



Ecology Action Centre



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Dear Ms. Minogue,

Re: Comments on MSC Certification of the 3LN redfish fishery

The Ecology Action Centre is one of Atlantic Canada's largest and oldest conservation organization. Our marine program works at the local, regional, national and international levels to secure marine conservation outcomes. We have a long history of engaging on MSC certification, as well as with the Atlantic Canadian groundfish fleet. We are currently members of the Scotia-Fundy Groundfish Advisory Committee and we advocate for population rebuilding and stewardship of marine fish populations that are in decline. We are also founding members of SeaChoice, Canada's Sustainable Seafood program where we work with retail partners to improve their seafood purchasing practices. We are submitting our comments as the Ecology Action Centre as well as on behalf of SeaChoice.

Principle 1 issues:

Our main concern related to this fishery is the fact that 3LN redfish actually is comprised of two different redfish species, the Acadian Redfish (*Sebastes fasciatus*) and the Deepwater Redfish (*Sebastes mentella*). Both of these species have been assessed as Threatened by COSEWIC (COSEWIC 2010). We believe that further data, which distinguishes between the two species must be utilized in this fishery in order to assess the true impacts.

The two redfish species have not been regularly separated in fisheries statistics, in stock assessments, and in management plans. Catches are reported as "redfish," without any differentiation, and quotas are set for their combined catch. The most recent NAFO stock assessment was for a species complex "redfish" with no separation of trend data by species (NAFO SCR 14/006, 14/022). However, in its assessments, COSEWIC was able to determine trends for both species, using species specific data on abundance trends and distribution.

The abundance of redfish in 3LN has increased considerably since the COSEWIC assessment in 2010. However, the available data do not allow one to determine which species has increased, or if both have increased. Therefore it is critical to use delineate impacts on both species in order to gain a full understanding on the impacts of the fishery related to P1. If rebuilding is not occurring for both species, we do not believe the fishery should be certified.



We also urge the assessment team to carefully consider the 2010 COSEWIC assessment. While redfish are not currently listed under the Species at Risk Act, they are being considered at this moment. In addition, DFO has not challenged the scientific validity of the COSEWIC findings. We believe that MSC's failure to consider COSEWIC assessed species-at-risk as ETP species is a significant weakness within the system, and creates the potential for certified to negatively impact vulnerable species. Considering this fishery targets a species-at-risk, we encourage the assessment team to require the use of complete precautionary reference points (limit, target and upper) in this fishery, as well as additional tools to promote rebuilding, prior to certification.

Principle 2 issues:

Species at Risk

There are several SARA listed species that might be affected by this fishery; North Atlantic right whale, blue whale, leatherback turtle, northern wolfish, and spotted Wolfish. We request that the assessment team closely examine the fishery's impact on these species, and require strict protection and monitoring plans are already in place before certification proceeds.

In addition, there are several other species that have been assessed as Endangered or Threatened by COSEWIC but that have not been SARA listed that might be affected by this fishery:

- Atlantic cod
- American plaice
- thorny skate
- smooth skate
- winter skate
- white hake
- cusk

We request that the assessment team consider these primary bycatch species because of their vulnerable status, ensure that the fishery is not having adverse impacts on them, and that rebuilding strategies are being implemented.

Sensitive Benthic Habitat

Redfish tend to dwell in areas of structured habitat, where there are current breaks, which often overlaps with areas of sensitive benthic habitat with coral and sponge concentrations. These areas have been well mapped in the northwest Atlantic, both in Canadian and international waters (the Northwest Atlantic Fisheries Organization has identified these areas as “vulnerable marine ecosystems”). As bottom trawling has damaging impacts on this habitat, we request that the fishery disclose its fishing footprint, and develop a plan to protect know sensitive benthic areas, prior to certification. Work has been done to protect these areas in the NAFO Convention Area, and the Canadian government has a Sensitive Benthic Areas policy (adopted in 2009). Unfortunately there has been very limited implementation of the Sensitive Benthic Areas policy in Canadian waters and we are concerned that this fishery may damaging

sponges and corals in our waters. We hope that MSC will raise the bar regarding ecosystem considerations in this fishery, through conditions related to benthic habitat.

Thank you for the opportunity to provide input. Let us know if you require additional information.

Sincerely,



Catharine Grant
Marine Policy and Certification Coordinator