



March 26, 2021

Marc Gorelnik (Chair, Pacific Fishery Management Council)

RE: F7: Implementation of the 2021 Pacific Whiting Fishery Under the U.S./Canada Agreement

Dear Mr. Gorelnik:

Canada and the United States (U.S) have a longstanding and productive relationship in collaborative fisheries management, as exemplified by the *Agreement Between the Government of Canada and the Government of the United States of America on Pacific Hake/Whiting*. The offshore hake/whiting fishery is an important transboundary resource that is central to the social and economic sustainability of our respective fishing communities, including harvesters, processors, licence holders, and other stakeholders reliant on the fishery. While we have had some challenging conversations these past two years, both countries are committed to working together for the joint stewardship of the shared hake resource.

Over the past five years, the fishery has benefited from strong recruitment that has allowed for the largest harvests on record, in excess of 400,000 t, which is considerably above the long-term average catch of 239,919 t. Last year though neither Canada or United States fishers saw any abundance of young hake. We are now reaching a point where we need to take concerted action in order to ensure the long term sustainability of the fishery. This is borne out by the best available science, developed collaboratively under the Treaty process by the National Marine Fisheries Service, Fisheries and Oceans Canada, and external experts, that indicates the hake/whiting biomass has been declining since 2017. The median estimate of biomass in 2021 is 59 per cent of unfished biomass, and is projected to decline further over the next three years unless the harvest level is reduced to at least 180,000 t.

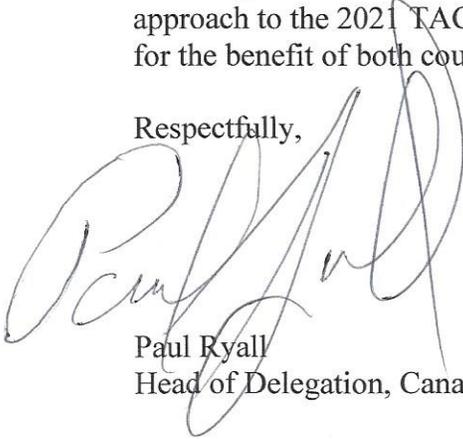
Were the hake/whiting commercial fishery to maintain its current historical high catch levels, there is a 47 per cent probability that the stock will fall below the reference level, requiring the application of the treaty's "40/10 adjustment" by the start of 2023. This adjustment would reduce the coast wide total allowable catch (TAC) on a straight-line basis from the 40 per cent level, such that the TAC would equal zero when the stock is at 10 per cent of its unfished level. Needless to say, these catch reductions would have significant economic implications to both American and Canadian fishing communities.

To manage these risks, Canada has consistently advocated for more conservative catch limits to smooth the transitions between periods of high and low recruitment. The Canadian Joint Management Committee (JMC) appreciates that U.S. domestic catch sharing plans can create difficulties in attaining its full share of the TAC. However, it is our opinion that increasing the overall TAC, in order to offset these inefficiencies, is not in the best interest of conserving this shared resource now and into the future. While we were pleased that Canada and the U.S. were able to reach agreement that the coast wide catch should not exceed 380,000 t, Canada would much prefer a more precautionary coast wide catch.

In the absence of agreement at this year's JMC for a 2021 coast wide TAC, we would like to notify the Pacific Fishery Management Council that Canada's JMC is recommending that Fisheries and Oceans Canada establish a Canadian TAC of 104,480 t, which equates to a coast wide TAC of 400,000 t, had an agreement been reached. This is the same TAC limit that Canada established in 2020, and is a 30 per cent reduction from the TAC adopted by the Council in 2020 (575,000 t).

Noting our shared commitment to the stewardship of this important resource, the Canadian JMC encourages the Council to take into consideration Canada's concerns, and apply a precautionary approach to the 2021 TAC that supports the long term sustainability of the hake/whiting resource for the benefit of both countries.

Respectfully,

A handwritten signature in black ink, appearing to read 'Paul Ryall', is written over the typed name and title.

Paul Ryall
Head of Delegation, Canada

Cc: Mark Waddell, Director General, Fisheries Policy, Fisheries and Oceans Canada
Cc: Phil Anderson (PFMC Member at Large, U.S. JMC member)
Cc: John DeVore (PFMC groundfish staff)