

A SUSTAINABILITY FRAMEWORK FOR ATLANTIC HERRING PRESENTATION TO FRCC BY THE BARRY GROUP

Introduction

The Barry Group has a 100 year involvement in the Gulf of St. Lawrence herring fisheries which, until more recent years, have been largely concentrated in NAFO sub-area 4R. Today the Barry Group operates “large seiners” in both 4R and the southern Gulf.

Much of the more recent history of the Gulf herring fisheries is well covered in the January, 2008 slide presentations to the FRCC Panel entitled “Southern Gulf of St. Lawrence Fishery Management” and “NL Region – West Coast and Labrador Straits Herring”. These reports provide a useful general overview of the Gulf of St. Lawrence herring fisheries.

Largely because of the mis-management of the fishery in the late 1960’s and early 1970’s, due to the introduction of many large purse seines from British Columbia to Atlantic Canada (omitted from the NL presentation), quotas were implemented for the first time in 1973. The purse seines fleet had quickly gained a poor reputation due to a largely unregulated fishery for reduction purposes. Some of this mistrust lingers on today, despite the fact that there is no directed fishery for reduction purposes.

A landmark decision which followed the introduction of quotas was the restructuring of the purse seine fleet. Gulf based seiners were restricted to the Gulf of St. Lawrence and Scotia Shelf based seiners to the Scotian Shelf. A 10-year plan, introduced in 1983, reduced the number of licenses for the Gulf of St. Lawrence to 16, between New Brunswick and Newfoundland. Today, there are 13 licenses, with access to the entire Gulf (4RST) and historical access to 4Vn (for a portion of the year).

Today, this large purse seine fleet is administered under an ITQ regime. The Barry Group either owns or manages 11 of the 13 seines in this fleet. In this sense, Barry Group is a significant stakeholder in the herring fisheries of the Gulf of St. Lawrence.

Mandate of the FRCC

The FRCC has been asked by the Minister of Fisheries to develop a long-term strategic approach to the sustainability of the Atlantic herring fisheries and the conservation of the resource.

We submit that sustainability must include the adoption of measures that will provide for a high probability that the fish stocks will be able to replenish themselves over a long period of time, that a sound ecosystem be maintained and that there be economic viability for the participants in the fishery.

We believe that there are valuable lessons to be learned from the practices of other countries which have seen their herring stocks depleted and slowly rebuilt, with a fleet profile that allows for the production of quality products, harvested by seiners.

Any successful long-term strategy requires that more financial resources be dedicated to improving the science of herring. In that regard, much needs to be done.

Annual Stock Assessments

It is our contention that priority must be placed on larval surveys and acoustic surveys. Much less priority should be given to the “index” gillnet fishery surveys, with financial resources expended here rededicated to the larval and acoustic surveys.

It is unfortunate that there has not been an acoustic survey in the Gulf of St. Lawrence since 2002. The Herring Science Council submission discusses the acoustic surveys on the Scotian Shelf and sees these surveys as an absolutely necessary tool in annual stock assessments.

We strongly recommend that DFO dedicate funding towards an annual acoustic survey in the Gulf of St. Lawrence in partnership with industry. The technology could be purchased by DFO and placed onboard one of our fleet of seiners, which could calibrate and record biomass. The use of such technology has world wide acceptance as the preferred method of stock assessments. Single stock assessments are still necessary.

At this time, the main scientific survey in the Gulf is the pelagic larval survey carried out by the Barry Group, at an expense to us of about \$100,000 per year. This survey is also of benefit to an improved understanding of capelin and mackerel egg counts in the surveyed areas.

While it is acknowledged that there is a herring capture in bottom trawl abundance surveys which are carried out annually in the Northern Gulf and on the West Coast of Newfoundland, the bottom trawl surveys are of little or no value in measuring the abundance of pelagic species.

An index of abundance is especially required for the two herring stocks in 4R is required, there being no analytical assessment currently being conducted due to the discontinuance of the acoustic surveys in 2002. Thus, there is no official statement of biomass and abundance of various year classes, although as an industry we are of the view that the fishery is being conducted in a most conservative manner as it relates to TAC

Major Risk Factors and Threats to the Sustainability of the Fishery

A major risk factor is the directed roe fishery by gillnets. In addition to this directed fishery upon a spawning stock (remember Northern cod), there is significant uncontrolled dumping as well as by-catch and ghost-net fishing issues to consider.

Relative to gill netters, and there are 4,000 herring license in the Gulf of St. Lawrence, purse seiners are easier to monitor and are much better monitored, through black boxes and DMP. Fully 100% of the catch is monitored, and, we feel, to an excessive level which is very costly to our industry. Purse seines have no bottom contact.

We recognize that there is a fishery for roe bearing capelin, but this is a very small fishery relative to the stock biomass, and capelin has a much shorter life cycle.

However, we must emphasize that potentially the single greatest risk factor is the lack of science. We believe the resource to be strong and the quota to be modest, but this does not diminish the need for better science.

Existing Best Practices

Certainly, the most successful pelagics fisheries are carried out with purse seines which have the ability to preserve the cold chain from the ocean to the production line.

The 4R purse seine fleet is a model of best practice, for reasons noted, e.g. 100% DMP, Observer coverage at sea, emphasis on quality, ease of management, an ITQ fishery, pooling of the catch, etc.

New Solutions / Opportunities

There is an opportunity for an effective partnership to enable better science, effective quota management and cost reduction to the fishing fleet. We are prepared to work towards partnerships models that are working well in other fisheries.

The politics in this fishery is sometimes brutal, but there is an opportunity to develop a partnership while improving transparency. A first step is for the various fleet sectors to recognize the historical rights of each other to exist. Government can perhaps help with this message.

Fishing Methods and Practices

Large purse seines fishing in the Gulf of St. Lawrence have many advantages over other fishing methods

- No interaction with the sea bed
- No significant by-catch
- Less fuel consumption per ton of raw material landed
- High quality raw material
- Low incidental mortality
- No, or very little, by-catch of marine mammals or sea birds

Seabed interaction was an issue raised with Allister Surette in his 2004 report on conflict between mobile and fixed gear fishers in the southern Gulf, it being a major concern of inshore fishers. He could find only one study on fishing method impacts which made reference to purse seines. It rated purse seines as low impact and gill nets as high impact on the ocean floor. Observations by divers on the West Coast of Canada confirm this finding that purse seines cause no impact to sea-bed habitat.

While any fishing method can be abused, we believe that mortality from our purse seine fleet is low, even at times when the fish have to be released from the seine.

Fisheries Management Issues

Our fishing fleet has had great difficulty in convincing DFO to open the fishery early in the year, when it needs to be opened. This year the delay in issuing licenses to the 4R herring seiners was very costly to our fleet. This small fleet of 5 vessels should have been allowed to harvest a portion of its herring ITQ, while awaiting release of the management plan. We recommend that there be a mandatory date by which fishing licenses are required to be issued.

Another management irritant is the new decision that all fish must be weighed at dockside. In the case of herring and other pelagics, this adds significant cost, and leads to a reduction in quality once the water is removed from the fish. The reason given for the decision to move away from the dip method was that DFO was having difficulty in prosecuting vessels that exceeded their catch. We understand that this may have merit in certain instances for other fleets. However, it is unnecessary for the fleet of large seiners, as the same result can be achieved by other less costly means.

Just a few years ago, our vessels were calibrated for the dip method at a cost in excess of \$100,000. The dip method has proven to be highly accurate for the large seine fleet. The recordings from the dip method are easily confirmed when the fish is weighed at the plant. The dip method is practiced throughout many countries and deemed to provide an accurate record of landings for larger vessels.

If there is a problem with other fleet sectors, it should be addressed with these fleets.

Our fleet of seiners in 4R is currently engaged in a Marine Stewardship Council pre-assessment which should lead to a full certification of the large purse seine fleet in the 4R area of the Gulf. Our one concern is the lack of science to support a certification.

A bigger picture approach to fisheries management is required. All fishers have a large stake in the sustainability of the herring and other resources where ITQ's are in place. Management of the herring fishery is simply too influenced by political imperatives. This imposition of the 25 – fathom line on the north side of PEI and the closed areas around the Magdalen Islands are such examples of decisions based on political reasons rather than good science considerations. In fact, the yield from the herring fishery is less than optimum in the southern Gulf because the seiners have been excluded from fishing areas due to political pressures, not because there is a threat to the herring stocks. Meanwhile, we believe in a distribution of fishing effort rather than harvesting the full quota from a single fishing area.

Handling Practices

Certain harvesting and fish handling practices can lead to the creation of histamines in herring and other fish species. This can happen when the chain of cold is not maintained, or when the struggles in gill nets elevate histamine levels. The European market is especially sensitive to histamines, and Canadian product has been rejected due to non-compliance with food safety regulations in Europe.

Conclusions

This presentation has covered various issues in the herring fishery, all of which fall under the FRCC definition of sustainability (Preparation of a Sustainability Framework for Atlantic Herring).

We appreciate that your deliberations must consider the perspectives of all user groups and we do not wish to denigrate their viewpoints, but rather defend the role of the 13 purse seine licenses in the Gulf, which are fished on 10 vessels only, as opposed to the 4,000 fixed gear licenses. Our voice is often lost, although our share of the herring quota is 55% in West Newfoundland and 23% in the southern Gulf.

Our fleet is well positioned to increase the value of the herring resource. Although by international standards, our vessels are small, they are most effective in harvesting pelagic fish stocks of highest quality and highest market value in a sustainable manner. The very nature of the pelagic fisheries is that the vessels employed be able to land their catch in relatively large volumes, that processing plants be equipped to produce in high volume, and that the product be marketed in volume. That is the nature of the fishery.

We think it is important that the FRCC go beyond the Surrette report of 2004, which identified the issues and positions of the various parties, stakeholders and otherwise, and presented some analysis and advice to the Department on the future management of Southern Gulf herring. It was a very good start, but did not go the extra step of making strong recommendations.

We are pleased that you are seeking comments on all matters relating to sustainability of herring fisheries, including new approaches. A comprehensive approach is required, one that will lead to improved conservation practices, straight-forward management practices and the establishment of a framework for the viability of the various fleets that hold herring quotas. We wish you well in your deliberations.

Thank you.

June 23, 2008