



Fisheries and Aquaculture

Pêches et Aquaculture



Office of the Minister
PO Box 2000, Charlottetown
Prince Edward Island
Canada C1A 7N8

Bureau du ministre
C.P. 2000, Charlottetown
Île-du-Prince-Édouard
Canada C1A 7N8

April 2, 2008

Fisheries Resource Conservation Council
Attention: Jean Guy d'Entremont, Chair
P.O. Box 2001, Station D
Ottawa, ON K1P 5W3

Fax: 613-998-1146

Dear Mr. d'Entremont:

First of all, thank you for inviting me to attend your consultation session in Summerside, Prince Edward Island. It is appreciated both by myself, my department, and the fishing industry in our province that the FRCC will be in Prince Edward Island to listen to the fishermen's concerns and issues on herring.

Unfortunately, I am unable to attend the Summerside consultation session, as I have a previous commitment. I want to welcome you here and offer you my department's perspective on the sustainability of the herring stocks in the southern Gulf of St. Lawrence.

As you are probably well aware, the herring resource along PEI's shoreline is very important to the fishing industry in this province. PEI has over 870 commercial herring licences and another 1,300 bait licences. The spring herring resource, fished primarily by western PEI fall lobster fishermen is an important bait fishery for the majority of over 1,000 spring lobster fishermen on PEI. The fall fishery is also an important component. Although the prices for roe have been low in recent years, landings have been relatively stable. The two fisheries combined amount to over 30 million pounds in landings with a value of \$3-4 million each year.

In the late 1990's, western PEI fishermen were having landings as high as 4,500 mt, but last year they only landed 850 mt. PEI fishermen have been concerned with the spring stock for over a decade. Together, we have both promoted the use of 'daily quotas' as a conservation measure for over 10 years, however this option has met with resistance.

We remain very concerned with concentrated effort on portions or components of the spring spawners. In fact, last season, the Island fishermen proposed further reductions in effort by instituting an exclusion zone near Cape Egmont to protect some spring spawners. Western PEI fishermen have also reduced the number and size of their nets, reduced the number of days fished, and also excluded night-time activity.

I acknowledge the conservation-minded attitudes and progressive thinking of Prince Edward Island herring fishermen. I am still very much concerned with the continued decrease in the biomass, with few signs of rebuilding. We must continue to protect each component of the spring spawners by spreading the effort over time and space. I encourage further implementation of protected areas, designed by the industry, to raise the probability of increasing annual recruitment.

I am also concerned with the amount of juvenile herring fished last fall, as well as the high percent of spring spawners in those catches. Both issues must be addressed to protect and enhance the chances for the stock to rebuild. Our fishers are concerned, as am I, on the long term impact that this will have on both herring stocks, but in particular the spring stock.

In 2005, the 25 fathom line was reinstated off the north shore of Prince Edward Island. Prince Edward Island herring fishermen believe, as do I, this is the critical piece in conservation of the spring and fall herring spawning stocks. This area is also closed to commercial inshore fishers in the spring.

More recently, there were fears when it was learned that DFO gave approval for the use of two mid-water trawlers in the Gulf of St. Lawrence. This decision certainly caught the inshore sector by surprise. Given the apparent lack of transparency and wide interpretation of "consultation" by DFO it becomes increasingly clearer as to why the reputation of DFO has been losing credibility in the eyes of inshore fishermen. It seems very perplexing that DFO would look to bring this technology to the Gulf of St. Lawrence while other jurisdictions are moving towards environmentally sustainable fisheries.

Southern Gulf fishermen are also concerned with the growing population of grey seals and their impact in the commercial fisheries. A recent study by DFO indicated that Grey seals consume about 4,000 tonnes of herring and about 60 tonnes of mackerel in the Southern Gulf annually. A concerted effort must be made by all parties to further assess and manage the grey seal population.

Page 3

Jean Guy d'Entremont

Apr. 2/08

With regards to further science work, my department, along with the Island's herring fishermen, has assisted in scientific research to aid in determining the status of the stocks. The industry collected acoustic data on individual spawning schools. They also collected indices of abundance of juveniles using experimental panels with varying mesh sizes to capture all age groups. In fact, my Department made a significant financial contribution to this project. However, I must express concern with the shrinking herring science budget. I acknowledge that as governments we must sometimes make difficult financial decisions, but we must be careful not to cut to a point that we can no longer collect data that allows us to make an informed decision on quotas.

Industry had developed a means to collect funds through daily overages to assist in herring science projects. However, due to the Laroque decision, DFO did not approve this in 2007. We must find a way to allow programs such as this to continue.

In the mid-1980's, PEI Department of Fisheries played an integral role in making slush-ice insulated containers the main component in increasing the quality and shelf life of herring. Carrying herring in slush-ice improves roe yield and should be made mandatory in the fall fishery, but implemented between the buyer and the harvester. This falls in line with the ocean-to-plate concept which DFO is promoting.

Any measure that will assist in raising the value of this fishery should be examined.

I hope I have added some meaningful input to the FRCC herring consultations. I look forward to reading your report on developing a strategic approach to the sustainable management of the herring stocks in Atlantic Canada. I must express some concern that the exercise "the long term sustainability of herring and mackerel" not be lost. I point out the financial contributions of the maritime provinces and the time and effort of all those involved. Too often processes are created and then left incomplete while another process is created.

Thank you again for coming to our province for consultations.

Sincerely,



Allan V. Campbell
Minister