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November 6, 2021

The Honourable Joyce Murray
Minister of Fisheries, Oceans and the Canadian Coast Guard
By email: joyce.murray@parl.gc.ca

Dear Madam Minister,

RE: 2021-22 Fishing Plans for Pacific Herring

Please accept these comments on behalf of the Bowen Island Conservancy respecting the draft Plans for the Pacific Herring 2021-22 Food and Bait Fishery and Special Use Fishery.

The Bowen Island Conservancy is a non-profit society, having as an objective the protection and enhancement of the ecological health of Bowen Island and the surrounding marine environment. We are aware that herring provide a critical link in the marine food web and that healthy populations are important to the ecology of Howe Sound.

The fundamental position of the Conservancy is that a moratorium should be placed on the commercial Herring fishery in Georgia Strait until such time as stocks recover to healthy levels throughout the area, including Howe Sound. In our view, healthy levels should be interpreted having regard to past abundance of herring in Howe Sound.

Indigenous peoples' traditional knowledge establishes that herring were abundant in Howe Sound prior to European contact. At first contact, Captain Vancouver purchased herring from Squamish people in Howe Sound. Herring remained abundant in the waters around Bowen Island in the last century, in the living memory of many Bowen Islanders, including observation of spawning in Snug Cove and Deep Bay.

Regrettably, this former abundance has been lost. However, in recent years recovery of marine life in Howe Sound has begun and the return of herring is part of that recovery.

In particular, we note that in recent years herring have returned to spawn in the waters of upper Howe Sound, Gambier Island, and the Gibsons area. We are hopeful that this recovery may extend to the waters adjacent to Bowen Island. In our view it is vital that this recovery not be disturbed by commercial fishing in the adjacent waters of the Salish Sea.

In our review of the draft Plans, we have found nothing that addresses our concerns, but rather a fishing plan that has no regard for potential consequences to herring stocks in Howe Sound, and in fact puts those stocks at risk.

Our particular concern in this regard, is that the "Food and Bait" and "Special Use" fisheries Plans target approximately 3000 tons of herring stocks, the spawning destination of which is unknown. Thus, stocks of herring destined to spawn in Howe Sound could be substantially diminished or wiped out by these fisheries being conducted in Georgia Strait. Although the IFMP purports to adopt the precautionary approach to management, the plan includes neither acknowledgement nor risk assessment of the potential impact to herring stocks in Howe Sound.

We note that our concern about the potential impact of these fisheries on Howe Sound stocks is equally applicable

to many other locations in the Salish Sea, which are equally not considered in the Plans. It appears that historical abundance and minor spawning areas are not considered in DFO modelling and thus impacts on these areas are not even considered. This makes a mockery of your department's assertions that the precautionary principle is being applied.

On a more general level, we concur with the views of many scientists, dozens of environmental groups and conservancies and thousands of citizens who recommend a lower harvest rate and a true application of the precautionary principle throughout the planning process.

In our view, the IFMP is essentially a fishing plan which does not address the environmental, social and broader economic issues which should be considered in deciding whether this fishery should proceed.

Finally, we question the sincerity of your Department in purporting to consider the broader environmental and social impact of the herring fishery. We observe that the lack of publicity provided by your Department respecting these Plans, the short timeframe for a response, and the proximity of the comment period to the intended start of the Fishery, makes it highly unlikely that substantial modifications will be made in response to public concerns. Nevertheless, there is still time to reconsider these Plans, especially in consideration of the potential substantial negative consequences which have not been investigated by your Department.

We request that no Food and Bait, nor Special Use Fisheries be permitted in the Strait of Georgia, until such time as your department has determined, in conformity with the precautionary principle, that herring stocks destined for Howe Sound will not be affected.

Yours truly,



John Rich
Director
Bowen Island Conservancy

Cc:

Joyce Williams, Squamish Nation
Eric Pelkey Wic'kinem, WSANEC Nation
Patrick Weiler, MP West Vancouver - Sunshine Coast – Sea to Sky Country
Jordan Sturdy, MLA West Vancouver – Sea to Sky
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