

December 1, 2023

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

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

Dear Madam Minister:

Re: 2023-2024 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 and the Strait of Georgia.

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 and the adjacent waters of the Strait of Georgia.

Public Consultation

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 2023-24 draft IFMP, we see that little has changed. As with previous years, the current plan seeks to justify continued fishing with little regard to conservation and no regard to the restoration of historical abundance.

Historical Abundance and Restoration of Stocks

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, characterized in the plan as "healthy" – effectively accepting that herring abundance is gone forever. Rebuilding stocks is only contemplated in the plan when stocks have declined to "critical" levels.

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 2023-24 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 only “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.

There are a number of obvious concerns which ought to invoke the precautionary principle:

- a substantial decline of herring stocks coastwide;
- the acknowledged scientific uncertainty regarding herring behaviour;
- the potential risk to recovering stocks, such as recovery of herring spawn in Howe Sound in recent years;
- the potential effect of the fishery on resident stocks or differentiated migratory stocks.

However, none of these risk factors are seriously analyzed in the IFMP.

Of particular concern to our conservancy is the continued food and bait fishery in the Strait of Georgia. The spawning destination of herring caught in the food and bait fishery is unknown. While it is possible that the stocks may be the same as those later to be captured in the roe herring fishery, it is also possible that they are stocks which, if not harvested, would spawn elsewhere. That uncertainty presents a clear risk to stocks which may be recovering in other areas, such as Howe Sound. It is a clear and compelling reason to invoke the precautionary principle and refrain from conducting any food and bait fishery.

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.

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 our view, a fundamental shift is required, toward a plan that prioritizes rebuilding and recovery of herring stocks recognizing the value of herring to the ecosystem as well as to the fisheries.

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
Patrick Weiler, MP West Vancouver - Sunshine Coast – Sea to Sky Country
Jordan Sturdy, MLA West Vancouver – Sea to Sky
Jonn Matsen, Squamish Streamkeepers Society
Carl Halvorson, Squamish Environment Society
Edith Tobe, Squamish River Watershed Society
Ruth Simons, Howe Sound Biosphere Initiative Society
Eoin Finn, My Sea to Sky
Peter Scholefield, Gambier Island Conservancy
Anton van Walravren, Concerned Citizens Bowen
Tim Pardee, Bowen Island Fish and Wildlife Club
Hilary Butler, Bowen Rotary Club
Cath Gray, Conservancy Hornby Island
Jim Meldrum, Department of Fisheries and Oceans
Marisa Keefe, Department of Fisheries and Oceans
Jim Shortreed