



March 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](mailto:min@dfo-mpo.gc.ca)

**Re: The Ecology Action Centre recommendations on Unit 1 Redfish Management for 2024.**

As Atlantic Canada's oldest environmental organisation, the Ecology Action Centre supports sustainable fisheries and thriving coastal communities in our region. We appreciate this opportunity to provide our comments and recommendations on the upcoming fishing season.

Redfish, a slow growing, long-lived deepwater fish, has seen a recent and unexpected population boom in Atlantic Canada, leading to an increased interest in re-opening this fishery in the Gulf of St. Lawrence. While this boom in the population provides an opportunity for industry, predictions show that the abundance will diminish again in a decade.

The opening of the Unit 1 Redfish fishery in 2024 marks a much-anticipated opportunity for many in our region, and we understand the motivation to open this fishery given the current high biomass of redfish in the Gulf of Saint Lawrence. However, there are significant challenges and limitations to overcome if this fishery is to be an economically viable endeavour which does not increase risk to the many other fisheries in the region, and the many species and ecosystems of the Gulf.

The allocations presented during January's Ministerial announcement do not prioritise access for inshore fleets, indigenous fishers or provide direct benefits to coastal community fisheries first, but instead offer the largest share of the quota to offshore vessels. We are disappointed that the allocations do not prioritise community adjacency and access for inshore fishers who can benefit most.

We urge you to consider past management failures that overexploited stocks in the Gulf of St Lawrence and be realistic about the extent to which we can rely on this fishery in the long term. Spending significant resources to develop robust international markets, building new offshore boats, and increasing capacity in processing for a decade long fishery will only create precedent and pressure to maintain the fishery well past the point of sustainability.

**We call on you to ensure that this limited-time fishery has a future proofed 21<sup>st</sup> century management plan, if the fishery opens at all.** The management plan needs to ensure responsible harvesting of redfish within the limits of the stock and the mitigation of bycatch of other species, while maximising economic opportunities for inshore, community fishers in our region. It will be critical for the department to increase monitoring and research to accurately measure rates, location, and species of bycatch and to prioritize innovation in catch methods and management to minimize the bycatch in this fishery.

**TAC Recommendation**

**We recommend TAC of 25,000t for the 2024 season.** Setting a lower TAC of 25,000t will lower the risk of exceeding bycatch limits and lessen resources needed to meet 100% observer or electronic monitoring coverage.

### **Bycatch Mitigation**

One of the main hurdles for successfully prosecuting this fishery will be bycatch. Several species-at-risk that would be caught in this fishery are in the critical zone with very small capacity for further removals without compromising the stocks. **We expect to see clear and precautionary bycatch limits, specifically, for cod, white hake, and Atlantic halibut.**

We are also very concerned with the opening of this fishery given the largely unknown status of Acadian redfish (*S. fasciatus*). Because the two species of redfish are visually difficult to distinguish, especially in the context of active fishing, it is possible that the deepwater redfish (*S. mentella*) fishery will result in Acadian redfish removals that will be difficult to monitor and manage as a sustainable level for the stock.

It will be incredibly important for the fishery and the department to ensure that all effective means of mitigating bycatch of these species, are implemented, which include **gear modifications, move-on protocols, spatial closures, depth restrictions and seasonal closures.**

### **Rebuilding Plan Commitments**

**We strongly urge government to continue moving forward with the implementation of the rebuilding plans for all species that may interact with this new fishery.** Delaying rebuilding plan implementation or adjusting bycatch limits to make this limited-time and low-value fishery more viable would be a massive step back for the management and recovery of these species. This would also undermine the intent of these rebuilding plans and the work that the department has undertaken to right the wrongs of past management decisions.

### **Observer Coverage**

**We recommend 100% at-sea observation for the 2024 season to ensure that reliable, real-time data is captured, and shut-downs occur before bycatch limits are exceeded.** This must come with a clear plan from the department for ensuring resources are available to meet this requirement. Increasing capacity in Atlantic Canadian fisheries, and demand on the observer program in a time when many fisheries are not meeting their targets is extremely concerning.

As highlighted in the [auditor general report on fisheries monitoring in Canada](#), our fisheries monitoring program in Canada is currently failing to ensure that we have robust and reliable catch data from our fisheries. Adding electronic monitoring as a tool in the future can help to alleviate some of the pressure on the at-sea observer program. **We recommend the government provide financial support for those small boats in the industry to aid in the transition towards improved monitoring.**

We thank you for your consideration and hope to see a timely announcement with clear next steps for this fishery including a fulsome, precautionary management plan.

Sincerely,



Holly Isnor,  
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CC:

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