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Oceana Canada Recommendations for Unit 1+2 Redfish Management 2025-2026

Oceana Canada
Halifax Office
1701 Hollis St, Suite 800
Halifax, NS Canada B3J 3M8

+1.844.362.3262
OCEANA.CA

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Todd Williams
Chair, Atlantic Mackerel Advisory Committee
Senior Director, Resource Management
Fisheries and Oceans Canada
Todd.Williams@dfo-mpo.gc.ca

CC: Liliya Baranova
Senior Policy Advisor
Fisheries and Oceans Canada
Liliya.Baranova@dfo-mpo.gc.ca

RE: Oceana Canada Recommendations for Unit 1+2 Redfish Management 2025-2026

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 and request for membership following our participation in the advisory meeting.

Recommendations

This letter addresses the upcoming management decisions for the redfish stock in Units 1 and 2, based on observations from the recent Redfish Advisory Committee (RAC) meeting. With the successful recruitment events of 2011–2013 leading to a short-term rebound in redfish stocks, DFO reopened the fishery in 2024 under a phased approach[1], yet market limitations and new management measures have resulted in lower-than-expected fishing effort. While the 2024-2025

[1] In Solution Mode: The Government of Canada launches its transition plan for the future of fisheries in Quebec and Atlantic Canada. Fisheries and Oceans Canada. 2024. Available at: Available at: https://www.canada.ca/en/fisheries-oceans/news/2024/01/in-solution-mode-the-government-of-canada-launches-its-transition-plan-for-the-future-of-fisheries-in-quebec-and-atlantic-canada.html

quota of 60,000 tonnes for Unit 1 redfish presents risks of bycatch and habitat impacts, the limited fishing effort so far has mitigated immediate concerns.[2] However, scientific projections indicate a potential stock decline of up to 90% without new recruitment, highlighting the need for a cautious, adaptive approach. To ensure responsible management, DFO must enforce full monitoring compliance, apply consistent management measures across both Units, and develop science-based harvest control rules by the next season. A measured approach, allowing for sustainable fishing now while preparing for future stock declines, will ensure long-term viability for both industry and ecosystem health. Oceana Canada appreciates the opportunity to participate in this process and respectively recommends the following measures:

1. **Follow science advice and the existing management plan**, including measures to sustain growth and mitigate bycatch.

It is critical to follow scientific advice and retain the strong management measures already in place. These measures were designed through years of collaborative work, including lessons learned during the experimental fishery, and they are essential to sustaining the health of redfish while minimizing harm to depleted and commercially important bycatch species such as Atlantic cod, white hake, and Greenland halibut, as well as protecting sensitive benthic habitats[3].

We support the current measures including to **maintain current seasonal closures, restricted areas, bycatch caps and depth restrictions.** These measures aim to target Deepwater redfish over 22cm and minimize bycatch, particularly of cod and white hake, while maintaining a longer fishing season. **Prohibit bottom and midwater trawling within marine refuges**, which is crucial to mitigate risk of damage caused by unselective or bottom-contacting gear on sensitive species and habitats. Successful trials of excluder grid/separator panels during the experimental period suggest their ability to further mitigate bycatch and warrants continued implementation. **Enforce bycatch limits per trip of either 1-2 per cent or 300kg** for all critical stocks with proposed rebuilding plans, to maximize fishing opportunities for all fleets and prevent triggering closures. **Adopt a move-on protocol** akin to the NAFO model to ensure immediate action if the total bycatch of certain groundfish species exceeds specified thresholds. **Under no circumstance should bycatch be allowed to carry over to the next management cycle.** These measures are consistent with our recommendations to the Gulf Groundfish Advisory Committee on March 27, 2025.[4]

Fisheries perform better when there is accounting of total fishing mortality and use of more selective gears[5]. For the redfish fishery to be a success story, it will take strong management measures such as these and collaboration between DFO and the fishing industry.

2. **Follow the phased approach** by setting the Total Allowable Catch (TAC) at 25,000 tonnes for Unit 1 and 8,500 tonnes for Unit 2 redfish stocks.

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[2] Landings are currently estimated at 2,970 tonnes or 5% of the TAC in Unit 1 and 3,458 tonnes or 40% of the TAC in Unit 2, as presented to the Redfish Advisory Committee by DFO on April 1, 2025.
[3] Rolland, N., McDermid, J.L., Swain, D.P., Senay, C. 2022. Impact of an expanding Redfish (*Sebastes* spp.) fishery on southern Gulf of St. Lawrence White Hake (*Urophycis tenuis*). DFO Can. Sci. Advis. Sec. Res. Doc. 2022/005. viii + 69 p.
[4] Oceana Canada Recommendations for Gulf Groundfish Management 2025-2026. 2025. Oceana Canada. Available at: https://oceana.ca/wp-content/uploads/sites/24/2025/04/GGAC_OceanaCanada_2025.pdf
[5] Schiller, L., Britten, G. L., Auld, G., & Worm, B. 2024. Learning from positive deviants in fisheries. *Fish and Fisheries*. 25(3), 409-428.

The re-opening of the commercial redfish fishery, first announced on January 24, 2024, was intended to take place in two phases. A first two-year transition phase to allow time for data collection and strengthen the sector's capacity and markets. The second, long-term phase aims to support expansion. A phased and adaptive approach is essential for the reopening of the redfish fishery to balance conservation with economic sustainability. Given scientific projections that redfish biomass could decline to less than 10% of its initial levels within six years under current fishing mortality, compared to 8 years with lower rates, and 9 years without fishing[6] a more gradual quota approach is recommended. Setting an initial Total Allowable Catch (TAC) of 25,000 tonnes and scaling up to 60,000 tonnes over time, contingent on ecological conditions and market readiness, aligns with the objective of avoiding large fluctuations in quotas while maintaining stock health. The current TAC of 60,000 tonnes was not significantly fished, demonstrating that the transition phase requires more time for industry adaptation. Additionally, Unit 2's TAC should remain at 8,500 tonnes, given the limited scientific understanding of Acadian redfish populations, reinforcing the need for a precautionary approach.

Beyond conservation, the two-year transitional phase presents an opportunity to strengthen economic resilience in fishing communities by allowing time for market development, adjustment to new management measures, and reconciliation efforts within the fisheries sector. Ensuring sustainable harvest levels prevents a boom-and-bust cycle that could threaten both stock health and industry viability. The status of Deepwater redfish remains at healthy levels, but large uncertainties persist for Acadian redfish[7], reinforcing the importance of monitoring and adaptive management. A science-driven, economically viable approach, underpinned by robust monitoring, adaptive quota setting, and innovative market strategies, will ensure the long-term sustainability of the redfish fishery while safeguarding marine ecosystems for future generations.

3. **Prioritize implementing the Fishery Monitoring Policy** (FMP), including a robust monitoring program.

Prioritizing fisheries monitoring is paramount to address existing data gaps in the redfish fishery while recognizing the critical importance of this stock to both commercial interests and ecosystem health. The recent findings of the Office of the Auditor General[8] expose the failure to implement the FMP and underscore the urgency of enhancing monitoring efforts.

As presented at the RAC, a suite of complementary tools are used to meet coverage targets, such as 100 per cent dockside and logbook reporting, 100 per cent at-sea observer (ASO) coverage in NAFO Area 4T and winter, and 100 per cent coverage of vessel monitoring systems (VMS) in NAFO Area 4T. Implementing rigorous ASO and dockside monitoring, including the rollout of electronic logbooks and new VMS standards, will provide dependable, timely and accessible fishery data for informed decision-making and compliance enforcement. Enhanced monitoring will also facilitate collaboration between DFO and harvesters to devise innovative solutions and improve fishery viability, ultimately leading to increased market access and eco-certification opportunities.

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[6] DFO. 2024. Unit 1 Redfish (*Sebastes mentella* and *S. fasciatus*) Update in 2023. DFO Can. Sci. Advis. Sec. Sci. Resp. 2024/008.

[7] The status of Acadian redfish (*Sebastes fasciatus*) has large uncertainty from 9 to 371 kt, with a median spawning stock biomass slightly above the proposed Upper Stock Reference point at 190 kt above 178 kt.

[8] Office of the Auditor General of Canada. 2023. Reports of the Commissioner of the Environment and Sustainable Development to the Parliament of Canada. Monitoring Marine Fisheries Catch—Fisheries and Report 9. Oceans Canada.

This is an exciting time for the department because after years of hard work to improve science and policy, redfish's health has benefitted. We are urging DFO to exercise a cautious and measured approach for upcoming management decisions, ensuring healthy redfish are capitalized on for the long-term benefit of the economy and ecosystem. We look forward to continuing our engagement in this process and supporting DFO in their efforts to responsibly steward this stock for long-term health.

Additional components of advice include:

Regulatory Guidance

As stipulated in **section 6.1** of the Fish Stocks 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. 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 implement it within the period provided for in the plan.

The Unit 1+2 Acadian and Deepwater redfish stocks are published in draft regulations[9] to be listed under the Fish Stocks Provisions this year. The Minister must follow sections 6.1 and 6.2 the Fish Stocks Provisions of the *Fisheries Act* for redfish stocks and the rebuilding plan measures for interacting critical groundfish stocks. Management measures under section 6.1 must aim to prevent major fish stocks from falling below their Limit Reference Point (LRP) with ≥75% likelihood, avoid exceeding the Removal Reference (RR) with ≥50% likelihood, and either keep stocks above the Upper Stock Reference (USR) if no Target Reference Point (TRP) exists, maintain stocks at the TRP on average (~50% likelihood).[10] Due to the significant uncertainty in biomass estimates, the absence of reliable removal guidance for Acadian redfish, and unaddressed risks from bycatch of rebuilding groundfish stocks, current potential biological removals fall short of meeting the precautionary thresholds set out in the Fish Stocks Provisions. This underscores the need for more conservative fishing effort until a clear, precautionary framework for managing cumulative impacts is in place.

Ecosystem Approach

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.

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[9] Canada Gazette, Part I, Volume 158, Number 41: Regulations Amending the Fishery (General) Regulations. 2024. Government of Canada. Available at: https://gazette.gc.ca/rp-pr/p1/2024/2024-10-12/html/reg1-eng.html

[10] 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

Additional Request

We would also like to take this opportunity to **request membership to the Redfish Advisory Committee.** Oceana Canada is already productive members of the Gulf Groundfish Advisory Committee, the Scotia Fundy Groundfish Advisory Committee, the Atlantic Mackerel Advisory Committee, and the Gulf Small Pelagics Advisory Committee, among others. Given our expertise on fisheries science and management we would like to be considered as members of RAC. As most Fishery Advisory Committees have at least three Environmental Non-Governmental Organization members, we would like to be included for the opportunity to contribute to the development of management measures that address conservation and the sustainable use of groundfish resources.

Conclusion

The redfish stock, interacting groundfish stocks, and fisheries that depend on them deserve to be managed with predictable and science-based measures designed to protect stock health and provide a safe operating space to adapt to changing ecosystem conditions. 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,

Rebecca Schijns, M.Sc.
Fisheries Scientist, Oceana Canada
rschijns@oceana.ca