



Islands Trust

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February 8, 2018

Via email victoria.postlethwaite@dfo-mpo.gc.ca

Victoria Postlethwaite
Resource Manager - Herring
Fisheries and Oceans Canada
1420-401 Burrard Street
Vancouver, BC V6C 3S4

Dear Victoria Postlethwaite:

Re: Draft 2017/2018 Pacific Herring Integrated Fisheries Management Plan

Thank you for providing an opportunity to comment on the draft 2017/2018 Pacific Herring Integrated Fisheries Management Plan. We do not have any staff expertise in fishery management so are providing general comments.

We are interested in herring management issues because Pacific Herring are foundational to the food web of the Salish Sea and play a critical role in the functioning of our ecosystems. We understand that Pacific Herring are the dominant forage fish in the Salish Sea and a vital food source for species for seabirds and for many species of fish, including Chinook salmon, which it turn, is the main food source of the resident orcas.

We are concerned that the annual removal of 20% of the herring population may not support the needs of predator species, especially as populations recover.

We note that the Minister LeBlanc's mandate letter includes the direction to "Use scientific evidence and the precautionary principle, and take into account climate change, when making decisions affecting fish stocks and ecosystem management". We question whether there is sufficient scientific evidence available on the population, habitat, and ecosystem and fishery dynamics of the BC Pacific Herring to support management decisions. We are not aware of information being available about appropriate conservation limits for Pacific Herring based on ecosystem considerations.

It is concerning to us that the IFMP states that "the current maximum harvest rate of 20% under the herring management framework is believed to be conservative" after acknowledging that "there is no information available on the appropriate conservation limits for Pacific Herring based on ecosystem considerations". It does not seem precautionary to remove one fifth of a key forage fish from an ecosystem when the ecosystem-based needs of other species have not been fully considered.

The IFMP states that "research is ongoing to better understand these ecosystem processes and the role Pacific Herring play in maintaining the integrity and functioning of the ecosystem". This might sound reassuring— except that I understand that Pacific Herring IMFP's have contained a similar message for fourteen years. We encourage you to base future herring management decisions on sound, ecosystem-based research.

The Prime Minister's mandate letter calls for taking climate change into account in making management decisions. As far as we can tell, the draft IFMP does not consider climate change. We encourage research into how sea surface temperatures increases might affect herring productivity.

Islands Trust and WWF-Canada are co-hosting the Baynes Sound/Lambert Channel Ecosystem Forum in May, 2018. Fisheries and Oceans Canada (DFO) will be well represented at the Forum, along with First Nations governments, regional government, fishing industry and stewardship group representatives. Herring habitat will be one of the topic priorities at the Forum, which we intend will be an opportunity to share knowledge and work towards ecosystem-based solutions.

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Preserving *Island* communities, culture and environment

Bowen Denman Hornby Gabriola Galiano Gambier Lasqueti Mayne North Pender Salt Spring Saturna South Pender Thetis

We respectfully request that, for future Pacific Herring Integrated Management Plan consultations, DFO offer a more transparent and inclusive consultation process with a longer consultation period and more promotion of the consultation through the media and other distribution methods beyond the Fisheries notices webpage. We are pleased to note the new DFO ecosystem and habitat priorities, as introduced by Minister LeBlanc February 7, 2018. We trust that next version of the Pacific Herring Integrated Management Plan will reflect these priorities.

Many First Nations have asserted rights and title in the Islands Trust Area and we are aware that many of them have herring conservation and fishery interests. Although we copy First Nations on all correspondence such as this, we are not knowledgeable about their positions on the Draft 2017/2018 Pacific Herring Integrated Fisheries Management Plan. Given our commitment to reconciliation with First Nations, we offer the Islands Trust position while being ready to respectfully consider their positions, as they become known.

The Islands Trust Council is a federation of local government bodies representing 25,000 people living within the Islands Trust Area and about 10,000 non-resident property owners. The Islands Trust is responsible for preserving and protecting the unique environment and amenities of the Islands Trust Area through planning and regulating land use, development management, education, cooperation with other agencies, and land conservation. The Islands Trust Area includes the ocean between the British Columbia mainland and southern Vancouver Island, including areas of vital orca habitat, vibrant aquaculture and wild fisheries, as well as vital herring and other forage fish spawning areas.

Yours sincerely,



Peter Luckham

Chair, Islands Trust Council

pluckham@islandstrust.bc.ca

pc: Cowichan Tribes
Esquimalt First Nation
Halalt First Nation
Homalco First Nation
Hul'qumi'num Treaty Group
K'omoks First Nation
Klahoose First Nation
Laich-kwil-tach Treaty Society
Lake Cowichan First Nation
Lyackson First Nation
Malahat Nation
Musqueam First Nation
Nanwakolas Council
Pauquachin First Nation
Penelakut Tribe
Qualicum First Nation
Scia'new (Beecher Bay) First Nation
Semiahmoo First Nation
Shíshálh (Sechelt) First Nation
Snuneymuxw (Nanaimo) First Nation
Songhees First Nation
Snaw-naw-as (Nanoose) First Nation
Squamish First Nation
Stz'uminus (Chemainus) First Nation
Te'mexw Treaty Association
Tla'amin (Sliammon) First Nation
T'Sou-ke (Sooke) First Nation
Tsartlip First Nation
Tsawout First Nation
Tsawwassen First Nation
Tseil-Waututh (Burrard Inlet) First Nation
Tseycum First Nation
We Wai Kai (Cape Mudge First Nation)
Wei Wai Kum (Campbell River First Nation)
Association for Denman Island Marine Stewards
Hornby Island Local Trust Committee
Conservancy Hornby Island
Bowen Island Municipal Council
San Juan County
Islands Trust Council
Islands Trust website