
Ecology Action Centre Comments to the Atlantic Large Pelagics Advisory Committee 2026

The Ecology Action Centre (EAC) appreciates the opportunity to provide additional input on the productive discussions at the March 2026 Atlantic Large Pelagics Advisory Committee (ALPAC) meeting. The EAC supports thriving coastal communities and sustainable fisheries in our region. The EAC has engaged on large pelagic fishery policy and research for more than a decade at the both the domestic and international levels through active participation at ALPAC and as advisors to Canada's delegation at ICCAT.

Although we shared our views on several discussion topics during the advisory committee meeting, we would like to take this opportunity to expand upon those comments and to address each of the proposals tabled this year.

Swordfish Harpoon Quota Society proposals on fleet-to-fleet transfers

We support the proposal to permit fleet-to-fleet transfers from the swordfish harpoon fleet mid-season. Allowing transfers to occur earlier in the season and fleets to sell their quota, means that harpoon fishers could mitigate some of the financial strain that has come from years of low catches.

South West Nova Tuna Association proposal on Ex-sector landing limits

We support the proposal to remove landing limits for this fleet while fishing ex-sector. While, we acknowledge the market-related concerns mentioned during the meeting, it is our view that fishers understand markets and benefit from being strategic with landings to ensure a stable and profitable market. Controlling the market is not the role of the fisheries management regulator. Removing landing limits may also result in climate benefits from reducing the trip frequency and distance. Having such a small trip limit in place for a directed species forces fishers to make multiple trips, increasing cost and emissions, even if higher catches are possible.

Nova Scotia Swordfishermen's Association proposals on: Atlantic Bluefin Tuna bycatch allocation, carry-forward and Mexican transfer

For many years, the pelagic longline fleet for swordfish and other tunas have requested to increase their bycatch allocation of Bluefin Tuna citing operational needs to undertake their fishery. In our view, the solution to this problem is not to increase the fleets bycatch allocation of Bluefin Tuna, but to implement means to mitigate and decrease bycatch. For this fleet, we should be prioritising robust monitoring, incentivising bycatch reduction and increasing enforcement and compliance action. Bycatch management for non-selective gear types like pelagic longline should be a process of on-going improvement in both mitigation measures and reporting. For the EAC, when considering these three proposals, at the centre is the fact that Bluefin Tuna is considered a bycatch species in the pelagic longline fishery. It should fall under the same policies as other bycatch species across Canadian fisheries. Not only this, but any new allocation given to this bycatch fishery would be coming from Canada's limited quota and directed fleets.

Our position is that there are further steps needed to reduce bycatch and discarding of Bluefin Tuna in the pelagic longline fishery and that these should be taken prior to any increase in allocation. The department needs to disincentivize bycatch of Bluefin Tuna and other species by this fleet. Specifically,

- Proposal 1: We do not support an 8,096t increase in Bluefin Tuna bycatch allocation for this fleet. The overall Canadian increase in allocation more than makes up for the changes to the ICCAT tables for bycatch allocation. We also note that just because other ICCAT countries treat Bluefin Tuna bycatch allocations in a particular way does not mean that this works or should be implemented in the Canadian context.
- Proposal 2: We do not support the proposal for the pelagic longline fleet to be allocated up to 10% of all of Canada's Bluefin Tuna carry-forward. This carry forward should be prioritized for directed fisheries before being considered for a bycatch fishery. We could support the suggestion made at the advisory committee for the pelagic longline fleet to be able to carry forward 10% of any unused quota they purchased during the season. This carry forward should be considered only for the following season (not cumulative over several years) and should have a total weight cap. The potential impact of this on directed fleet access to quota should be further understood before a decision is taken.
- Proposal 3: We do not support the inclusion of bycatch fisheries in the Mexican transfer. It was established for directed fleets and should stay as such. We recommend that the fleet and the department seriously consider the status of the fleet as directed or non-directed if it were to be included in the Collaborative Agreement.

Increased bycatch mitigation measures in the pelagic longline fishery

The Department's Policy on Managing Bycatch and associated [guidance document](#) outlines several strategies that should be in place for the pelagic longline fishery, which has already been identified as a high-risk fishery for bycatch. Annex 2 notes that bycatch measures should be: *binding and enforceable, measurable, and fully implemented*. Section 3.1 details the requirements and appropriate nature of data collection and monitoring.

In the case of Bluefin Tuna in the pelagic longline fishery, this policy is not currently being met. Monitoring objectives are not set in line with global best practices, and the targets that are in place are not being met.

Annex 2 of the policy also highlights the use of alternative fishing gear to improve selectivity. Now that the pelagic longline fleet is licence for buoy gear use and this gear seems effective for reducing Bluefin Tuna bycatch, we suggest maximizing incentives for use of this gear.

In lieu of increasing Bluefin Tuna bycatch allocations for this fleet, we suggest that licence conditions state that once the fleet has landed their Bluefin Tuna quota, plus any transfers they purchased, vessels would only be allowed to haul out using buoy gear. Should the fleet purchase more Bluefin during the season, they could continue to fish longline. This would require more frequent reporting

and tracking by resource management but would result in better bycatch management of Bluefin Tuna.

One of the benefits of using buoy gear for bycatch mitigation is that it is a tended gear type. Increasing the number of sets and lines for each fisher would also increase the response time for fishers to tend the gear, and the time bycatch remain on the line. We realise that there are AIS buoys tracking sets but remain concerned that allowing unlimited sets may result in longer time between tending and increased bycatch mortality. We suggest an analysis of tending time and consideration of a reasonable set limit for next season.

The EAC also continues to recommend mortality limits for all species caught in Canadian fisheries. These should be hard limits accompanied by fishery shutdowns when these limits are reached, even if there is still available target species' quota. In the case of the pelagic longline fleet, the ITQ system allows for quota transfers to manage bycatch flexibly throughout the season. We must reduce intentional dead discards and incentivizes bycatch avoidance.

Fisheries catch monitoring and electronic monitoring

We were pleased to see that there are several electronic video monitoring projects happening across large pelagic fisheries in Eastern Canada and that efforts to bridge the gap left by a now long-term shortage of at-sea observers are moving forward. Fisheries catch monitoring is essential for science, enforcement and compliance, improving business performance of fleets, and verifying standards. Electronic monitoring (EM) has been at the forefront of discussions on how to address shortcomings of the system and increase reliable catch data in Canada. **We also note that the Fishery Monitoring Policy risk assessment results for Bluefin Tuna showed a clear gap in the monitoring system for pelagic longline. This now requires the department to improve monitoring and data collection.**

There is interest in improving at-sea observer programs and developing EVM further, but resources are needed to prevent this work from stalling. We note the [Green Budget Coalition](#), representing over 25 of Canada's leading environmental organizations, continues to recommend this critical investment be included in the next federal budget (see pg. 40).

Relating specifically to the projects discussed at the advisory committee, we recognise that electronic monitoring systems take time to get right and require an investment of time and money to implement and maintain. We are concerned that the trail cameras used in the Gulf region are being phased out and there is no plan yet to replace this effort, either by the Department or industry. A modest investment could replace these cameras and allow for the continued capture of this data.

At the same time, the pelagic longline fleet has completed their first year of testing with what was described as less than positive results. We note that expecting a system to work perfectly at the outset is unrealistic. A successful EM project requires trial and error and persistence. In year one of this project there seemed to be quite broad objectives, some of which were beyond the scope of what is realistic to expect EM system to capture at such a preliminary stage. While each species may not yet be identifiable and measured at this stage, important effort, impact and compliance information

is being compiled that does allow for comparison with logbooks and flagging video times for further scrutiny by a human enforcement officer. Research has also shown that EM on board can result in behaviour changes and increased compliance regardless of the specificity of the catch data that is captured.

Rod and reel gear trials

The EAC once again thanks the department for the continued support on our shared work to trial rod and reel gear with the swordfish harpoon fleet in Nova Scotia. Catches continue to be extremely low despite the resource being abundant. We will continue to support efforts to keep this clean, storied fishery alive and economically viable and to keep a sustainable seafood product on the Canadian market. **We are hopeful that continued gear trials will help to answer several key research questions and demonstrate promise for other licence holders as well as potential new buyers.**

Canadian delegation to ICCAT

We would like to reiterate our request that the Minister commit adequate funding to send a larger delegation representing Canada to the ICCAT annual meeting in November of this year. Recently reduced delegation size resulted in limited capacity for negotiators to meaningfully engage in the wide breadth of topics relevant to sustainable management, international treaty compliance, and commercial quota. Having regional managers, scientists, and experts who work on these fisheries year-round attend these negotiations in person is necessary to best represent Canada's interest on the international stage. Ensuring Canada plays a strong role on the world stage to champion sustainable fisheries management and ecosystem consideration will be increasingly important as the global geo-political dynamics shift.

Closing

We thank you for taking the time to consider our input for Atlantic Canadian large pelagic fisheries this year and look forward to continued discussions on these issues. We are supportive of advancing Canada's large pelagic fisheries as leaders in fisheries management, monitoring, adaptation and bycatch reduction into the future.

Sincerely,
Holly Isnor



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