



## RE: Comments on the May 26, 2021 Proposed Rule for 2021-2022 Specifications for Atlantic Mackerel, Squid, and Butterfish Fisheries, NOAA- NMFS-2021-0048<sup>1</sup>

---

June 10, 2021

Samuel D. Rauch III  
Deputy Assistant Administrator for Regulatory Programs  
National Marine Fisheries Service, NOAA Fisheries 1315 East-West Highway  
Silver Spring, MD 20910

Dear Mr. Rauch,

Oceans North is a Canadian environmental non-governmental organization working on marine conservation in partnership with Indigenous and coastal communities. We appreciate the opportunity to comment on NOAA Fisheries' proposed 2021-2022 Atlantic mackerel specifications, as we have an interest in mackerel given the population is shared between Canada and the United States. We have been advocating for sustainable management of Atlantic mackerel for years through Fisheries and Oceans Canada (DFO)'s scientific and advisory processes. It is disappointing to witness the continued decline of this population to the lowest levels on record. In response to the latest scientific assessment from DFO and given Canada's decision to reduce its 2021 TAC by 50%,<sup>2</sup> we urge NOAA to follow suit and reduce allowable catches to a similar level.

The results of the most recent DFO mackerel stock assessment are incredibly concerning, but they are not surprising considering management decisions by Canada and the U.S. to date. The 2015-year class once offered a glimmer of hope for some recovery following decades-long decline. However, due largely to high exploitation rates, that year class was only 7% of the spawning stock biomass in 2020.<sup>3</sup> The assessment also highlights that the spawning stock biomass is at the lowest ever observed (at 58% of the limit reference point) and has been in or near the Critical Zone, according to Canadian policy, for over 10 years. The stock assessment also revealed that there are almost no (<1 %) fish over 5 years, exploitation is focused on fish aged 2-5 years, and that there have been no notable recruitment events in recent years.<sup>4</sup>

As in the U.S., mackerel are important part of the economy in Atlantic Canada as a commercial, bait and recreational fishery. Additionally, mackerel support the broader ecosystem as a forage

---

<sup>1</sup> [Fisheries of the Northeastern United States: Atlantic Mackerel, Squid, and Butterfish Fisheries: Specifications, National Oceanic and Atmospheric Administration, Federal Register, Docket No. 210517-0107, May 26, 2021](#)

<sup>2</sup> [Minister Jordan announces Atlantic mackerel quota for 2021](#)

<sup>3</sup> [Spawning-age mackerel at record lows in Atlantic Canada](#)

<sup>4</sup> DFO science presentations from the Atlantic Mackerel Advisory Committee meeting, March 30, 2021

fish. However, past quotas have not allowed the stock to rebuild and have jeopardized future revenues. A 2020 cost-benefit analysis revealed that minimizing fishing could lead to benefits estimated at over \$54 million, with a 12.9% return on the “investment” in stock rebuilding.<sup>5</sup>

In light of the new Canadian assessment and catch reduction, we therefore urge NOAA Fisheries, MAFMC and its Scientific and Statistical Committee to reduce the 2021 annual catch for the benefit of our shared mackerel stocks, coastal livelihoods and ecosystem.

Sincerely,

Katie Schleit  
Senior Fisheries Advisor  
Oceans North

---

<sup>5</sup> [The Jig is Up: Millions at stake in DFO’s failed actions to rebuild the Atlantic mackerel stock.](#)