

May 3, 2022

OCEANA CANADA'S RECOMMENDATIONS FOR 4RST GULF CAPELIN MANAGEMENT DECISIONS



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4 April 2022

Dear Erin,

Please accept Oceana Canada's recommendations for upcoming harvest decisions for 4RST capelin in the Gulf of St. Lawrence. I appreciate the opportunity to observe the Advisory Committee Meeting on April 25, 2022 and to submit our comments to you. Oceana Canada respectfully recommends the following with regards to 4RST capelin:

- 1) Implement a Total Allowable Catch (TAC) of no more than 12,000 mt.**
- 2) Continue the development of a Limit Reference Point and begin the development of an Upper Stock Reference and Harvest Control Rule to manage 4RST capelin under the Precautionary Approach Framework¹, in a manner appropriate for forage fish.**

At the 2022 stock assessment for 4RST capelin,² the state of the stock was presented as a composite of several indices describing the presence of capelin in the diets of predators, estimated relative abundance from bottom-trawl surveys, and the timing of ice retreat in the Gulf of St. Lawrence. Though the composite index encompasses wide margins of uncertainty, the state of the stock appears to be stable, if not trending slightly upwards in the past three years.

As a forage fish, capelin are highly important constituents of the marine food web³ of the Gulf of St. Lawrence, feeding other species of fish, marine mammals, and seabirds. Forage fish including capelin are also known to withstand high levels of natural mortality due to predation. Since 2015, the contribution of capelin to the stomach contents of both Atlantic cod and Greenland halibut remained steady or saw an increase, indicating that the ecological role of the stock is not likely to be compromised.

In addition, the order of magnitude of fishing mortality in relation to natural mortality was estimated using a range of catchability values across different levels of plausibility. In all cases, fishing mortality was estimated to be well within levels that would not likely cause a decline in

¹ DFO. 2009. A fishery decision-making framework incorporating the precautionary approach. Available from: <https://www.dfo-mpo.gc.ca/reports-rapports/regs/sff-cpd/precaution-eng.htm>

² DFO. 2022. Assessment of capelin in the Estuary and Gulf of St. Lawrence (4RST) in 2021 (unpublished).

³ Guénette, S., Melvin, G., Bundy, A. 2014. A review of the ecological role of forage fish and management strategies. Can. Tech. Rep. Fish. Aquat. Sci. 3065.

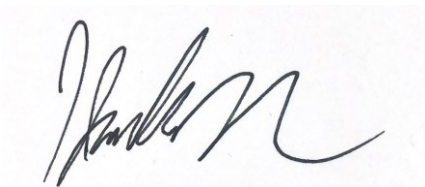
biomass. At the 4RST Capelin Advisory Committee Meeting, industry participants advocated for an increase in TAC of approximately 54%, from the current quota of 9,259mt to 14,300mt, the TAC from 2013-2017. Oceana Canada recommends a more precautionary management decision to not exceed a TAC increase of 30%, to 12,000mt for the 2022/23 fishing seasons. This amount is slightly below harvest levels allocated from 2005-2012, during which time the composite index of stock state showed consistent stability and possible signs of improvement.²

Oceana Canada also urges the development of a Limit Reference Point for 4RST capelin in the immediate short term to better understand the current health of the stock and more clearly inform harvest level decisions. 4RST capelin currently lack all reference points necessary to ascertain stock status under the Precautionary Approach, and continued management under these conditions poses risks of undetected overfishing. As such, we encourage the Department to refrain from further TAC increases until a Limit Reference Point is in place for 4RST capelin, which should ideally be completed within the next 12 to 24 months. In addition, Oceana Canada strongly recommends the commencement of Upper Stock Reference and Harvest Control Rule development to manage this forage fish stock appropriately under the Precautionary Approach Framework and as required under Canadian law following recently enacted regulations prescribed to the amended *Fisheries Act*.⁴

We acknowledge that the recommendation that Oceana Canada made for 2J3KL capelin includes a much more drastic management action to close the fishery for that stock. These two stocks have different exploitation histories, and while such an exceptional action as closing the fishery is required for 2J3KL capelin rebuilding, we agree that is not necessary for 4RST capelin. It is important that Fisheries and Oceans Canada continues to act in a precautionary manner for stocks with great uncertainty, ensuring that management both promotes sustainability and supports the local communities who rely on the 4RST capelin fishery.

We hope you will take our recommendations into consideration. Thank you once again for the opportunity to contribute to this process.

Warmly,



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⁴ Canada Gazette Part II. 2022. Regulations Amending the Fishery (General) Regulations: SOR/2022-73. Available from: <https://www.canadagazette.gc.ca/rp-pr/p2/2022/2022-04-13/html/sor-dors73-eng.html>