

Fisheries Resource  
Conservation Council

1234  
Conseil pour la conservation  
des ressources halieutiques

Ottawa, Canada  
K1A 0E6

FAXED  
8 8 9 9

↓  
to members  
33.

August 8, 1994

The Honourable Brian Tobin, P.C., M.P.  
Minister of Fisheries and Oceans  
House of Commons  
Ottawa, Ontario  
K1A 0A6

Dear Minister:

Section 4.5 of the Terms of Reference of the Fisheries Resource Conservation Council (FRCC) states

"The Council may also advise the Minister on the position to be taken by Canada with respect to straddling and transboundary stocks under the jurisdiction of international bodies such as the Northwest Atlantic Fisheries Organization (NAFO)".

The Fisheries Resource Conservation Council submitted its first report on NAFO managed stocks and other stocks in the Regulatory Area of interest to Canada in August 1993. That report recommended extending the moratorium on 2J3KL cod; implementing moratoria for 1994 on 3LNO American plaice, 3LNO yellowtail flounder, 3NO witch flounder and 3NO cod; finding a mechanism to limit catches of Greenland halibut in Subareas 2 and 3 to a maximum of 25,000 tonnes per year; and implementing a proper conservation and management regime for 3M shrimp.

The Council is very supportive of the positions taken by Canada at the meeting of the NAFO Fisheries Commission in September 1993 and at the special meeting in March 1994 which have resulted in NAFO decisions for 1994 for moratoria on fishing the two cod stocks and the three flatfish stocks referenced above.

.../2

Canada

Similarly, the Council is supportive of your decisions and statements of intention with respect to conservation of the Greenland halibut stock following the FRCC's report to you of June 20, 1994 and the recent Report of the NAFO Scientific Council.

Thus, in these respects, the situation has changed quite dramatically and positively since our NAFO advice of one year ago. Nevertheless, the recent NAFO Scientific Council Report continues to stress that many of these stocks are at or near all time low levels and that, in order for rebuilding to occur, year classes must be protected until they are mature.

It is therefore essential that Canada continue to be directed by its "conservation approach" to managing these fisheries in 1995. Consequently, the Fisheries Resource Conservation Council recommends that Canada's position at the upcoming NAFO meetings be to:

1. Continue the moratorium in 1995 for:
  - 2J3KL cod
  - 3LNO American plaice
  - 3LNO yellowtail flounder
  - 3NO witch flounder
  - 3NO cod
  - 3NO capelin
2. Address the concerns raised by the exploitation of immature year classes in the directed fisheries (American plaice, yellowtail flounder and cod) in the Regulatory Area by non-contracting parties, as well as the suspected high and increasing by-catches of American plaice taken in the Greenland halibut fishery by both contracting and non-contracting parties.
3. Find a mechanism to regulate Greenland halibut in the NAFO Regulatory Area at significantly reduced levels of fishing effort and catches.

This has been recommended by the NAFO Scientific Council and previously by the FRCC in both its August 1993 and June 1994 reports. It is the highest conservation priority.

The question is, what is an appropriate conservation fishing level for Subareas 2 and 3 in the absence of a detailed scientific assessment? The NAFO Scientific Council report provides various indications that the catch in 1995 should be lower (perhaps substantially lower) than 40,000 tonnes to halt the declining biomass trend. The FRCC, in its June 1994 report, recommended that Canada should strive to limit total catches (both inside and outside 200-miles) in Subareas 2 and 3 to 25,000 tonnes maximum per year, until scientific evidence is available to advise differently. We maintain that position for 1995.

Finally, it is recommended that Canada take the lead in working with other countries in designing and initiating the required scientific programs for this stock throughout its whole range.

4. Take the lead in proposing that NAFO immediately implement a cautious and conservation-oriented approach to managing the 3M shrimp fishery, including the limitation of fishing effort, and the minimization of discards of small redfish.
5. Take a responsible and conservation-oriented position in dealing with other fisheries which might be considered of lesser importance to Canada. For example, in dealing with the fisheries in 3M, it is recommended that Canada strongly support the NAFO Scientific Council's recommendations of a moratorium for 3M cod to allow re-building, limit the fishery for 3M American plaice to by-catch only, and institute a maximum catch of 20,000 tonnes for 3M redfish.

The Fisheries Resource Conservation Council is pleased to be able to offer this advice, and trusts that it will be of some benefit.

Yours sincerely,



Herbert M. Clarke  
Chairman