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## Ecology Action Centre Comments to the Scotia-Fundy Herring Advisory Committee

We thank Fisheries and Ocean Canada for the opportunity to provide our recommendations on the management of Atlantic Herring as discussed at the April 14<sup>th</sup>, 2026 SFHAC meeting. The Ecology Action Centre works locally, nationally, and internationally to advance fishing policies and practices that minimize harmful impacts on the marine ecosystem while benefiting coastal communities and supporting thriving fisheries.

### The Updated Herring Framework and Total Allowable Catch

We thank the department for the updated timeline for the herring framework and recognise the immense amount of work that has gone into this. We support the continued work by the department on this framework. We do not support the suggestion to re-introduce the failed MSE by non-departmental scientists into this process.

We recommend that every effort be made to avoid mid-season decisions on the TAC once the framework is complete. The ministerial decision in place was set for four years beginning in 2024, in part to provide stability for industry. Now with a decision to increase the TAC by 25 per cent mid-season, without consultation or scientific rationale, we are concerned that adjustments could be made before updates scientific advice is available.

This stock has been in the Critical Zone since 2017 and the IFMP states that when the stock is below the LRP, the harvest strategy should focus on rebuilding to a level above the LRP in a reasonable timeframe (6 to 8 years – 1.5 to 2 generations) with a high degree of probability. To comply with the IFMP, the TAC should be set with a very low risk of biomass decline.

We thank the chair for addressing the questions asked in the October 2, 2025 written correspondence to the Minister from the EAC, Oceans North and Oceana Canada during the advisory committee meeting. However, **we remain concerned that science has not evaluated whether the 2025 mid-season ministerial decision to increase the TAC by 25% will impact rebuilding above the LRP in 6-8 years, as required.**

The department must prioritise publishing, in the Canadian Gazette II, the Batch 2 list of stocks to Schedule IX of the Fishery (General) Regulations. These should include the Bay of Fundy/Scotian Shelf herring stock. It is unclear why there has been a delay and we urge the prioritisation of this decision.

### Fisheries Monitoring

There have been no at-sea observers present in the SWNS/BoF fishery since 2020, despite targets being in place. We recognise that there are limited resources and at-sea observers available across the region. However, after six years of no progress, it is unacceptable to have no independent at-sea monitoring for this fishery. We also note the concerns shared by Conservation & Protection including exceeding the number of gillnets used and reporting errors.

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EM has been at the forefront of discussions on how to address shortcomings of the system and increase reliable catch data in Canada. There is interest in improving at-sea observer programs and developing EVM further, but resources are needed to prevent this work from stalling. We believe this fishery is well positioned to pilot electronic video monitoring onboard commercial vessels. It requires what would be a modest investment compared to others made for scientific surveys and data collection. Research has also shown that EM on board can result in behaviour changes and increased compliance regardless of the specificity of the catch data that is captured. There have been many instances of reporting improvements following electronic video monitoring implementation.

### Closing

We thank you for taking the time to consider our input for Scotia-Fundy Herring Management this year and look forward to continued, transparent and productive discussions to safeguard Atlantic Canada's herring stocks and support our coastal communities.

Sincerely,  
Holly Isnor



Fisheries Program Manager  
Ecology Action Centre