



**Bowen Island
Conservancy**

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December 1, 2020

Rebecca Reid
Regional Director General
Fisheries and Oceans Canada
Suite 200-401 Burrard Street
Vancouver, BC V6C 3S4

Re: Pacific Herring Fishery 2020/2021

Dear Ms. Reid

This letter is sent on behalf of the Bowen Island Conservancy. The Conservancy is a non-profit society, having an objective of the protection and enhancement of the ecological health of Bowen Island and the surrounding marine environment. The society has over 100 active members and enjoys broad support in the Bowen Island community.

Bowen Island is surrounded by the waters of Howe Sound, which were heavily impacted by industrial activity and resource development throughout the 20th century. In recent years, however, Howe sound has experienced a substantial recovery. Marine life, while undoubtedly not back to pre-development levels, has been recovering from historic lows. This recovery is visible in the frequent observations of whales and other marine mammals that have been absent for many years. More careful observation has shown that life further down the marine food chain has also been recovering. In particular, and most significant for the purpose of this letter, substantial amounts of herring and herring spawn have been observed by scientists and “citizen scientists” in recent years.

It is not surprising to see a correlation between the increase in marine mammal sightings and the increase in herring. It is widely recognized that herring provide a critical link in the marine food web between plankton and larger fish, marine mammals and birds. Thus, we believe that it is fundamentally important for herring stocks to be protected in order to maintain the ongoing ecological recovery in Howe sound.

On the other hand, herring stocks on the B.C. coast have been declining in recent years, a decline which appears to be strongly correlated with the ongoing commercial fishery. Information available from your department shows that four of the five management areas on the BC coast have been closed to commercial fishing due to low stocks, and the remaining area, Georgia Strait, has experienced significant stock declines in recent years. Despite this, your department is approving very large herring fisheries in Georgia Strait this fall, for “food and bait” and in the new year, for herring roe.

In our view, continuation of the commercial fishery in the face of seriously declining stocks is a mistake, and we urge your department to reconsider, either eliminating or substantially reducing the commercial fishery. In this regard, we have been provided with a copy of the letter to your department from the Hornby Island Conservancy, a copy of which is attached to this letter. The Bowen Island Conservancy fully endorses the submission of the Hornby Conservancy in their letter.

We also understand that your department may consider opening a commercial herring fishery in Howe Sound this year. Such a decision would be a setback to the ecological recovery now underway, and we are adamantly opposed to any commercial fisheries in Howe Sound under the circumstances.

We are seeking your assurance that there will be no commercial herring fishery in Howe Sound for the 2020–21 year.

We look forward to your reply at your earliest convenience.

Yours truly



John Rich
Director, Bowen Island Conservancy

Cc:

Hon. Bernadette Jordan, Ministry of Fisheries, Oceans, and the Canadian Coast Guard
Terry Beech, MP, Parliamentary Secretary to Minister Fisheries, Oceans and Canadian Coast Guard
Patrick Weiler, MP West Vancouver - Sunshine Coast
Jordan Sturdy, MLA West Vancouver – Sea to Sky
Jonn Matsen, Squamish Streamkeepers Society
Ruth Simons, Future of Howe Sound Society
Tracey Saxby, My Sea to Sky
Peter Scholefield, Gambier Island Conservancy
Editor, Bowen Island Undercurrent
Anton van Walravren, Concerned Citizens Bowen
Tim Pardee, Bowen Island Fish and Wildlife Club
Hilary Butler, Bowen Rotary Club

Attachment: Nov 13, 2020 Letter from Conservancy Hornby Island to Ms. Victoria Postlethwaite, DFO

Attachment



November 13, 2020

Ms. Victoria Postlethwaite
Regional Herring Officer / Agent Régional du Hareng
Fisheries and Aquaculture Management / Gestion des pêches et de l'aquaculture
Fisheries and Oceans Canada / Pêches et Océans Canada
200-401 Burrard St
Vancouver, BC
V6C 3S4

Re: Pacific Herring Fishery 2020/2021

Dear Ms. Postlethwaite,

We are writing to add our voices to the call by First Nations, including the Tsartlip, Tsawout, and Tseycum nations, to bring a halt to all commercial herring fisheries on the south coast of Vancouver Island including North and South Gulf Islands. Conservancy Hornby Island, academics, and these First Nations believe that continuation of the current fishery will lead to imminent collapse of the Pacific Herring population, and a violation of the Douglas Treaty rights of these nations to continue to fish in their traditional territories (see <https://vancouver.sun.com/news/first-nations-alliance-forming-against-dfo-herring-fishery-plans>).

In June 2020, CHI commissioned a review from Dr. John Neilson, a former research scientist with the Department of Fisheries and Oceans (30 years) on the scientific basis for the protection of Pacific Herring in the waters surrounding Hornby Island. The following are among the key conclusions of the report:

- **Spawning biomass in four of the five Pacific Stock assessment regions (SARs) are depleted relative to their historic highs** and are close to their limit reference points of 0.3 SB0 25 (30% of unfished spawning biomass)
- Early in these data, spawning was broadly documented throughout the eastern Strait of Georgia from the southern tip of Vancouver Island to Quadra Island. In contrast, the distribution of spawning in 2019 was spatially truncated, and occurred only from Cape Lazo to off Nanaimo. **The waters around Hornby and Denman Islands are at the centre of the remaining areas of active spawning.** These results contrast with the archaeological record which provide persistent evidence of a large number of spawning sites throughout the Salish Sea.
- Locations around Hornby and Denman Islands represent many of the most important spawning areas for herring in the Strait of Georgia biogeographical zone ... **an MPA that protected spawners from fishing mortality could protect a significant fraction of the overall spawning within the Strait of Georgia SAR.**

The Neilson report emphasizes that the last remaining herring spawn will follow the downward trend of the other historically abundant spawning populations, particularly with the added pressures of a rapidly changing oceanic environment, rising temperatures, acidity, competition from other species, and ongoing fishing.

A recent study by the University of British Columbia (Ocean and Coastal Management, September 2020) has shown that temporarily stopping fishing of major commercial species such as herring would lead to **economic gains of up to 10 times above the status quo** after 30 years. The study considered six Canadian fish stocks — Pacific and Atlantic herring, Atlantic cod, Atlantic redfish, west coast Vancouver Island chinook and Vancouver Island yelloweye rockfish. The study demonstrated that in the case of herring, **closing a fishery would result in higher economic gains than setting low-catch limits**, as after initial losses fishers can resume harvesting at higher levels when the stocks rebound than they could if the fishery was left open to a low catch. The Pacific

herring fishery showed significant gains in even the least optimistic economic scenarios, as costs associated with fishing for herring are already extremely high (see <https://www.miragenews.com/q-a-rebuilding-depleted-canadian-fish-stocks-is-good-business/>).

The DFO acknowledges that in the last 4 years the herring population fell from 129,000 tons to a predicted 58,000 tons in 2020, and that the returning stocks comprised smaller fish and more juveniles. In 2017 the Fishery generated 216 full time equivalent jobs, and in 2019 lease values of licenses were near zero. With these returns the cost of closing the fishery for stock recovery is unlikely to be prohibitive (see Cashion, 2019 <https://pacificwild.org/the-economic-value-of-pacific-herring-in-the-strait-of-georgia/>).

For those of us who are concerned about the remaining herring in the Salish Sea, as well as the livelihoods of the fishers that rely on herring and other commercially important declining species, the science and solutions are clearly articulated in these recent recommendations. Continuing to shepherd the herring fishery along a path of slow decline will likely lead to the demise of the fishery, as well as the cultural and economic life that this fishery has supported for generations.

Pacific herring is the basis for the food web that supports the salmon, orcas and numerous other mammals, seabirds and other creatures who, with us, call this place home. Along with the 153,000 people who have signed an online petition, we offer our full support to the First Nations that have called for a moratorium on the commercial herring fishery and urge you to consider these recommendations for the long-term protection and recovery of the Pacific Herring.

Yours respectfully,



Grant Scott, Conservancy Hornby Island

Cc:

Hon. Bernadette Jordan, Ministry of Fisheries, Oceans, and the Canadian Coast Guard
MP Gord Johns, NDP Fisheries Critic
Rebecca Reid, DFO Regional Director General
James Meldrum, DFO
Don Tom, Chief, Tsartlip First Nation, WSÁNEĆ Leadership Council
Nicholas Claxton, Chief, Tsawout First Nation, WSÁNEĆ Leadership Council
Tanya Jimmy, Chief, Tseycum First Nation, WSÁNEĆ Leadership Council
Eric Pelkey, Hereditary Chief of Tsawout of the WSÁNEĆ First Nation
Justin Fritz, WSÁNEĆ Leadership Council
Premier John Horgan
MLA Josie Osborne
MLA Lana Popham
MLA Adam Olsen
Peter Luckham, Chair, Islands Trust Council
Clare Frater, Islands Trust
Lisa Wilcox, Islands Trust
Misty MacDuffee, Raincoast Conservation Foundation
Scott Wallace, David Suzuki Foundation
Aaron Hill, Watershed Watch Salmon Society
Karen Wristen, Living Oceans