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To: Marisa Keefe
Fisheries and Oceans Canada
401 Burrard Street, Vancouver, BC
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January 21st, 2022

Re: Pacific Wild Alliance (PWA) Recommendations for 2021/2022 Pacific herring IFMP

Dear Marisa Keefe,

Pacific Wild Alliance (PWA) is submitting the following as per the request for input pertaining to the 2021/2022 Integrated Fishery Management Plan for Pacific herring. PWA is driven by the goal of protecting the marine and terrestrial wildlife on the B.C. coast. We believe in an ecosystem-based management approach to fisheries that includes proper monitoring, enumeration, open public engagement, and community-led initiatives to help preserve, restore, and protect B.C.'s natural resources. In particular, we support the legal and constitutional rights of First Nations in managing herring populations in their respective territories. We appreciate the opportunity to comment on the draft Pacific herring IFMP for 2021/2022 and would like to remain engaged in consultation moving forward.

Firstly, we would like to extend our thanks for the recent management decision, announcing that the commercial herring quote for the 2021/2022 season was to be cut in half with a maximum total allowable catch of 7,850 tons in the Strait of Georgia. We're relieved that the federal government is finally recognizing the concerns of First Nations, coastal communities, and a wide array of British Columbians who advocate for a return to healthy herring populations on the B.C. coast.

While this decision to reduce the fishery from a 20% to 10% total allowable catch is an excellent step in the right direction, we hope that we can continue to discuss approaches in ecosystem-based management in all major commercial fisheries and agree upon the difference between migratory and resident herring populations.

Below, we outline suggestions for this year's IFMP. We continue to advocate for a rapid transition to ecosystem-based management of Pacific herring and, by association, all fisheries. We also believe, alongside many other advocates, that a longer-term commercial fisheries moratorium is necessary for herring stocks to recover. This would give herring an opportunity for recovery, rather than waiting for their inevitable collapse before taking action.

Pacific Wild Alliance recommends the following amendments to the 2021/2022 Pacific herring IFMP and in consideration for future management plans:

1. Move towards Ecosystem-Based Management (EBM)

The new Sustainable Fisheries Framework is outlined in the IFMP and includes policies for adopting EBM approaches. This is a step in the right direction. As a community with a shared objective (to ensure biodiversity and healthy oceans for future generations) we must not dig a deeper hole by allowing commercial fishing to proceed as usual while surrounding stocks remain depleted. While we speculate, we still do not fully understand Pacific herring's value as a foundational species in the marine ecosystem and its correlation to the endangered status of Chinook salmon and Southern Resident Killer Whales. EBM allows for a holistic analysis of the herring fishery in relation to the ecosystem, rather than simply at a species level.

2. Identify migratory and resident herring populations in the IFMP

The spatial distribution of herring stocks is still not recognized in the Pacific herring management plan. The IFMP assigns stocks to the area in which they are fished – however, there is sufficient evidence to suggest that many regions are home to both local and migratory populations of herring. As such, they cannot be managed as the same unit. The commercial fishery has been known to open prior to the arrival of migratory stocks, depleting the local and extremely vulnerable populations. This crucial information has remained under-researched and unmentioned in management plans. DFO should be aware that management mitigations must be prepared for both migratory and non-migratory populations of herring. We encourage DFO to review the work of the Juanes lab at the University of Victoria, in particular the work investigating the ecosystem impacts of migratory herring on Chinook salmon by Jessica Qualley and Wesley Greentree.

3. Conduct catch-per-unit-effort analysis that is publicly available

In fisheries biology, the catch-per-unit-effort (CPUE) is an indirect measure of the abundance of a target species. Changes in the CPUE are used to signify changes to the target species' true abundance. If effort in the Pacific herring fishery remains stagnant while the catch is decreasing, this would demonstrate a collapse in the stock and should be publicly shared.

There has been very little change in the number of licenses distributed, number of vessels, and fishing effort in the commercial herring fishery while the stocks move closer to collapse. Additionally, the number of licenses issued has not decreased while the quota has continued to decrease. Last year, the commercial landings of Pacific herring totaled nearly 16,000 tons, not even fulfilling the 18,001 ton quota that was set in the 2020/2021 IFMP. This suggests that despite the fishing effort, there were insufficient amounts of fish to fulfill the quota.

4. Outline a more consistent plan to integrate TEK into management

The 2021/2022 herring IFMP mentions the need to integrate Traditional Ecological Knowledge (TEK) and Indigenous Knowledge (IK) into DFO management plans. Consulting with First Nations is a necessary step in Fisheries Reconciliation and ensuring access to fishing rights. Having this mentioned in the IFMP is promising, however, direct action and steps in accomplishing this integration should be outlined and incorporated into the IFMP.

5. Prioritize SOK fisheries over other harvesting methods

A point of concern in the continued opening of commercial fisheries in the Strait of Georgia is that while seiners and gillnetters are still allowed to operate, Spawn-on-Kelp (SOK) operations are not. SOK fisheries are a sustainable method of harvesting and should not be suffering while gillnetters and seiners continue to profit. Additionally, SOK fisheries are not yielding sufficient herring eggs in the population collapse. The fact that this sustainable fishery cannot yield enough catch should be evidence enough that the remaining gear methods should not be in operation.

We must take responsibility for the state of Pacific herring. We must uphold our promises to First Nations, advocate for our ecosystems, and support the continued sustainable livelihoods of fishermen. We applaud the positive steps you have made toward true conservation of this foundational species and urge you not to lose momentum now.

Thank you for engaging on this issue and for finally acknowledging the need for Pacific herring conservation. We look forward to your response to our recommendations.

Sincerely,

Emmalai Page
Marine Research and Science
Pacific Wild Alliance