



February 27, 2024

The Honourable Diane Lebouthillier,
Minister of Fisheries, Oceans, and the Canadian Coast Guard
200 Kent St
Ottawa, ON, K1A 0E6
Via email: min@dfo-mpo.gc.ca

Re: Atlantic Mackerel Management and TAC for 2024 Season

Dear Minister,

The Ecology Action Centre is Atlantic Canada's oldest 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 strongly recommend a continued closure of the commercial Atlantic Mackerel fishery until there is new science clearly showing that the stock has rebuilt out of the critical zone. We also recommend that you announce a multi-year closure decision to reduce uncertainty.

We recognize that the decision to close the fishery over the last two years was a challenging one, and the impacts have been felt in our rural communities across the region. However, with the most recent assessment showing that the stock is at its lowest level ever recorded (42% of Limit Reference Point), we must make decisions based on the highest probability of rebuilding and focus on the impact we can control – fishing mortality. Past management decisions that did not prioritize growth, leaving the recovery of this species up to the flip of a coin, are not acceptable.

Given that this is not an assessment year, there is currently no new information to suggest that a decision to open this fishery for the 2024 season is justified. We have no indication yet of any effects of the closure on recruitment and population growth. Having a discussion around catch in 2024 without a new scientific assessment would be premature.

The most recent work done by DFO Science concludes that "rebuilding the stock will also require rebuilding the age structure of the stock which has been eroded by overexploitation". Unfortunately, even large recruitment events have been quickly eroded by high exploitation rates in the past as shown by the 2015 age class. This cohort could have "rescued" the population but was effectively fished out in two years – in 2019 they were 75% of the landings and now only represent 7% of the total population. This large recruitment event was an opportunity to meet rebuilding objectives but was wasted by maintaining high exploitation rates. We must learn from this experience and make sound management decisions for the sake of the Mackerel population.

Further, additional work done by DFO Science to better understand mackerel spawning has increased our confidence in the stock assessment. DFO Science provided multiple lines of evidence showing that majority of spawning is occurring in the southern Gulf of St Lawrence, which is not at odds with the high local abundances being reported around many parts of Newfoundland but is also not a sign of increased abundance overall.

According to the projections, a TAC of 0t is the only scenario with a high likelihood of short-term population growth (85-92% probability) that is in line with the Precautionary Principle and Section 70(5) of the Fishery (General) Regulations and therefore is consistent with rebuilding.

Opening the fishery, even with a small TAC of 1000t would risk the rebuilding of this stock, and the long-term economic viability of the fishery. Further, managing a fishery with a low TAC, would be incredibly challenging and would serve very little economic benefit to the industry in the short-term.

Committing to a multi-year decision on TAC will also allow more time and space for other important discussions and work with stakeholders and rightsholders such joint science efforts, ecosystem considerations, and planning what the fishery should look like with regards to gear, access, management options when it does reopen. Such critical issues are pushed aside and delayed when TAC discussion dominates each year.

We are appreciative of the efforts the department has made to work with the United States to align our management approaches and improve conditions for rebuilding this stock. Canada has been the leader in reducing our catches, which has ultimately resulted in the United States gradually reducing their catches, to below 100t, essentially just bycatch. Canada should remain a leader in this regard and set the example with cautious decision making and prioritising the rebuilding of this stock.

Finally, **the department should explore options to provide support to those members of the fishing industry across Atlantic Canada and Quebec who are impacted by this closure.** It is imperative that the government steps in with direct support to the people affected, particularly small-scale fishers and plant workers who are often impacted the most.

We look forward to a timely announcement this season following a precautionary approach and we thank you for considering our input.

Sincerely,



Holly Isnor,
Marine Campaign Coordinator
Ecology Action Centre, Kijipuktuk (Halifax)

CC:

Adam Burns, Assistant Deputy Minister, Assistant Deputy Minister Fisheries and Harbour Management, Department of Fisheries and Oceans
Todd Williams, Chair, Atlantic Mackerel Advisory Committee

