

March 30th, 2020

Hon. Minister Jordan
Minister of Fisheries, Oceans and the Canadian Coast Guard
200 Kent Street, Ottawa, ON

Re: Herring 4T (Spring 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. As a member of the Herring 4T Advisory Committee we are writing to urge you to make the difficult decision to put a moratorium on the Herring 4T Spring Spawning stock. DFO Science has *highlighted that even in the absence of fishery removals it is very likely (>90%) that the stock will remain in the Critical Zone.*

We recognize the enormous amount of work the 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 other than fishing pressure. EAC feels that the work to realize Natural Mortality 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 spring spawning stock. The fishing efforts have gone on much longer than this stock can handle; the DFO science assessment confirmed that the spring stock has been in the critical zone of the Precautionary Approach (PA) Framework since 2002. Since 1998 fishing pressure has exceeded the provisional PA 65% of the time. The added pressure of continued directed fishing on top of the natural pressures of prey decline due to ocean temperature sensitivity and increased predation, has given this species no chance of recovery since the mid-90's.

As stated in the 2020 DFO Science Assessment:

*Recruitment has remained stable at low values since 1994. This low recruitment corresponds with long term environmental changes including temperature increases and changes in zooplankton abundance. Given the ongoing trend towards warmer environmental conditions, it is not expected that recruitment will improve in future years (see **Figure 1**).*

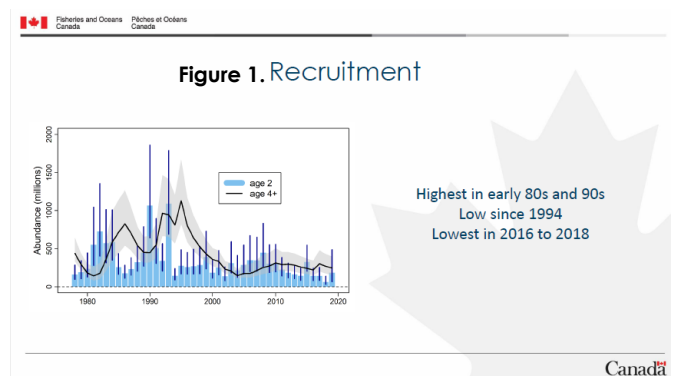


Figure 2 displays what DFO Science has confirmed, at any catch level the spring spawning stock will likely decline to a spawning stock biomass level of close to zero or tentative collapse by 2030. If there

was ever a time needed to exercise the precautionary approach it is now and for this spawning stock who has been stuck in the critical zone for almost 20 years.

The DFO Science 2020 assessment has also highlighted:

*The status of the stock has declined to such a low level that it is considered to be in a precarious state. In this zone, fishery management actions **must** promote stock growth and removals by all human [e.g. directed or bait fisheries] sources **must** be kept to the lowest possible level.*

EAC understands that a moratorium is economically difficult in the short-term fleets, however continuing to direct for this stock will lead to complete collapse of the stock and much longer-term economic hardship. Further, it is simply not responsible to allow a 'fish what is left since it will decline no matter what' philosophy to prevail. Herring is a critically important species for many other fish, animals, and birds in an ecosystem facing rapid change.

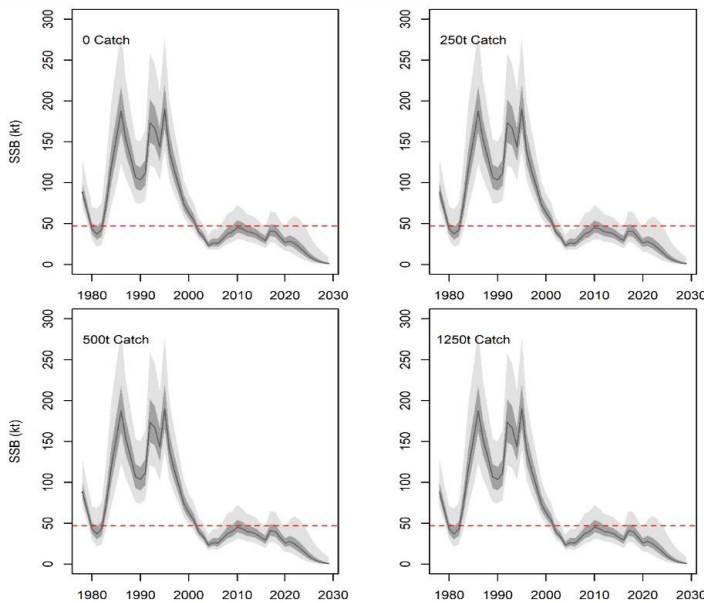


Figure 2. Stock Projections (DFO Science 2020)

Given the ongoing environmental change that Science points out will continue to keep recruitment low, management must address the factor that we can control – fishing pressure.

The data outlined above has led EAC to recommend a moratorium on the commercial, recreational and bait spring spawning fishery for the 2020 season. We also need to stress this closure stay until science shows positive signs of recruitment out of the critical zone for this stock.

We commend management on the 100% hail in requirement for bait fisheries that will begin this 2020 season and, should any catch be allowed, we recommend increased monitoring and enforcement to ensure sustainable fishing

practices are followed.

EAC also recognizes the difficult times looming over our coastal communities due to the COVID-19 and that further reductions in catch are even more difficult to implement at this time. However, we implore DFO Management to act with a longer term vision and adopt the strongest measures possible to allow the largest amount of spring spawning herring in 4T to stay in the ocean.

Sincerely,

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cc. Mario Gaudet, Senior Regional
Fisheries and Aquaculture Management
Officer
Mark LaFlamme, Coordinator Centre for
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