



# Ecology Action Centre

2705 Fern Lane · Halifax · Nova Scotia · Canada · B3K 4L3  
t: 902-429-2202 · f: 902-405-3716 · e: [info@ecologyaction.ca](mailto:info@ecologyaction.ca) · [www.ecologyaction.ca](http://www.ecologyaction.ca)

Ivan Mateo  
SAI Global Assurances Services  
3<sup>rd</sup> Floor, Block 3  
Quayside Business Park  
Millstreet, Dundalk, Co. Louth, Ireland

May 31<sup>st</sup>, 2016

Re: Canadian Atlantic Halibut 3<sup>rd</sup> Surveillance Audit  
Dear Mr Mateo,

Please accept the following letter as input to the 3<sup>rd</sup> surveillance audit of the Canadian Atlantic Halibut Fishery. We would like to bring some information to the attention of the surveillance team that we feel warrants review the last year's closing of conditions. Since stakeholders can only input before audit visits and cannot review the final audit reports before the surveillance is closed for the year, the only chance to raise questions on scoring changes and findings are one year later, at the opening of the new surveillance.

We would specifically like to bring to your attention information pertinent to conditions for White Hake. First, we would like to draw the attention of the assessment team to some citation issues with documents used in assessing progress on Conditions 1 and 2 in the 2<sup>nd</sup> surveillance audit. Secondly, the 2<sup>nd</sup> surveillance audit closed Conditions 1 and 2 for the longline and gillnet client boats. We disagree that the conditions related to White Hake 4VW should have been closed. Please see below for detailed information.

## **1) Documents referenced in the 2<sup>nd</sup> Audit Report**

The 2<sup>nd</sup> audit report states:

"A Recovery Potential Assessment (RPA) was completed and discussed at a DFO Zonal Peer Review meeting held in Moncton, NB in January 2015 (Guénette and Clark)." p28

The Guénette and Clark paper cited (Guénette, S. and D. Clark. 2015. *Recovery Potential for 4VW White Hake*. DFO. January 8, 2015) is cited in the audit report as the final RPA document. This is not the RPA, but rather only a paper considered at the meeting.

In fact, to date, the RPA has not yet been finalized or released by the DFO and is not yet available to stakeholders (pers comm. with Gerald Chaput, Coordinator, Center for Science Advice, Gulf Region, DFO, May 11, 2016). DFO Science has not released information about the RPA to those not at the peer review meeting. Industry stakeholders were not at the meeting.

Progress on Condition 1 and 2 reported for the 2<sup>nd</sup> Surveillance Audit erroneously relies on a “completed RPA” and discussion of causes of mortality and status in said RPA. The committee could not have officially adopted this as it is still under review. The reference points for White Hake proposed at the SFGAC are still proxies based on the DFO RV survey.

We request the surveillance team thoroughly review the documents on 4VW5XYc White Hake provided by the client last year against the milestones.

## **2) Premature closure of Conditions 1 and 2 for White Hake 4VW**

The proxy reference points currently being used by management to assess 4VW White Hake show that it is in the ‘critical zone’. This requires the client to have “a cohesive approach to fishing mortality including catch mitigation measures” by the second Milestone and “a strategy to promote recovery” of the species by the 3<sup>rd</sup> Milestone.

The condition for 4VW seems to have been closed through the adoption of a bycatch cap as a mitigation strategy and the combined score with White Hake 4X5Y, which is assessed in the cautious zone now.

This leads to an unfortunate premature closing of the conditions on 4VW, which still remain in the critical zone. A bycatch cap should not be considered a ‘cohesive’ approach as required by milestones Year 2. We would like to note, that catches fall below this cap at 81mt, 123mt, and 100mt in the last 3 seasons respectively. It has been suggested at the SFGAC meetings this discrepancy could encourage increased catch and is not precautionary.

The stock could benefit greatly from a proper strategy to promote recovery as required by milestone Year 4 if the condition remains open. Such a strategy is also required under DFO’s Precautionary Approach framework for depleted species.

We request that the assessment team reassess the progress of 4VW White Hake conditions based on the above information as it is still in the critical zone.

We would also like to note for non binding Recommendation 3 that the IFMP is still not publicly available on the website and this makes it difficult for stakeholders to engage with decision making processes.

We look forward to your response. Please don’t hesitate to contact our office with any questions.

Sincerely,



Shannon Arnold  
Marine Policy Coordinator  
Ecology Action Centre, Halifax