

October 2, 2025

The Honourable Joanne Thompson, P.C., M.P.
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RE: Herring TAC increase for Southwest Nova/Bay of Fundy

Dear Minister Thompson and Regional Director General Wentzell,

We are writing to express our concern and put forward questions regarding the process and rationale for the mid-season total allowable catch (TAC) increase for the Southwest Nova/Bay of Fundy (SWNS/BoF) herring stock announced on September 9, 2025. The decision to increase the TAC by 25 per cent occurred without consultation, scientific rationale, and against the department's own commitment at the Spring 2025 SFHAC meeting that the four-year 2024 decision stood.

Consultation, transparency, and predictability

Prior to the September 9, 2025 announcement of an increase of the TAC for the SWNS/BoF herring fishery for 2025 and 2026, members of SFHAC were told that the four-year management decision would not be revisited each year and that recommendations on the TAC were not requested (Personal communication, Timothy Hayman, April 16, 2025). Oceans North participated in the CSAS meeting on June 25, 2025 where the Terms of Reference stated – and meeting participations were told – that the science discussed was not meant to inform a decision this year. Following the CSAS meeting, all SFHAC members received preliminary outcomes from the Chair of the advisory, with no indication that the preliminary results would be inform a change in management for Fall 2025.

This decision follows many months of the Herring Science Council refusing to share acoustic survey results from 2024 – results which were successfully released to the department after public lobbying by other members of the SFHAC including signatories to this letter.¹ In fact, the CSAS meeting from June was originally scheduled to take place months earlier but was delayed due the data being withheld.

The Integrated Fisheries Management Plan (IFMP) for this stock states that when the stock is below the Limit Reference Point (LRP), as was confirmed in the July 25th science response, “the harvest strategy is to be results driven. Rebuilding to a level above the LRP

¹ Ecology Action Centre, Oceana Canada, Oceans North. “RE: Scotia Fundy Herring Advisory Committee Process and Planning”. November 13, 2024.

should be achieved in a reasonable timeframe (6 to 8 years – 1.5 to 2 generations) with a high degree of probability. The TAC should be set with a very low risk of biomass decline.”²

We hope that this makes clear why this decision has come as such a shock to us, particularly for a stock which has been in the Critical Zone since 2017 (~8 years).

Science credibility

The SWNS/BoF herring stock benefits from the stock status being derived from a three-year average of the spawning stock biomass (SSB) across major spawning areas. Averaging the stock status over three years is explicitly conducted so that no single data point can be used to justify a change in management. Regardless, the increase in the SSB shows that the stock remains in the critical zone, both in 2024 and over the 3-year average. Below are key points from the science update, showing no significant change in the health of this stock in 2024:

- The mean acoustic index has varied above or below the LRP from 2005 to 2017.
- The stock has been in the critical zone since 2018 based on the three-year average acoustic index indicator.
- The minor increase in the SSB is not uniform across spawning grounds, rather showing the continued shift in primary SSB production from German Bank (68% below the long-term average) to Scots Bay (90% above the long-term average).
- Minor spawning grounds (i.e., Trinity Ledge, Spectacle Buoy) have fluctuated without trends, while Seal Island has increased between 2023 and 2024.

The stock status update also included the following statement:

“This update provides no catch advice for this stock. A harvest decision was made in 2024 to set the TAC at 16,000 t annually for years 2024–2028. For this interim year update, Fisheries Management requested an update of indicators with the most recent data and an evaluation of exceptional circumstances. **Exceptional circumstances did not occur.** Catch advice from the previous framework could be utilized.”³ Emphasis added.

As stated in the Precautionary Approach (PA) Framework, and now codified in the *Fisheries Act*, when a stock is in the critical zone, management actions must promote stock growth and removals from all sources must be kept to the lowest possible level. Further the policy states that there should be no tolerance for preventable decline. Increasing the quota by 25 per cent based on a science response not intended to provide catch advice raises into question the department’s commitment to the PA Framework and the stock status updates completed by DFO Science.

Questions:

We are deeply concerned by the way this decision was made and we ask that the department address the following questions:

1. What information does the department have to show that this quota increase will help achieve rebuilding the stock above the LRP 6 to 8 years after the stock has fallen into the critical zone?

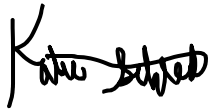
² Fisheries and Oceans Canada. 2021. Atlantic herring in the Maritimes Region. Integrated fisheries management plan. [Atlantic herring in the Maritimes Region](#)

³ DFO. 2025. 4VWX Herring (*Clupea harengus*) Stock Status Update to 2024. DFO Can. Sci. Advis. Sec. Sci. Resp. 2025/026.

2. What is the percent increase in SSB from 2023 to 2024 that is cited in the decision to increase the TAC this year?
3. Is the new Memorandum of Understanding with the Herring Science Council dependent on the fishing industry receiving a quota of 20,000 tonnes as industry members have stated in previous ultimatums at SFHAC meetings?
4. If the 2026 science response shows an increase or decline in the spawning stock biomass, will the Minister adjust the management measure under the same justification used for the mid-season adjustment in 2025?

We thank the department for considering our requests and look forward to taking part in the continued SFHAC process.

Sincerely,



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Oceans North



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