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January 18, 2024

William McGillivray  
Regional Director General  
Department of Fisheries and Oceans Canada  
Northwest Atlantic Fisheries Centre  
80 East White Hills Road  
St. John's, NL A1A 5J7

*Re: Response to the Potential Addition of Lumpfish to the List of Wildlife Species at Risk Under the Species at Risk Act (SARA)*

Mr. McGillivray,

Lumpfish was assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) in 2017 as threatened and the Government of Canada has recently undertaken consultations on whether lumpfish should be added to the List of Wildlife Species at Risk. If lumpfish is listed in SARA, a directed fishery would be prohibited, and this would severely impact fish harvesters and plant workers in Newfoundland and Labrador. From our review of the consultation material and discussion with our members who are actively engaged in the lumpfish fishery, we do not believe that a listing is warranted.

According to the *Draft Socio-Economic Analysis* prepared by DFO, an average of 40 enterprises participated annually in the directed lumpfish fishery between 2013 and 2022, peaking in 2020 with 73 enterprises. Over that period, around 70 percent of landings were in NAFO division 4R and 20 percent in 3K, with 3L and 3Ps making up the remainder. There were on average 24 4R-based enterprises with annual lumpfish landings, which accounted for 13 percent of the total landed value for all species harvested by these enterprises. These 4R enterprises do not have access to snow crab, and some do not have access to lobster, which makes lumpfish an important source of revenue for their enterprise. This lumpfish revenue is not easily replaced, particularly given the closure of Northern Gulf cod in 2022 which has since extended into 2023.

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In 3K, an average of 13 enterprises had lumpfish landings annually between 2013 and 2022, which accounted for around three percent of their total landed value. Even though the number of enterprises with landings is relatively low, lumpfish is still an important fishery for those participants. In years prior to the scope of this Socio-Economic Analysis, more enterprises participated in the lumpfish fishery, and it made up a larger portion of the enterprises' annual revenue. There could be a time where harvesters need to rely upon the lumpfish fishery again, since the ecosystem, markets and therefore the fisheries it supports are constantly changing.

It is important to note that each of those enterprises participating in the fishery provides for more than just themselves. Benefits from the lumpfish fishery flow not only to the enterprise owner, but also an additional one or two crewmembers, off-loaders and others working on the wharf, truck drivers, and the plant workers who brine-cure the roe. The lumpfish fishery supports more than just individuals, it supports communities.

In the 2017 *COSEWIC Assessment and Status Report* (the Report), lumpfish were assessed as threatened based on data that showed severe declines in abundance as indicated in bottom trawl surveys over approximately two decades, as well as sharp declines in commercial landings since 2005. It is noted that there has been a decline in abundance of about 58 percent in bottom trawl surveys conducted off Southern Newfoundland over a period of 19-20 years, but that abundance appears to have remained stable across other parts of the range such as the northern Gulf of St. Lawrence. The Report goes on to say that in other areas, lumpfish are only caught infrequently in the bottom trawl surveys.

However, this decline is limited to only one portion of the species distribution. While the report indicates that the decline is in 3P, it is not clear how trends from the different bottom trawl surveys in 3Pn are summarized to arrive at this conclusion. The Report disregards stable trends (4R).

The Report notes that lumpfish are semi-pelagic and spend a greater portion of their time near the bottom in the winter months. The rest of the time, females lay their eggs in inshore waters, young of the year inhabit near-surface waters, and at all stages lumpfish are observed adhering to stones, lobster pots, seaweed, or other objects. These behaviors and seasonal distribution trends mean that lumpfish are poorly sampled by bottom trawl RV surveys.

The severe declines in abundance as indicated in bottom trawl surveys is from an area (southern Newfoundland) where the fishery is limited (it is not clear if this is 3P or 3Ps) yet has remained stable in the area that support many harvesters (the northern Gulf of St. Lawrence – 4R). It appears that the Report has extrapolated survey results from one area and are being used as an indicator for all eastern Canadian waters. Further, it seems as though a bottom trawl may not be the best gear to catch lumpfish, since they are semi-pelagic. The 3Ps bottom trawl survey, which is where the decline is noted, is done in the spring, whereas it is winter months when lumpfish are most likely to be found on the bottom. Further, lumpfish appear to spend a significant portion of their lifecycle in inshore waters, which is not included in the bottom trawl survey. As the Report

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was completed in 2017, the assessment includes survey data up to 2015, meaning that there is a nine-year gap between the most recent available data and this consultation period.

While the Report does include mention of pre-1995 data, these lower abundance estimates are not considered in the assessment of species status. Abundance estimates from 2GHJ3KLNO surveys indicate stables abundance estimates at a much lower level. Similarly, there are few mature fish in the 1990-1995 data from 4RST, earlier in the time series. By focusing on declines from peak abundance estimates, the Report disregards data from the full timeseries for the species. Moreover, by focusing on the data collected since 1995, the approach taken in the Report is contrary to efforts by the Department to consider the longest time series possible in the estimation of reference points and establishing Precautionary Approach Frameworks.

According to the Report, the other factor contributing to the threatened assessment for lumpfish is the sharp decline in commercial landings. While we cannot comment on the actual decline, since landings are not released due to the privacy threshold not being met, landings of a species can decline for many reasons. In the case of lumpfish, at least two other high-value species are fished during the same season: snow crab and lobster. As can be seen in the table below, the price per pound of snow crab and lobster has generally been increasing, while the price of lumpfish has been in decline. As is noted on page 8 of the departments *Assessment of Lumpfish (Cyclopterus lumpus) in the Gulf of St. Lawrence (3Pn, 4RS) in 2015*, the “lumpfish fishery is strongly influenced by market conditions, and annual landings vary according to demand and prices. If prices are low, some fishers may focus on other fisheries until prices recover.”

Year	Lumpfish	Snow crab	Lobster
2023	\$ 1.88	\$ 2.27	\$ 7.54
2022	\$ 1.42	\$ 6.87	\$ 7.87
2021	\$ 0.30	\$ 7.37	\$ 7.70
2020	\$ 3.24	\$ 3.45	\$ 4.45
2019	\$ 4.51	\$ 5.21	\$ 6.34
2018	\$ 1.88	\$ 4.82	\$ 4.82
2017	\$ 1.39	\$ 4.39	\$ 6.95
2016		\$ 2.98	\$ 5.73
2015		\$ 2.47	\$ 5.42
2014		\$ 2.34	\$ 3.92
2013		\$ 1.97	\$ 3.61
2012		\$ 1.95	\$ 4.04
2011	\$ 3.77	\$ 2.15	\$ 4.19
2010	\$ 4.16	\$ 1.35	
2009	\$ 3.99		
2008	\$ 3.75		

Snow crab price: 2013 - 2023 taken from DFO Fish Landings and Landed Value; 2010 - 2013 FFAW Fish Prices (premium crab price)

Lobster price: 2013 - 2023 taken from DFO Fish Landings and Landed Value

Lumpfish price is the final price (initial price plus rebate)

While a relatively small number of harvesters are currently fishing lumpfish, those that are have been doing so for many years. One White Bay harvester reports that from 2019 to 2022, his catch tripled while using the same number of nets (20-22 nets). In 2023, his landings were down, only because the extraordinary ice conditions caused him to lose half of the lumpfish season. Last year, this harvester noticed a particularly good size distribution, with an abundance of medium, large, and extra-large lumpfish. This harvester sets his nets in the same location every year because of its proximity to his homeport and lobster grounds and the season has generally remained the same. This harvester also reported seeing lump roe stuck on buoys for the first time since the 1980s and seeing small lumpfish (approximately one inch long) stuck to buoys and the wharf, again for the first time since the 1980s.

A harvester from Bonavista Bay reported a similar increase in catch rates – generally tripling over the last four years and seeing buoys with as many as 30 one-inch lumpfish attached. This harvester also reported lumpfish catches being the same at the end of the season as at the beginning.

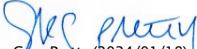
In conclusion, the decline in recorded abundance is just from one area yet is being extrapolated onto all of Eastern Canada. The gear type used to document this decline is not well-suited to catching lumpfish, a semi-pelagic species; the location of the trawl survey (i.e., offshore areas) only captures a part of the lumpfish lifecycle; and the most recent survey data used in the assessment is from 2015. The decline in commercial landings can be attributed to the increase in price of other species that are fished at the same time, particularly snow crab and lobster.

We believe listing lumpfish as a Species at Risk is not currently warranted. The listing would be based on data from a single portion of the species distribution and is simply not justified by the data presented in the Report. A listing would mean a closure and that would be devastating for the dozens of license holders, crewmembers, plant workers, and others that rely on the lumpfish fishery. There are other actions the department can take that would provide information on the health of the stock, including logbooks to record valuable catch per unit effort data, seasonality, distribution, etc. Closing this fishery means that data cannot be collected.

We thank the department for taking the time to meet with staff and fish harvesters during the consultation period and trust our position will be duly considered in your recommendation to Minister Lebouther.

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Sincerely,

  
Signed by Greg Pretty (2024/01/18) | Verify  
with [verifio.com](https://verifio.com) or Adobe Reader.



Greg Pretty  
President, FFAW-Unifor

CC: Honourable Gudie Hutchings, MP for Long Range Mountains  
Honourable Seamus O'Regan, MP for St. John's South-Mount Pearl  
MP Churence Rogers, MP for Bonavista-Burin-Trinity  
MP Ken McDonald, MP for Avalon  
MP Yvonne Jones, MP for Labrador  
MP Joanne Thompson, MP for St. John's East  
MP Clifford Small, MP for Coast of Bays—Central—Notre Dame  
Honourable Dr. Andrew Furey, Premier of Newfoundland and Labrador  
Honourable Elvis Loveless, Minister of Fisheries, Forestry, and Agriculture NL  
Helen Griffiths, Regional Manager, Fisheries and Oceans Canada  
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