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

Dear Madam Minister,

This letter is sent on behalf of the Bowen Island Conservancy, commenting on the proposed commercial Herring Fishery in Georgia Strait 2021–22, as described in the draft IFMP. Our comments are further to those contained in our letter of November 6, 2021, a copy of which is attached.

We wish to commend you for your decision to reduce the targeted commercial herring harvest in the Strait of Georgia from 20% to 10% of projected biomass. This is a step in the right direction, however for reasons which are set out below, it is our view that there should be no commercial herring harvest this year.

#### HISTORICAL ABUNDANCE

Archeology and oral history clearly establish that herring was a principal food for indigenous people throughout the BC coast for millennia.

Significant use of herring by indigenous people was noted by Europeans at first contact. Captain Cook arrived at Nootka sound in the spring of 1778. He purchased large quantities of Herring from Nuu-Chah-Nulth people and observed them using fish traps to harvest large schools of the fish. In June 1791, Captain Vancouver purchased Herring from Squamish people in Howe Sound.

Indigenous knowledge held by First Nations throughout the BC coast establishes that herring were plentiful and available year-round for their communities until relatively recent times.

Early BC settlers describe herring spawn covering beaches stretching for miles at various parts of the coast.

Publications of your department record extremely large harvests of herring throughout the first half of the 20th century. Specific numbers, referred to in the current IFMP, include harvest of over 200,000 tons per year for several years in the early 1960s. The IFMP notes that this led to a collapse of stocks and the suspension of the fishery for several years. It is also noteworthy, but not the subject of comment in the IFMP, that a biomass of many hundreds of thousands of tons of herring would be required to enable catches of over 200,000 tons per year for several successive years.

The foregoing establishes that until recent times herring were plentiful throughout the coast and throughout the year. It also establishes that the biomass of Herring was vastly greater than what it is today. We observe that the total biomass this year estimated in the IFMP is approximately the amount of herring which was caught annually for several years in the 1960s.

However, although the IFMP makes some reference to the foregoing, this information plays no part in the analysis put forward to justify fishing at this time. Instead, the IFMP falls victim to the shifting baseline syndrome, planning on a foundation of recent observations of a seriously depleted resource, while ignoring significant relevant information.

#### PRECAUTIONARY PRINCIPLE

Your department claims to have adopted the precautionary principle in managing Fisheries, and the IFMP purports to apply this principle. However, the way in which the principle is applied by the IFMP is of no value from a conservation perspective. The “precaution” recognized by the IFMP is to meet an artificial target which appears to be derived from observations of herring quantity and distribution within the last 30 or 40 years.

The assumptions underlying this artificial target have no regard for resident herring stocks, nor for differentiation among migratory stocks which may occur within any of the five designated areas on the coast.

Nor does the precautionary analysis address the common sense issue that there must be something deficient in a strategy which has resulted in the closure of four out of five areas on the BC coast. The apocryphal definition of insanity, attributed to Einstein, comes to mind: “repeating the same action and expecting a different result....”.

Of specific concern to the Bowen Island Conservancy is that the IFMP, contemplates a significant harvest in the “food and bait” fishery without any precautionary analysis, citing no research, and without regard to the potential that herring schooling in the Strait of Georgia may be destined for Howe Sound.

The inadequacy of the asserted precautionary approach is compounded by provisions in the IFMP that industry, rather than fishery managers are to decide how much of the established quota is to be harvested in the Food and Bait fishery.

In conclusion, we ask that you recognize the deficiencies in planning objectives as described in the IFMP, and cancel or substantially reduce fisheries until progress is made towards the re-establishment of the historical abundance and distribution of herring stocks.

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  
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Ruth Simons, Howe Sound Biosphere Initiative Society  
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