

April 27th, 2022

Hon. Joyce Murray, P.C., M.P.
Minister of Fisheries, Oceans and the Canadian Coast Guard
200 Kent Street, Ottawa, ON
Sent by email

Re: Scotia-Fundy Herring Management Strategy Evaluation (MSE) management procedure recommendations

Dear Minister,

The Ecology Action Centre is Atlantic Canada's oldest and largest environmental organization, founded in 1971. We sit on the Scotia-Fundy Advisory Committee as well as multiple advisory committees for other forage fish stocks in Atlantic Canada and have been active participants throughout the MSE process.

We are writing to provide our recommendations on the candidate management procedures (CMPs) resulting from the MSE, as well as our general perspective on the process.

With regards to CMPs, for a stock in the Critical Zone such as Scotia-Fundy herring, ecological considerations must prevail and fishery removals should be kept to a minimum. Therefore, the hockey stick CMPs are the best option for faster rebuilding as they allocate a TAC of 0t until the stock is out of the Critical Zone: **"HS_PA_F11.8"** and **"HS_PA_F13.1a"**. However, we recognize that closing the fishery, even if only for a short period, can have drastic socio-economic consequences and might not be a preferable option. Therefore, CMPs that rebuild the stock above the Critical Zone while maintaining fishery open by having a constant relative harvest rates can be preferable: **"p3.5"**, **"p3.6a"**, and **"p3.7_20_80"**. **The Ecology Action Centre supports any of the CMPs mentioned above.**

We caution against the CMPs where relative harvest rate increases as stock abundance decreases as these MPs can be problematic if the stock abundance drops unexpectedly, and could further hinder rebuilding: "STEP1a", "STAB_14.5_10", and "Fix12.5".

More broadly speaking, we would also like to provide some general comments on the MSE process. The EAC has participated since this process began over three years ago. While multiple issues have been brought up by both organizers and participants, and in hindsight there are many things that could have been done better, we believe this process has been overall scientifically robust and the outcomes are in line with what is expected for a stock in a critical zone: rebuilding will unavoidably require significant reductions in catches.

This MSE process is particularly important as currently there is no stock assessment for Scotia-Fundy herring that can be used to assess the effect of different management scenarios. The MSE process also helps DFO achieve its commitment to adopt the Precautionary Approach by providing scientifically sound harvest control rules that encourage the rebuilding of this depleted stock.

Decisive management action is needed now to rebuild Scotia-Fundy herring and the MSE process is the best tool we have for this. Canada's Blue Economy can only thrive if abundance and biodiversity in our ocean are rebuilt.

Sincerely,



Sebastián Pardo, PhD
Sustainable Fisheries Coordinator

Cc:

Jeffrey Reader, Chair, Gulf Small Pelagics Advisory Committee
Adam Burns, Director General, Fisheries Resource Management
Doug Wentzell, Regional Director General, Maritimes Region