

January 5, 2023

Via Email: DFO.Minister-Ministre.MPO@dfo-mpo.gc.ca

The Honourable Joyce Murray
Minister of Fisheries, Oceans and the Canadian Coast Guard
Minister's Office
200 Kent Street
Station 15N100
Ottawa, ON K1A 0E6

Dear Madam Minister:

Re: 2022-2023 Fishing Plans for Pacific Herring

Please accept these comments on behalf of the Bowen Island Conservancy respecting your department's plans for fishing herring this year.

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.

We have written in previous years, pointing out that your department's plans, set out in Annual IFMPs, purport to recognize historical abundance, Indigenous knowledge, and the Precautionary Principle, but in fact have little regard for these matters. Having reviewed the 2022-23 draft IFMP, we see that little has changed. Accordingly, we wish to reassert our concerns.

Historical Abundance

In our view, the restoration of historical abundance of herring ought to be an objective of herring management. Unfortunately, the planning approach set out in the IFMP is based on merely meeting a probability of maintaining a level of abundance substantially below historical levels – effectively accepting that herring abundance is gone forever.

We note there is significant evidence of 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 historical abundance, 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

The 2022-23 IFMP purports to have adopted and applied the precautionary principle in managing Fisheries. 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 in the IFMP 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.

Further, recent scientific analysis conducted by your own department establishes a number of issues which establish the necessity of a true precautionary approach:

- Research conducted by your department concludes that “the interplay of food supply and predation impacts on herring survival and production is complex and not readily predictable.” (IFMP, s. 2.2)
- The 20% harvest rate that was considered sustainable has been found not to be sustainable (IFMP, s. 2.5.2)
- Research not cited in the IFMP compares the situation of pacific herring with the north Atlantic groundfish, which are expected to decline to extirpation (CSAS Research Document 2018/009, authored by DFO Science, Nanaimo)

Food and Bait Fishery

Of particular interest to Bowen Island and Howe Sound is the current Food and Bait Fishery in Area 14, including the East Coast of Gabriola. It cannot be ignored because the sub-stock herring of Bowen Island and Howe Sound could well be feeding just across the Strait and therefore harvested by the Food and Bait Seiners. That fishery is documented by the IFMP 2023 as having destroyed the stocks of the Southern Gulf Island, Ganges and the East Coast of Valdes and Galiano Islands.

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 IFMP. 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.

Conclusion

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.

In conclusion, we ask that you recognize the deficiencies in planning objectives adopted in the IFMP, and cancel or substantially reduce fisheries until progress is made towards 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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Jonn Matsen, Squamish Streamkeepers Society
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