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June 11<sup>th</sup>, 2020

Minister Jordan  
Minister of Fisheries, Oceans and the Canadian Coast Guard  
200 Kent Street, Ottawa, ON  
Sent by email:

**Re: Herring 4T (Fall Stock) TAC and Management Measures for 2020 season**

Dear Hon. Minister Jordan,

The Ecology Action Centre is Atlantic Canada's oldest and largest environmental organization, founded in 1971. We hold a seat on most fishery advisory committees in the Maritimes and Gulf regions and play an active role as civil society stakeholders. As a member of the Herring 4T Advisory Committee we are writing to offer management measure recommendations for the 2020 herring 4T (Gulf) fall spawning fishery. Herring and other forage fish species are especially critical to the survival of important food chains (including ours) and the overall marine biodiversity in our oceans. For this reason, all DFO management actions should *always* comply with their own Sustainable Fisheries and Precautionary Approach Frameworks. These policies are put in place to look after the long-term health of a sustainable fishery AND the rich biodiversity that is needed for a fishery to even exist. We do recognize that this is not always the case with herring management plans of the past and the failure to follow these policies is contributing to the continued depletion of these stocks.

The EAC is recommending the following management measures be implemented in this year's herring 4T fall spawning fishery:

- Use the new DFO-science that incorporates a more ecosystem-based approach, *along with* DFO's policies that promote a long-term sustainable fishery, to set the 2020 total allowable catch (TAC) level.
  - Based on the science advice and *Fisheries Act* policies that must be followed to hopefully avoid a complete collapse of this fish stock, EAC recommends a TAC no higher than 8,000t.
- Improve and make mandatory the reporting, monitoring and surveillance of the herring bait fishery. This is needed to better understand the true natural mortality (M) for DFO science and amount of fish being caught and taken out of the ocean.
- Eliminate other "reserves" or ways to catch more herring in 4T NAFO region. The TAC should be the *total* amount of herring taken out of 4T. Bait, roe, and other "reserves" need to be part of the TAC rather than above and beyond as is the current practice. There is simply not enough herring left to continue with this 'reserve' practice.
- Continue to fund and expand the excellent science being done in the Gulf region that uses a more ecosystem-based approach with a particular focus on better understanding all impacts to natural mortality (M); increased predation, zooplankton impacts from changing ocean temperatures, spawning and migratory changes, and impacts from microplastic ingestion.

- Ensure fishing mortality pressure is below 0.1 or 10%, reflecting the removal reference that is recommended under the provisional precautionary approach (PA) when a fish stock is in the cautious zone.

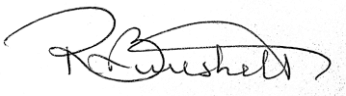
We recognize the enormous amount of work the DFO science team has done to better understand the state of this stock. We thank them for being one of the first to incorporate more ecosystem science data to better inform their models and impacts affecting this stock. EAC feels that the work to realize natural mortality (M) is critical, especially for a stock like this. Natural mortality is not a fixed number and needs to fluctuate as pressures change like prey abundance and increased predations from various marine mammals and higher order fish stocks like Bluefin Tuna.

EAC is very concerned with the health of the herring fall spawning stock. Of the 42 years this stock has been managed, the fishing effort (mortality) has exceeded the PA removal reference point 45% of the time. This is unacceptable and DFO management must ensure now more than ever that the marine biodiversity is looked after first. This long-term change will allow our fisheries to exist for years to come and mirror what a sustainable fishery should look like.

We commend management on the 100% hail in requirement for herring 4T spring bait fisheries and hope to see this measure put in place for the fall herring 4T stock. Along with this, we hope to see an increased monitoring and enforcement program to ensure sustainable fishing practices are followed.

EAC also recognizes the difficult times looming over our coastal communities due to COVID-19 and that further reductions in catch are even more difficult to implement at this time. However, with the reduced demand from markets around the world and financial supports put in place to look after the fishing sector, we feel DFO must continue to implement decisions that protect our oceans and help rebuild our struggling fish stocks.

Sincerely,



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