

# **Fisheries Resource Conservation Council**

## **Consultation: *Preparation of a Sustainability Framework for Atlantic Herring***

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### **Brief Presented By:**

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## **Introduction:**

The PEI Fishermen's Association (PEIFA) is a certified fisheries organization which represents over 1300 core fishers on Prince Edward Island. There are approximately 850 herring gill net license holders and 1028 bait license holders. Although not all licenses are active, it indicates the important role that the herring fishery has contributed to the overall fishing activity on PEI. Landings on PEI were approximately 15,900 t, in 2005, 13,600 t in 2006 and 11,600 t in 2007. Landed value was approximately \$4,130,000 in 2005, declining to \$2,221,000 in 2006 and \$ 2,050,000 in 2007 reflecting market conditions. This value did not include value of bait for lobster and other fisheries, which is very considerable.

In response to the Fisheries Resource Conservation Council's request to the fishing industry to provide their views on major issues in the consultations we submit the following for the Council's consideration.

## **Scientific Priorities:**

It is our view that the funding required for Science is inadequate for proper stock assessment and management. Measures to improve the situation must be taken.

More emphasis is needed in determining the status of the spawning stock components in localized areas through continuation of the special acoustic surveys and recruitment sampling that has been conducted over the past several years in HFA 16 G and HFA 16 C/E. Prior to the Laroque case these "special projects" were funded through a waiver system that allowed proceeds from small overages incurred on trip limits to be allocated to a special fund for Science rather than being paid to fishers. These funds in addition to DFO's Fisheries Science Collaborative Project supported these projects. Other funding mechanisms or means of allocating quota to continue these projects need to be developed in collaboration with DFO. The objective of these projects is to develop a better picture of the localized spawning stock biomass so that a harvesting strategy can be used that will optimize fishing in synchronization with the biomass and meet sustainability objectives while not depleting the resource through too much effort at the wrong time. This approach has been suggested by DFO Science. (Ross Claytor and others). Better understanding of the homing of spawning components to localized beds such as Fishermen's Bank, Escuminac,

etc. should be supported by continuing the DNA research and trace element studies that Science has begun.

The information on the spring spawning and fall spawner components of the harvested fish is crucial to management of the fishery, particularly in light of the present critical situation for the spring spawners. Methods to provide a quicker analysis by Science of the samples should be undertaken so that industry will have information in a more timely fashion. More technical support should be acquired by DFO for collection and lab analysis during the fishery. This would apply to the spring and summer gill net fishery where it is argued that a high component of fall spawners is being caught in certain areas and this needs to be verified. Also where the large purse seiners are harvesting a high number of small fish in the fall fishery it needs to be determined if there is a high percentage of spring spawners in their catch so that corrective management measures can be taken during the fishery to prevent overexploitation of spring spawners.

Scientific methods to determine mortality from various harvesting methods need to be explored. Also the effects of climate change on water temperatures and likely impact on spawning and migratory behaviours need to be considered.

## **Fishing Methods/Practices:**

The PEI FA reiterates its position that fishing by the large purse seine fleet should be excluded in the inshore waters of less than 25 fathoms around PEI and phased out in inshore waters of the southern Gulf of St. Lawrence entirely. This opposition is based on (1) avoiding continued conflict between the inshore gill net fleet and the large purse seiners; (2) concern over the large number of small fish being targeted recently by the seiners and the negative impact that this may have on the spring spawner component in particular; (3) waste from mortality of small fish in released sets; (4) loss of spawning potential in taking of sexually immature small fish; (5) no daily limit on fishing effort which could have the effect of over exploitation of particular schools of herring and depletion of localized spawning components leading to a loss to local commercial inshore gill net fishery and bait fishery; (6) depletion of forage fish that are critical as a food source for Tuna, Groundfish and other species as well as an important bait for Lobster, Snow Crab and other fisheries; and (7) despite these concerns the seiner fleet is demanding reinstatement of access to exclusion areas, wants to fish for all markets including food, roe, fish meal and bait and is pressing to have the small fish protocol changed to decrease the minimum size. All would have very negative effects on the stocks in our view.

The inshore gill net fishery, on the other hand, is (1) selective for larger fish (4 years +) which allows for multiple spawning opportunities prior to harvest;

(2) inshore fishers have undertaken a number of measures to reduce the impact on spawning stocks including increased mesh size in nets, reduction in the number and depth of nets, closed spawning areas, reduced fishing effort through weekly and/or daily trip limits, reduced fishing days, etc.; (3) the gill net fishery is an essential component of the inshore fishery on PEI and provides considerable employment, when market conditions are favorable, for fishers and crew, dockside monitors, dockside handlers, processing plant employees, truckers, and a number of other spin off activities. The employment generated from the inshore gill net fishery is likely much higher in numbers than the employment generated from the large purse seine fleet.

The PEIFA is strongly opposed to the introduction of Mid Water trawling for herring and mackerel in the Gulf of St Lawrence and introduced a motion to ban this method of fishing at a recent Gulf Small Pelagics Advisory Committee in Moncton, NB. This motion was supported by all inshore groups from Nova Scotia, New Brunswick and Quebec as well as the UFFAWU of Newfoundland,

The reasons for opposing this type of fishing include: (1) the method of fishing is very non-selective with a high potential for negative impact on juvenile fish and by-catch of other species including some of concern under SARA and COSEWIC; (2) there is published information from New England seaboard, Gulf of Maine and the Scotia Fundy Region on the negative impact of mid-water trawling on inshore pelagic and groundfish stocks. The controversy has resulted in banning of mid water trawling in a number of areas with further bans being pursued by various inshore groups through the courts and fisheries management authorities; (3) It has been noted by a number of scientific authorities that the condition of migratory large pelagics such as Bluefin tuna that are migrating toward the North Atlantic and the Gulf of St. Lawrence is declining. It is considered that the fish are arriving in Canadian waters in poor condition, (very lean, low in fat) due to lack of forage species along their migratory route, such as mackerel and herring, that have been depleted by the mid-water trawlers in the inshore. This situation has a direct negative impact on the value of the Bluefin Tuna fishery in PEI.

## **Management:**

The management approach elaborated in the Sustainability Development Framework put forward by DFO may be a positive step. It recognizes the need to have fishers collaborate more closely with Science and Resource Management in developing sustainable management plans. This approach would also take into account more of the fishers traditional knowledge.

As noted previously, inshore fishers through dialogue and consultations have managed changes in TAC in both the spring and fall to address

conservation concerns and achieve management measures such as trip limits, effort reduction, quota sharing to distribute fishing effort, etc. Even though, in some cases, consensus was difficult, inshore fishers have made compromises and accepted some difficult management decisions. This type of flexibility has not been demonstrated by the large seiner fleet. Their demands for smaller fish allowances and increased access to closed areas which would result in increased fishing effort on the declining spring component are contrary to conservation and sound management principles. The seiner fleet representatives has recently walked out on the Gulf Small Pelagics Advisory Committee and it is important that they be brought back to the table for dialogue or DFO should consider sanctions or other measures such as rationalization of the southern Gulf seiner fleet.

### **Ecosystem Considerations:**

The role that herring play in the ecosystem as an important forage part of the food chain has been referred to previously. The interaction with other species, the predator/prey relationship and effects of changes in environmental and oceanographic conditions need to be further examined and understood by Science. Emphasis on the ecosystem approach and integrated management will require increased Science input.

The effects of increased predation on herring by the growing seal population also need to be determined. Fishers also report that the higher prevalence of seals is also causing damage to fishing gear and loss of fish as seals feed off the nets. Seals are also interfering with and damaging lobster traps as they go after bait herring in the traps. We would refer the Council to the recommendations in the recently distributed Seal Predation Working Group Report on groundfish.

### **Markets:**

From the fishers perspective the market situation is of key importance to their economic sustainability. Recent prices paid to fishers in the 8 to 10 cents per pound range are not sufficient to provide an economic return to them in light of the increasing costs they face for fuel, wages, gear etc. These prices are below some they received throughout the last decade and haven't changed significantly over the past 30 or more years. The explanation for this appears to be the dependence on a few specific markets such as the Japanese roe market which is unstable and declining and smoked herring primarily exported to the Caribbean Islands, a low priced market.

DFO has adopted an Ocean-to-Plate policy for the Atlantic fishery, i.e. fishing for the market rather than for quantity. While this is in its infancy, any success will require a concentrated international market analysis, development of new product lines, branding and improved quality at all levels. The harvesting sector must be part and parcel of each component of this process.

Inshore fishers in Prince Edward Island pride themselves on the quality of herring they deliver to the dock. Most harvesters utilize boxes, ice and slush to retain fish quality. However, no incentive is given for better quality which raises questions in our mind as to the approach taken by processors in dealing with the market place. The onus is on buyers and processors to demand quality product at the dock throughout the region and those who supply that quality should reap a better return for their efforts.

## **Conclusion:**

We thank the Council for this opportunity. We feel that we have only been able to touch the surface of issues confronting the Gulf herring fishery, but would emphasize the need to protect and enhance the inshore, gill net fishery for the benefit of both the stocks, themselves, and the general economic performance of the fishery to harvesters and the economy.

We look forward to hearing the views of fishermen who are here today and can speak to the practical day-to-day issues of the herring fishery.

Thank you.

Ed Frenette,  
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PEIFA.

