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To: Fisheries Resource Conservation Council
From: Women for Environmental Sustainability (WES)
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Summerside, PEI

Purpose: To provide the FRCC with WES's input into the long-term sustainability of the east coast herring fishery.

Background: Women for Environmental Sustainability (WES) is a grass-roots lobby group organized by mothers, fishers and concerned citizens. We formed in 2004 as a result of government's inaction on the herring seiner dispute off the north shore of PEI. Women organize WES but the membership, "Friends of WES," is made up of both men and women who are dedicated to keeping coastal communities sustainable. WES hosted a Winter Herring Conference in 2005 where fishers, academics, DFO scientists and concerned citizens discussed the role science played in the herring seiner dispute (see attached Conference Report).

Issue: The effect of purse seiners and mid-water trawler gear types on the sustainability of the herring fishery.

- The mobile fleet are extremely efficient at catching all fish in a school, which erodes the genetic diversity of the stock.
- The Department of Fisheries and Oceans (DFO) is unable to accurately assess the level of herring mortality in released purse seine sets.
- In 2007 fishing season, active purse seiners blatantly violated DFO's small fish protocol and brought in catches that had up to 49% small fish.

Recommendation: Purse seiners and mid-water trawlers are environmentally unsustainable fishing methods and must be prohibited from fishing in the Gulf of St. Lawrence.

Issue: The effect of DFO's lack of credibility, accountability, and transparency on the effective management of the herring fishery.

- Acknowledged in Surette Report, Long-Term Vision on Herring and Mackerel in the Southern Gulf Consultant's Report, and meetings with inshore fishers.
- More concerned with the management of the crisis than with management of the fishery – in 2005, spent more than \$100,000 on the Long Term Vision process, while only \$25,000 on scientific study (exclusive of salaries).
- DFO is combative and argumentative in GSPAC meetings – not using a collaborative approach to resolving committee issues large or small



- Not inclusive process – DFO is not consistent in their approach to community-based groups wishing to be involved in the management process – WES was involved in Long-Term Vision process but not acknowledged in latest report by Gilles Theriault or invited to most recent consultations
- Doesn't enforce their own rules – small fish protocol

Recommendations: An external, independent review of DFO management, policy and procedures must be commenced immediately. Government must interface better with the broad constituencies who depend on the fishery. DFO must stop pandering to elite corporate interests at the expense of the inshore fishery.

Issue: The effect of inaccurate, outdated and insufficient scientific information on the long-term sustainability of the herring fishery.

- Unreported catch – DFO's own internal documents indicate that DFO does not have an adequate model to accurately estimate Unreported Catch (DFO Internal audit of management control framework supporting statistical information on fisheries, 2007).
- DFO continues to cite outdated tagging studies as part of the scientific body of evidence for herring (4T Southern Gulf Herring presentation to FRCC)
- The model used by DFO to calculate the abundance factor of the Southern Gulf herring allows for an intense concentrated fishery on local spawning beds
- The model used to determine the abundance factor has numerous problems in estimating the biomass of the gulf fishery with reasonable accuracy – unreported catch and mortality, acoustic surveys.
- DFO doesn't take proper steps to ensure scientific protocol and information is properly disseminated to fishers – GSPAC meeting December, 2007 small fish protocol for seiners.

Recommendations: The federal government must commit more money to scientific understanding of herring. WES recommends that DFO research alternate models that will allow for and ensure a sustainable fishery. WES recommends that DFO immediately implement mandatory reporting for all herring bait fishers.

Also
in
long term
report.