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October 25, 2019

File Number: 5020-30 Fisheries-Herring

via e-mail: [jonathan.wilkinson@parl.gc.ca](mailto:jonathan.wilkinson@parl.gc.ca)

The Honourable Jonathan Wilkinson  
Minister of Fisheries, Oceans, and the Canadian Coast Guard  
House of Commons  
Ottawa, ON K1A 0A6

Dear Minister Wilkinson:

**Re: Moratorium on the Herring Fishery in the Salish Sea**

On behalf of Bowen Island Municipal Council and Islands Trust Council, we are writing this joint letter to request that you place a moratorium on the herring fishery in the Salish Sea until an ecosystem-based management plan is in place that considers the current and future effects of climate change and the potential impacts of the fishery on predator species, in particular, Chinook Salmon and Southern Resident Killer Whales. We are asking for this preventative action to ensure that precautionary measures are being used in the management of herring, a keystone species in the Salish Sea.

We are concerned with herring management issues because as you know, Pacific herring are foundational to the food web of the Salish Sea. Herring play a critical role in the functioning of the ecosystem. Pacific herring are the dominant forage fish in the Salish Sea and a vital food source for species of seabirds, and for many species of fish; including Chinook salmon, which in turn, is the main food source of the Southern Resident killer whales. As well, herring are a fundamental part of the marine food web for Coast Salish peoples who have resided within this landscape since time immemorial.

We are concerned that the annual removal of 20% of the herring population may not support the needs of predator species, especially as populations struggle to recover. We note that your mandate letter includes the direction to “use scientific evidence, traditional Indigenous knowledge, 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 the fishery dynamics of the BC Pacific Herring to support current management decisions. We are not aware of information being available about appropriate conservation limits for Pacific Herring based on ecosystem considerations in the context of the cumulative effects of climate change.

We ask for your leadership to protect one of the foundational species – the BC Pacific herring - for language, cultural, and spiritual understanding of this area of the Salish Sea for First Nations, and conversely for all British Columbians and Canadians. A moratorium is needed until ecosystem based management plans are developed for the herring fishery that consider community and the pivotal role this species plays in the vitality and health of this region. The health of the Salish Sea and its complex food webs are too crucial to risk.

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Collaboration with all levels of government from First Nations, local government, and federal and provincial agencies is vital to protect the herring from fisheries impacts in this time of climate change. We ask for your support in enacting initiatives and policies that would put this moratorium in place until these management plans, and herring health and sustainability as a keystone species are determined.

We have invited First Nations within the Islands Trust Area to participate with us in advocating for the protection of herring in the Salish Sea and we recognize the work of the First Nations Leadership Council and the BC Assembly of First Nations in regard to the herring fishery. Islands Trust is committed to the implementation of United Nations Declaration on the Rights of Indigenous Peoples and the Truth and Reconciliation Commission of Canada's Calls to Action, and believe that reconciliation includes respect and recognition of traditional ecological knowledge, inherent rights, and collaborative decision making on management plans.

Thank you for considering this matter.

Yours sincerely,



Peter Luckham  
Chair, Islands Trust Council  
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Mayor Gary Ander  
Bowen Island Municipal Council  
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cc: Islands Trust Area MPs  
BOKÉĆEN (Pauquachin) First Nation  
Cowichan Tribes  
Halalt First Nation  
Homalco First Nation  
Klahoose First Nation  
K'ómoks First Nation  
Lake Cowichan First Nation  
Lekwungen (Songhees) Nation  
Lyackson First Nation  
MÁLEXEŁ (Malahat) Nation  
Penelakut Tribe  
Qualicum First Nation  
Scia'new (Beecher Bay) First Nation  
SEMYOME (Semiahmoo) First Nation  
shíshálh First Nation  
Snuneymuxw First Nation  
Skw̓wú7mesh (Squamish) Nation  
Snaw-naw-as (Nanoose) First Nation  
S̓ÁUTW̓ (Tsawout) First Nation  
Stz'uminus First Nation

SXIMEŁEŁ (Esquimalt) Nation  
Tla'amin (Sliammon) Nation  
Tsawwassen First Nation  
Tseil-Waututh Nation  
T'Sou-ke Nation  
Wei Wai Kum (Campbell River) First Nation  
We Wai Kai (Cape Mudge) First Nation  
W̓JOLEŁP (Tsartlip) First Nation  
W̓SIKEM (Tseycum) First Nation  
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First Nations Leadership Council  
Hul'qumi'num Treaty Group  
Laich-kwil-tach Treaty Society  
Nanwakolas Council  
Naut'sa mawt Tribal  
Te'mexw Treaty Association  
Bowen Island Municipal Council  
Islands Trust Council  
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