November 12, 2021

The Honourable Joyce Murray  
Minister of Fisheries, Oceans and the Canadian Coast Guard  
200 Kent Street 
Station 15N100 
Ottawa, Ontario K1A 0E6

Ms. Rebecca Reid  
DFO Regional Director General, Pacific Region  
200-401 Burrard Street 
Vancouver, BC V6C 3S4

Re: 2021/22 Pacific Herring Food and Bait Commercial Fishing Plan

Dear Ms. Murray and Ms. Reid

We are opposed to all Strait of Georgia Pacific herring fisheries, both Food & Bait (starting Nov 20) and Roe (beginning late February). Until we see the Roe IFMP draft due in early December, our immediate concern is with the 2021/22 Pacific Herring Food and Bait Commercial Fishing Plan for the following reasons:

It is clear from the October 29, 2021 University of Victoria Herring Workshop of scientists from that there are two types of herring stocks - migratory and resident. The annual harvest allocation is predicated on an analysis of migratory stocks on the east coast of Vancouver Island. But these stocks are mixed in with resident stocks which Chinook salmon depend on for feeding in the Strait of Georgia in the summer when the migratory herring are on the west coast of Vancouver Island. The winter food and bait fishery targets these resident stocks and this explains why the resident stocks have decreased from 138 to approximately 30 sites recently.

The resident herring are fundamental to First Nations constitutionally protected fisheries.

Ecosystem Based fisheries management (EBM) is clearly the recommended management process for fisheries management. This plan is not EBM based. The plan does not take into account the needs of other marine species such as sea birds, whales, salmon and groundfish that rely on herring for much of their food.
Given all of the above we are asking you to be precautionary and not allow the Food and Bait fishery in the Strait of Georgia for the winter of 2021/22. Keep all herring fishing in the SOG closed until it is known what is the potential impact on residents in the Strait of Georgia and until stocks have a chance to rebuild throughout the SOG.

If this fishery is allowed to proceed we will again bring public attention to what we believe is a travesty in fisheries management and utilization.

Yours respectfully

Grant Scott, Conservancy Hornby Island

Cc:
James Meldrum, DFO
Bryan Rusch, DFO
Marisa Keefe, DFO
Chief Eric Pelkey, WSÁNEĆ Leadership Council
Gord Johns MP
Premier John Horgan
MLA Lana Popham
MLA Adam Olsen
MLA Scott Fraser
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Peter Luckham, Chair, Islands Trust Council
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