
December 14th, 2021

Hon. Joyce Murray, P.C., M.P.
Minister of Fisheries, Oceans and the Canadian Coast Guard
200 Kent Street, Ottawa, ON
Sent by email

Re: 4T Atlantic Herring (Spring Spawners) TAC and Management for 2022 Season

Dear Minister,

The Ecology Action Centre is Atlantic Canada's oldest and largest environmental organization, founded in 1971. We sit on the Gulf Small Pelagics Advisory Committee as well as multiple advisory committees for other forage fish stocks in Atlantic Canada.

We are writing to recommend decisive action this year that will reduce fishing pressure on the severely depleted 4T Atlantic herring spring spawning stock to give this important population space to recover.

The biomass of spring spawning herring in the southern Gulf of St Lawrence has been in the critical zone for two decades with overfishing allowed since 1978. Even now, the full extent of fishery removals is not known because fish caught under personal bait licenses are not adequately accounted for. The rebuilding plan for this stock has not visibly progressed for at least four years and past management decisions have failed to encourage population growth. The science assessment has clear advice that removals from all sources should be as low as possible.

The Ecology Action Centre recommends the Total Allowable Catch (TAC) for the commercial fishery be set at 0 t for 2022. Furthermore, catches under personal bait licenses must be fully reported and monitored.

Population projections for this stock are bleak and reveal a low probability of recovery, even in the absence of fishing. Nonetheless, recovery probabilities are improved when fishing removals are reduced. Therefore, a TAC of 0 t is the **only management strategy that is in line with the Precautionary Approach Framework (PA)**, a crucial pillar of DFO's Sustainable Fisheries Framework.

We know that any reduction of fishing quota has impacts on incomes and livelihoods for fishers and plant workers, however past management decisions that have continued to allow the stock to be overfished only prolong the eventual closure of the fishery. Instead, committing to a short-term closure of the commercial fishery should result in faster rebuilding so that a thriving fishery can exist again soon. The Ecology Action Centre supports assistance from the department directly to owner-operator fishermen, small fleets, and plant workers to reduce the burden of any closure.

Decisive management action is needed now to rebuild spring spawning herring in the southern Gulf of St Lawrence and sustain fish populations for the benefit of future generations. Canada's Blue Economy can only thrive if abundance and biodiversity in our ocean are rebuilt.

Sincerely,



Sebastián Pardo
Sustainable Fisheries Coordinator

Cc:
David Giard, Chair, Gulf Small Pelagics Advisory Committee
Sylvie Leger, Senior Fisheries and Aquaculture Management Officer
Mireille Chiasson, Director, Resource Management and Aboriginal Fisheries, Gulf Region