

March 24th, 2020

Hon. Minister Jordan
 Minister of Fisheries, Oceans and the Canadian Coast Guard
 200 Kent Street, Ottawa, ON

Re: Atlantic Mackerel TAC and Management for 2020 season

Dear Hon. Minister Jordan,

The Ecology Action Centre is Atlantic Canada's oldest and largest environmental organization, founded in 1971. We sit on the Atlantic Mackerel Advisory Committee and are part of the Mackerel Rebuilding Working Group. We are writing to urge you to make the difficult decision to close the Atlantic mackerel commercial, bait, and recreational fisheries or reduce the TAC to 2000t to allow some mackerel to be caught for bait and local food consumption. This level may offer enough reprieve to this stock for some biomass increase to be realized.

The 2019 Atlantic mackerel science assessment was very alarming. The biomass continues to be in the critical zone (since 2010), the recruitment is the lowest it has been in any time series, and the age structure is extremely truncated. As seen in **Figure 1** below, the fishery is currently depending on ONE year-class (2015) and there are no signs of strong recruitment taking place after this year class has been wiped out. In 2018, 75% of the catch was made up of the 2015 year-class and DFO Science currently estimate that a 45% exploitation rate of this extremely important year class is continuing on an annual basis. At this rate we may already be too late to save this stock. Protecting the 2015 year-class as it ages to increase spawning success may be pivotal to the recovery of this important Atlantic fishery and traditional food source.

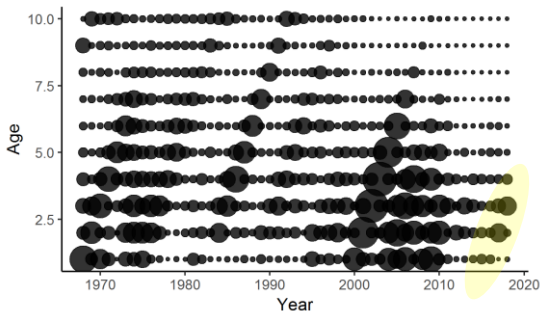


Figure 1. Catch-at-age data calculated from samples from the commercial fishery (1968-2018). Highlighted area is the 2015 year-class and years below it that are not strong for future fishing of this stock. 2019 CSAS Science Advisory Report.

Science has been clear – the bottom line is that, a decrease in the amount of Atlantic mackerel being fished is **required** to allow both the biomass and the recruitment of fish to increase. The Atlantic mackerel population has been overfished since 2008 and overfishing is **still** ongoing. At this time, the most equitable and clear measure is TAC reduction along with improved monitoring and reporting. While we appreciate the effort to create a suite of measures around gear modification, minimum size, and seasons, it was clear at the Atlantic mackerel Rebuilding Plan Working Group meeting that no consensus could be reached and these measures will severely impact some fishers in various ways. Such mitigation measures will not sufficiently lower the overall mortality to promote recovery. Bold action for the next few years to ensure the Atlantic Mackerel stock can increase out of the critical zone

is preferable. Small management steps will ultimately not be enough to halt the decline, thus prolonging the sacrifice of our fishing fleets.

DFO Science identified the increasing ecosystem changes this stock is also adapting to. *Calanus finmarchicus*, the zooplankton Atlantic mackerel feed upon, are declining due to increase water temperatures causing an increase in Natural mortality. The growing natural pressures along with years of overfishing that continue, have disabled any chance this fish stock will have at recovering. DFO has the responsibility to look after the health of this stock and must act to reduce fishing mortality – the one pressure we have control over.

The projections presented by DFO Science show that with a 0 TAC, there is a 77.5% chance or, 'high' probability of growth. This meets the Precautionary Approach standards and is the required target stated in DFO's own Rebuilding Plan and Sustainable Fisheries Framework Policies. As noted in these policies, there should be 'no tolerance for preventable decline' when stocks are in the critical zone. A 0 TAC also offers a 68% probability of increasing the population above the LRP.

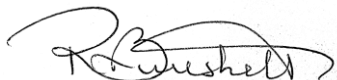
It is also important the department continue with increased efforts to ensure all discards, bait licence catch, and recreational catch is reported across all Regions.

We understand the difficult times upon us right now because of COVID-19 and how this added reduction of quota may add extra financial pressures to our coastal communities. The EAC supports sustainable fishing that are important culturally, traditionally, and economically here in Atlantic Canada. At a 0 – 2000T TAC level, we urge you to consider supporting smaller fleets and fishermen whose margins are too slim to absorb the loss of the mackerel portion of their income or bait.

It is crucial to keep in mind that decisions made in this fishery impact far more fisheries and species than just mackerel commercial fishing. Atlantic mackerel is an important source of bait for the Atlantic bluefin tuna, and lobster fisheries. This small fish is also an important prey species for countless seabirds, marine mammals, and larger fish. Keeping the complex ecosystem healthy by ensuring key species like Atlantic mackerel are thriving is imperative if we are to see recovery of our fish stocks and fisheries that rely upon them.

EAC recognizes the enormous amount of work the DFO science team has done on this fishery. We look to the Federal Government to increase funding to DFO Science to support their work in current areas and other areas off Newfoundland where they are data deficient. This crucial work is needed more than ever at this time to inform our fisheries assessments and marine management goals. The science is robust, however with rapidly shifting ecosystems in the Gulf, we will need to be on the water more to ensure Science is capturing potential shifts in spawning time, oceanographic changes, shifts in available prey, and impacts on the web of species and fisheries that rely on this important species.

Sincerely,



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cc:
Brian Lester- Chair, Atlantic Mackerel Advisory Committee (AMAC)
Jenness Cawthray- Senior Fisheries and Aquaculture Management Officer
Derek Mahoney- Senior Advisor, International Fisheries Management and Bilateral Relations