5 per cent) to low (5–25 per cent) risk of preventable decline, and promote stock growth¹².

Without a confirmed Upper Stock Reference (USR), the precautionary approach should assume that cod are in a cautious state given other reviewed indicators of outlook and stock health (e.g., low productivity, low weight at age, contracted age structure). It is inappropriate to assume that the stock is healthy, especially under a new assessment framework that has only been tested for two years and is presenting systematic uncertainties. Compared to the previous LRP or, average Spawning Stock Biomass (SSB) during the 1980s, the stock would be considered 86 per cent of the LRP.³

The most recent assessment indicates that the SSB in 2025 is projected at 2.0 (1.2–3.3) times the current LRP, with <1 per cent probability of being in the critical zone. However, the stock's overall trajectory remains flat, productivity is low, and rebuilding has stalled. Importantly, the three-year projections under all catch scenarios show moderate to high probabilities of SSB decline (56–71 per cent). For example, at the status quo total removal level of 21,317 tonnes, the probability of entering the critical zone by 2028 rises to 20 per cent, increasing to 27 per cent under a doubling of that removal level.

Catches below 12,800 tonnes represent the only viable option that aligns with the very low (less than 5 per cent) risk tolerance for preventable decline outlined in the PA policy. Even in the absence of fishing, there is already a 56 per cent probability that the stock will decline by 2026. Introducing removals of 10,658 tonnes raises that probability to 59 per cent (or 3 per cent risk of preventable decline), and it climbs to 63 per cent (or 7 per cent risk of preventable decline) at 21,317 tonnes. From a risk management perspective, higher catch levels not only increase the likelihood of decline but also heightens the consequences. This scenario would bring the stock closer to the LRP, reducing its resilience, and potentially prolonging the time needed for recovery.

Given the accumulating risk, uncertainties in non-commercial removals, and moderately high probability of further decline, we advise a precautionary reduction in overall fishing pressure. A total removals cap of 12,800 tonnes allows for access by all users, while upholding legal and policy requirements to prevent further stock deterioration. This recommendation should be paired with

¹ Fisheries and Oceans Canada. 2022. Guidelines for Implementing the Fish Stocks Provisions in the Fisheries Act. Available at: <https://www.dfo-mpo.gc.ca/reports-rapports/regs/sff-cpd/guidelines-lignes-directrices-eng.htm>

² Fisheries and Oceans Canada. 2009. A fishery decision-making framework incorporating the precautionary approach. Available at: <https://www.dfo-mpo.gc.ca/reports-rapports/regs/sff-cpd/precaution-eng.htm>

³ Average SSB in 1980-1989 is 609 kt and 2025 SSB is estimated to be 524 kt, according to the latest stock assessment.

urgent improvements in catch monitoring, especially in the recreational fishery, to ensure future advice reflects the full scope of removals with greater precision.

2. Trigger a review of the stock assessment framework and establish an interim target while developing key elements of the PA framework.

To ensure that management decisions for northern cod are based on a scientifically sound and widely supported foundation, we recommend triggering a review of the current PA framework to resolve concerns around potential model misspecification. Building a long-term management framework on an uncertain analytical base risks perpetuating policy misalignment, stakeholder mistrust and management ineffectiveness. A robust framework must rest on transparent, peer-reviewed science that is open to expert scrutiny and stakeholder engagement.

Two key actions are needed to make this review process meaningful and advance effective management. First, all relevant science, including the 2023 framework review Research Documents, must be published on the CSAS website prior to the meeting. This ensures transparency and allows a wider group of cod scientists and external experts - many of whom have voiced concern over the current modelling approach - to meaningfully engage with the framework's scientific foundation.

Second, in the absence of finalized benchmarks like the USR or Target Reference Point (TRP), we recommend that the PA Working Group adopt an interim biomass (or proxy) target to guide decisions and support rebuilding. In line with the *Guidelines for Implementing the Fish Stock Provisions of the Fisheries Act*,⁴ this objective could be: "Maintain spawning stock biomass at or above $0.5B_0$ with at least 50 per cent probability over three cod generations." This interim target reflects the minimum biomass level necessary to promote sustainability and offers a clearer, more biologically meaningful benchmark than simply remaining above the LRP.

Once the framework is reviewed and these issues are addressed, the development of a full PA framework—including USR, TRP, and Harvest Decision Rules (HDRs)—can proceed with greater confidence. This is essential to support sustainable recovery and effective governance of the northern cod stock, and to build a management system that is scientifically rigorous and aligned with the requirements of the *Fisheries Act*.

3. Account for total catches by advancing monitoring initiatives, including the Fishery Monitoring Policy for this stock by the end of fiscal year 2025-2026 as outlined in the Sustainable Fisheries Framework Work Plan⁵.

The Auditor General's report⁶ has emphasized the lack of measurable monitoring objectives for the northern cod fishery. As of 2023, northern cod is designated a priority stock with funding

⁴ The guidelines state that if a stock does not have a defined RR, USR and/or TRP, management measures must seek to avoid stock decline with high likelihood and define an interim measurable biomass (or proxy) target related to stock growth while a USR is being established. Management measures must seek to support stock growth to the interim target.

⁵ Fisheries and Oceans Canada. 2024. Sustainable Fisheries Framework work plan for fiscal 2024-2025. Available at: <https://www.dfo-mpo.gc.ca/about-notre-sujet/publications/work-plan-travail/2024-2025/wp-pt-eng.html>

⁶ Office of the Auditor General of Canada. 2023. Report 9—Monitoring of marine fisheries—Fisheries and Oceans Canada. Available at: https://www.oag-bvg.gc.ca/internet/English/att_e_44377.html

allocated to advance the Fishery Monitoring Policy. Both the gap analysis (Step 2) and conducting stakeholder consultations to establish monitoring objectives (Step 3) must be completed this year for the DFO to follow through on their commitments.

The recreational or food fishery is a culturally significant way for people to engage with the fishing heritage of northern cod. However, it contributes to total removals and must be allocated from the existing TAC. This is essential as estimates in 2024 reached 2,697 tonnes (95 per cent CI = 1,653–4,110). Without direct measures of these landings, sustainable harvest levels cannot be set or assessed, which undermines efforts to support the stock's recovery. Current management decisions under the Fish Stocks provisions require an understanding of total removals, yet there is no reliable monitoring of recreational catches. In response, it is strongly recommended that DFO co-develop a monitoring program for the food fishery in collaboration with Indigenous Peoples and stakeholders, including people who currently sit outside of the Advisory committee process. This program should consider practical tools such as mandatory logbooks, app-based reporting, and licensing to enable accurate estimates of total fishing mortality. Alongside this, the mark-recapture tagging program, which provides crucial data for stock assessment, must remain a scientific priority and continue with the department's support. These steps are essential to improve data quality, meet management responsibilities, and ensure the long-term recovery of northern cod.

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.

Upon listing in 2022, northern cod was subject to 6.1 and required an updated, high-quality rebuilding plan. Due to the new assessment framework and lowering of the LRP, northern cod is considered above the LRP and **subject to section 6.1**. The letter and intent of the Fish Stocks provisions remains to minimize the risk of preventable decline and manage the stock to healthy levels. As stated earlier, this includes prioritizing setting an interim benchmark and setting harvest levels according to a very low risk tolerance for decline while long-term rebuilding measures are in development.

Ecosystem Approach

Northern cod, a key predator of capelin and an indicator for finfish population health, remains in a depleted, cautious state and continues to struggle to rebuild. While there are uncertainties in the new stock assessment model, the trend is clear: northern cod is stagnating or declining, largely due to the lack of capelin, their primary food source. Cod cannot recover without capelin, yet current management fails to account for this critical ecological link, especially as climate change continues

to intensify pressures on ocean health. Robust, coordinated measures must be implemented this year to seize this opportunity before the window for recovery narrows further.

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.

Socio-Economic Considerations

Under the *Fisheries Act*, socioeconomic considerations must be addressed through the lens of promoting sustainability (section 2.5), with priority given to the biology of the fish and environmental conditions (section 6.1). Managing for growth means rebuilding the stock now to unlock greater and more stable economic benefits in the future. Reducing fishing in the near-term is a strategic socioeconomic investment in a smarter, more resilient seafood future. Research shows that northern cod could recover within 11 years, creating up to 16 times more jobs and generating \$233 million in economic activity⁷ - far surpassing short-term returns. Maintaining high removals risks trading this long-term potential for immediate but limited gains, as was the case last year.⁸ Where decisions depart from scientific advice for socioeconomic reasons, a clear and robust analysis must justify and transparently communicate the trade-offs.

Conclusion

While the recent northern cod assessment includes short-term positive signals, other metrics of stock health remain in a cautious state and the outlook remains poor, primarily due to a lack of capelin. After 30 years of depletion, northern cod and the fisheries that depend on it deserve a better plan, that includes predictable and science-based measures to bring the stock to full health. 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 Atlantic Canada.

Sincerely,



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⁷ Sumaila, U. R., & Teh, L. 2019. Economic and social benefits of fisheries rebuilding: Six Canadian case studies. Oceana Canada. Available at: <https://oceana.ca/en/reports/economic-and-social-benefits-fisheries-rebuilding/>

⁸ In 2024, DFO staff were questioned at the Standing Committee on Fisheries and Oceans on the study, "*The Impact of the Reopening of the Cod Fishery in Newfoundland and Labrador and Quebec*". DFO staff state the Minister's decision was based solely on "year-round" employment. In reference to potential economic benefits, DFO staff state "we don't have specific, hard data per se. We have general ideas..." Available at: <https://www.ourcommons.ca/DocumentViewer/en/44-1/FOPO/meeting-120/evidence>