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OCEANA CANADA'S RECOMMENDATIONS FOR 2J3KL COD MANAGEMENT DECISIONS



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The Honourable Joyce Murray, P.C., M.P.
Minister of Fisheries, Oceans and the Canadian Coast Guard
Fisheries and Oceans Canada/Government of Canada
200 Kent Street
Ottawa, ON K1A 0E6

Dear Minister Murray,

I trust this letter finds you and your team well. Oceana Canada acknowledges the hard work you and the department have been doing in recent months to ensure Canada's fisheries have a sustainable future, especially in respect of the newly released rebuilding regulations under the Fisheries Act, which may mark a turning point for the abundance of Canada's wild fish.

I am writing today to provide Oceana Canada's recommendations for the 2J3KL cod stock in 2022/23 regarding harvest levels and management decisions. We recommend the following measures to facilitate sustainable northern cod fisheries:

1. **Follow scientific advice and keep fishing removals to the lowest possible level by adopting a more precautionary TAC for the stewardship fishery of 4,300 metric tonnes.**
2. **Close the recreational fishery until fishing mortality from this source is properly monitored.**
3. **Prioritize developing and implementing a rebuilding plan that is compliant with the new rebuilding regulations published in *Canada Gazette*, Part II.**

This year marks the 30th year since the Northern cod commercial fishery closure, yet the stock remains deep in the critical zone, where, according to the new regulations,¹ any fishing of the stock must be consistent with the rebuilding of the stock above the limit reference point, and removals from all sources must be kept to the lowest possible level until it has cleared this zone.^{2,3} Allowing for continued high catches or an increase in harvest levels, combined with unknown fishing mortality in the recreational fishery, contravenes DFO's Precautionary Approach and science advice. The quota should be reduced to allow the best chance for the stock to recover.

Considering the absence of an updated assessment, high levels of uncertainty in natural mortality, and changing conditions in the broader ecosystem that are expected to negatively impact Northern cod productivity, we urge the department to be more precautionary in its decision making to rebuild the stock. Oceana Canada recommends that catches return to a more responsible level of 4,300 tonnes for the stewardship fishery, which corresponds to previous harvest levels and conditions where a peak in abundance was observed.⁴ According to the 2020 status update,⁵ cod stock growth has stalled since 2016 based on the lack of increase in cod survey indices. Since 2016, higher catches

may be exerting too much fishing pressure to allow for sufficient recovery.⁶ Importantly, keeping fishing pressure low enables a faster rebuilding period for the long-term prosperity⁷ of coastal communities and a resilient population in the face of changing climate conditions.

There is also substantial, yet unaccounted for, fishing pressure from the ongoing recreational fishery.^{3,4,5} Thus, total fishing mortality may be underestimated, and biomass may be overestimated. Considering this large source of uncertainty, the department should close the recreational fishery, while developing an adequate monitoring framework to enable timely and accurate catch estimates. We recommend the stock be prioritized for immediate implementation of the new national Fishery Monitoring Policy.

The Northern cod rebuilding plan must be strengthened to comply with the amended *Fisheries Act* and newly published regulations, which prescribe the information required in rebuilding plans. The current rebuilding⁸ plan published in 2021, has faced criticism^{9,10} and lacks information that is now required by law. Oceana Canada assigned scores to available rebuilding plans based on the minimum standards generally required for rebuilding plans in other jurisdictions, which have been demonstrated to successfully rebuild fish populations. Northern cod failed to meet over half of the minimum criteria.⁹

By following science advice for the annual quota, monitoring and accounting for the recreational fishery, and quickly strengthening the rebuilding plan to comply with new regulations,^{1,11} DFO can finally, 30 years after the commercial closure, provide Northern cod with the opportunity to recover to abundance.

We appreciate your consideration of our input.

Sincerely,



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Citations

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