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Oceana Canada Recommendations for Northern Cod Management 2025-2026

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

Dear Robyn and members of the advisory committee,

Background

Oceana Canada is an independent charity established to restore Canada's oceans to the richness, health, and abundance they once supported, and is proud to be a part of the largest international advocacy organization dedicated solely to ocean conservation. We respectfully work with civil society, academics, fishers, Indigenous Peoples and governments. As an engaged member of fishery advisory committees across Fisheries and Oceans Canada (DFO) regions, we advocate for science-based fisheries management that rebuilds fish populations and strengthens the economic and nutritional benefits they provide to fishers and coastal communities, now and in the future.

This letter outlines Oceana Canada's management recommendations, following participation in the northern cod advisory meeting on April 8, 2026.

Recommendations

1. **Adopt a precautionary interim harvest strategy with total removals not exceeding 29,579 tonnes.**
2. **Improve transparency, include the recreational groundfish fishery, and close monitoring gaps.**
3. **Strengthen how Indigenous Knowledge Systems and equity are reflected in decision-making.**

We provide more details on these recommendations below.

1. **Adopt a precautionary interim harvest strategy that prioritizes high probability of staying in the "healthy" zone, with total removals not exceeding 29,579 tonnes.**

Given the current stock status and unresolved uncertainty, the most defensible path forward for DFO this year is to adopt a conservative harvest rule that clearly meets legal and policy

thresholds.[1] Management actions must demonstrably avoid decline to or below the limit reference point (LRP) with high to very high likelihood (≥75%), while promoting stock growth above the upper stock reference (USR) with at least moderate (≥50%)— preferably high (≥75%) — likelihood. Based on the risk analysis presented, a total allowable catch of 21,434 tonnes is the only option that achieves a high probability of remaining in the healthy zone in both 2027 and 2028. Maintaining status quo removals, or increasing the catch, reduces this probability to moderate or below. When uncertainty is high, policy and legal obligations are best met by managing to increase the likelihood of keeping the stock above the USR.

While the "Frel" interim harvest strategy proposed by the working group, based on relative fishing mortality using three-year spawning stock biomass average, results in a higher catch level of 29,579 tonnes in 2026, this level was not explicitly evaluated in the risk table and sits close to thresholds where probabilities fall sharply. We recommend that if DFO proceeds with the "Frel" approach as an interim measure, it be implemented in the most precautionary manner, including full application of the three-year smoother. This approach best aligns with policy requirements, reduces the risk of erosion toward the LRP, and avoids sending premature signals that the stock can support increased removals.

This approach is also consistent with lessons from the Precautionary Approach working group process. Participants repeatedly raised concerns about the narrow buffer created by an 80% BMSY USR, particularly given historical stock dynamics and the fact that the USR now lies below the former LRP. While alternative, more productivity-anchored benchmarks (e.g., 60% of unfished biomass over multiple generations) remain more appropriate as long-term recovery targets, they reinforce the same near-term conclusion: conservatism in harvest decisions is warranted until productivity, reference points, and uncertainty are more robustly addressed. A cautious harvest strategy this year preserves management credibility, supports genuine stock rebuilding, and leaves room to adapt as the framework issues are addressed.

2. **Improve transparency, include the recreational[2] groundfish fishery and close monitoring gaps.**

The recreational fishery (including food harvest) is a culturally and socially important way for coastal communities to maintain connections to northern cod and local food systems. However, these social, cultural, and economic values are not yet integrated into cod management objectives or reflected in trade-off discussions. This concern is amplified by the recent level of public engagement: over 9,000 submissions were received through DFO's survey (November 17, 2025 to January 9, 2026), yet there is currently no clear explanation of how this input will be assessed or whether it will meaningfully inform decisions for 2026. This lack of clarity is particularly significant because the recreational fishery contributes to total removals and therefore affects biomass estimates and allowable harvest levels. Participants of the recreational fishery are not currently represented within the advisory committee structure, creating a persistent gap between decision-makers, participants, and affected communities. Any changes to access, limits, or rules

[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] Also recognized as the food fishery, referred to as the recreational fishery here to avoid conflation with Indigenous Food, Social and Ceremonial (FSC) fisheries. This term recognizes that the recreational fishery includes household food harvest, educational programs, tourism- and leisure-based fishing activities.

must be openly discussed, clearly justified, and transparently communicated, with a robust analysis that explains how social, cultural, and food security considerations are weighed alongside scientific advice and the resulting trade-offs.

There is also a clear science and policy gap that must be addressed to meet legal requirements under the Fish Stocks provisions: total catches must account for the recreational fishery, yet there are no direct estimates of removals from this sector. Current estimates by DFO suggest potential removals of approximately 5,000 tonnes, with substantial uncertainty, which meaningfully affects risk calculations and TAC decisions. Despite this, there is no reliable monitoring program in place. Northern cod is identified as a priority stock, funding has been allocated, and DFO has an explicit policy commitment to complete the remaining steps of the Fishery Monitoring Policy this fiscal year. DFO should, therefore, co-develop a monitoring program with Indigenous rightsholders, local communities, and stakeholders, including participants currently outside existing advisory processes, using practical tools such as licensing, mandatory logbooks, and app-based reporting. Improved monitoring would reduce uncertainty, strengthen the scientific basis for decision-making, and ensure total catch accounting is transparent and defensible.

3. **Strengthen how Indigenous Knowledge Systems and equity are reflected in decision-making.**

Despite recent developments to the Precautionary Approach for Northern cod, longstanding gaps remain. Inclusion and equity issues are still entrenched in the current management approach. Indigenous Nations and organizations have consistently raised concerns regarding inequities in allocation, access, and spatial management. These concerns reflect deeper structural issues around whose knowledge, values, and priorities are recognized in fisheries management.

Inclusive fisheries governance is essential to achieving a more legitimate, durable, and holistic management system for northern cod. Management Strategy Evaluation (MSE) processes may offer a practical mechanism to do so, as they are explicitly designed to evaluate trade-offs among multiple objectives. Emerging guidance — such as a recent practitioner guide[3] on pairing Indigenous and Western knowledge systems — also provides a clear foundation for working collaboratively and respectfully with Indigenous partners. This has been done successfully in the Haida Gwaii Pacific herring rebuilding plan. MSE was used to test management options against rebuilding objectives informed by Haida knowledge across a range of scenarios, within a governance structure built on collaboration. Addressing equity in this way can strengthen the integrity of the management framework.

Additional components of advice include:

Regulatory Guidance

As stipulated in section 6.1 of the Fish Stocks provisions, the Minister of Fisheries is mandated to implement measures that maintain major fish stocks at levels that promote their sustainability,

[3] Frid, A., Paul, K., Ban, N.C., Cripps, K., Harper, S., Forrest, R.E., Holt, C., Curtis, D.L., Watkins, H., Rangeley, R., Cleary, J., Evanson, M., Lochead, J., 2026. A Practitioner's Guide for Pairing Indigenous and Western Knowledge Systems for the Management of Canada's Marine Fisheries. Coastal First Nations--Great Bear Initiative, Vancouver, BC. https://coastalfirstnations.ca/wp-content/uploads/2026/03/Good-Practices-Pairing-Indigenous-and-Western-Knowledge-Systems.pdf

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 6.2 and required an updated, high-quality rebuilding plan. Due to the new assessment framework in 2023, and lowering of the LRP, northern cod is considered above the LRP and subject to section 6.1. The intent of the Fish Stocks provisions is to minimize the risk of preventable decline, ensure stocks remain above the USR with at least a moderately high likelihood, and promote stock levels towards a target reference point (we suggest 60% of unfished biomass).

Ecosystem Approach

Northern cod recovery remains strongly constrained by ecosystem conditions, particularly the persistently low abundance of capelin, its primary forage species. Recent ecosystem science and assessment work consistently identifies capelin availability as a key limiting factor on cod productivity. Capelin biomass remains far below historical levels and shows limited sustained recovery since collapse. Given the chronic prey limitation, continued fishing pressure on capelin risks further constraining a food-limited cod population. Pausing the commercial capelin fishery is the most direct way to improve forage conditions and support cod rebuilding. Cod and capelin management should be coordinated through an ecosystem approach that treats capelin as a binding constraint on cod recovery.

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. While increasing fishing pressure may support immediate industry activity, it increases the risk of prolonging low biomass conditions. It also delays access to higher-value fisheries, more stable yields, and potential market advantages associated with sustainability certification. These benefits depend on demonstrably strong stock status and precautionary management credibility. Maintaining high removals risks trading this long-term potential for unclear reasons, as was the case for the last two years.[4]

Conclusion

While recent northern cod assessments show short-term positive signals under revised reference points, multiple indicators confirm that the stock remains well below historically productive levels and is still rebuilding rather than a recovered. After 30 years of depletion, the fisheries and communities that depend on northern cod deserve better. Northern cod urgently needs

[4] 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

predictable and science-based measures to bring the stock back 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 thriving fisheries in Atlantic Canada.

Sincerely,

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