



# **P.E.I. FISHERMEN'S ASSOCIATION LTD.**

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April 8<sup>th</sup>, 2022

Honorable Joyce Murray  
Minister of Fisheries, Oceans & Canadian Coast Guard  
House of Commons  
200 Kent Street,  
Ottawa, ON, Canada  
K1A 0A6

## **RE: UNEXPECTED CLOSURE OF MACKEREL AND SPRING HERRING COMMERCIAL AND BAIT FISHERIES**

Dear Minister Murray,

The Prince Edward Island Fishermen's Association (PEIFA) represent 1275 independent core fish harvesters on PEI; all of whom are impacted by the announcement of the mackerel and spring herring closures. Deck hands, harbour workers, local businesses and rural fishing communities are also affected by this harsh decision. The PEIFA would like to share the following facts we feel were not considered when the decision was made to close the mackerel and spring herring commercial and bait fisheries.

**Sharing stock:** The Canadian mackerel stock is shared with the United States because of the mackerel migratory pattern. During the US Atlantic Mackerel Stock Status and Rebuilding Public Information Webinar (Jan. 11, 2022), NOAA (National Oceanic and Atmospheric) explained that US mackerel management works as follows: Total Allowable Catch (TAC) in the US is determined, the Canadian TAC is then subtracted, then the expected recreational catch is subtracted, and the US commercial fishers are left with what is remaining. If Canada decreases TAC, the amount available to US fishers increases. The fish Canada is trying to protect will be removed via the US. **There is zero decrease in the total removals with this decision.**

**Costs:** As local and affordable bait becomes more difficult to access, the overall price and availability of bait becomes a growing concern for our members. Harvesters on PEI have had the ability to fish for their own bait for decades, enabling them to keep costs manageable. Removing access to a herring/mackerel bait fishing license significantly increases the economic burden on fishers. With new fishers purchasing fleets at soaring prices, coupled with recent and significant increases in fuel prices, our fishers cannot afford another financial hit. **The economic importance of the bait fishery cannot be understated.**

**Data collection:** By removing all herring and mackerel fisheries, DFO (Department of Fisheries & Oceans) is removing major stock assessment data sources used to evaluate the health of the stock. In your recent announcement it is stated that closures will be revisited following the next stock assessment. Without these key data inputs, we are not confident the upcoming stock assessments will provide any type of solid



accurate advice on the future of these fish populations. Furthermore, the lack of funding resources towards baseline research on these species is evident as fishing industry associations are being asked to bear the additional costs of adequate sampling in the absence of fishing activity. **By maintaining a bait fishery and working with fish harvesters, the DFO can maintain the level of fishery dependant data needed for both the spring herring and mackerel stock assessment.**

**Science:** The result of the scientific model developed for the stock assessment is not reflective of what our fishers are seeing on the water. Fishers are seeing positive indicators like potential improved recruitment and new spawning areas and have requested that DFO expand their science to encompass what fishers are observing. **The PEIFA have been requesting for years that the gaps in the science and the modelling be properly addressed and take into account their expertise and day-to-day experience on the water.**

**Recommendations not considered:** The PEIFA has about 200 volunteer fishers from across the Island who participate on Advisory Committees for various fisheries. Their role on these Committees is to provide input and advice on fisheries management plans and science stock assessments. They collaborate with other fishers, scientists, and managers on solutions to address the challenges that impact the fishery and the stock. These solutions and recommendations are shared through the DFO Atlantic Mackerel Advisory Committee (AMAC) and the DFO Gulf Small Pelagics Advisory Committee each year. The PEIFA has been submitting recommendations through this avenue, accompanied with letters directly to the Minister, for years but we have never seen any of these recommendations come to fruition. We question whether there has been any meaningful consideration of these recommendations by the DFO and the Minister. **This is a missed opportunity on DFO's behalf to work with industry on developing realistic solutions.**

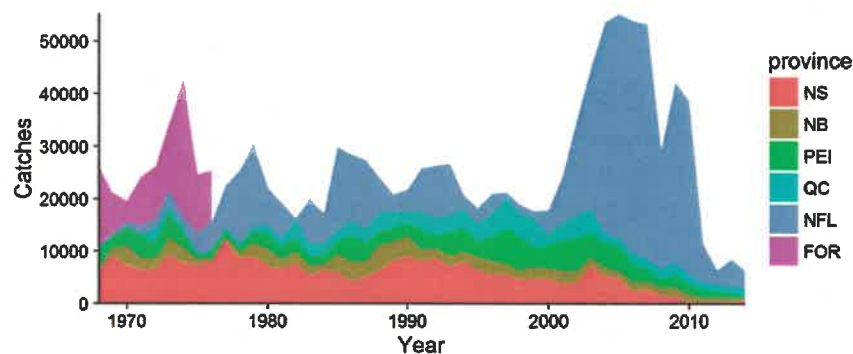
**Alternative Bait:** The announcement notes that "many harvesters have already begun sourcing bait from elsewhere or using alternative bait." The PEIFA has numerous concerns related to this: a.) lack of scientific data to support viable alternative baits; b.) no formal studies completed to assess financial implications of tradition bait vs. alternative bait; and c.) alternative bait sourcing has not been tested and deemed safe for lobster consumption or the Southern Gulf of St. Lawrence eco-system. The PEIFA requested a bait working group be established to start addressing these concerns, in collaboration with DFO, before it became an issue. **This obviously did not happen.**

**Seals:** Targeted action addressing the overpopulation of seals needs to be the primary focus of the rebuilding strategies of our small pelagic and groundfish stocks in the southern Gulf of St. Lawrence. Commercial landings of 500 mt amount to approximately 1% of all removals from the spring herring spawning stock biomass (SSB) while removals by predation (namely seals) are estimated at upwards of 41-67% of the SSB. Blaming the current fishery removals as hindering the rebuild is unfair and inaccurate. DFO acknowledged that a grey seal reduction greater than 65% is required to witness any rebuilding of the southern Cod, hake, plaice and other groundfish stocks. DFO also acknowledges an increase of mackerel as grey seal prey source on page 12 of the draft Atlantic Mackerel IFMP. All platforms available to our Association have been used to communicate our frustration, recommendations and our collective industry support for targeted grey and harp seal population controls. To date there has been no forum



within DFO that can incorporate seal population control into fisheries management plans and rebuilding strategies. **Rebuilding plans for all stocks are doomed to fail without addressing the seal population.**

**Seiners:** We recommend a moratorium on the mackerel and herring seining fleet across the entire Atlantic Region (PEI, NS, NB, QC and NFLD) until the mackerel and herring stocks recover to the healthy zone. Based on evidence presented by DFO: "Up to the early 2000s, gillnets, jiggers and traps accounted for the majority of Canadian mackerel catches. The majority of catches from the mid 2000's on have been by the small (<19.8 m) and large (>19.8 m) seiners, which were used primarily in Newfoundland. Between 2002 and 2007, small seine landings ranged from 10 833 t to 29 161 t, and large seine landings from 6 074 t to 14 645 t. In more recent years, small seiners (purse, tuck and bar) have landed the majority of the catch in the commercial fishery." This paragraph clearly identifies the gear type capable of the highest catch rates and therefore the starting point for effective change in this fishery. The following graph, presented in the science presentation on March 30, 2017 at AMAC, clearly shows a sharp increase in catches in NFLD (seiners) followed by a decline in catches throughout the Atlantic region. Although Prince Edward Island also has about 250 seiner licenses which would be affected, the PEIFA feels this is key to regrowth in the Atlantic mackerel stocks.



If the PEIFA thought a shutdown of the fishery would allow the stock to rebuild, this would be easier to accept, but this closure will not work. Additionally, there is NO rebuilding plan in place for mackerel or spring herring.

The conversation around bait is not new to the PEIFA and quite frankly we are disappointed in DFO's continued re-active approach when it is obvious that there was time for a more pro-active one, if DFO would have taken consultation with industry serious for the last few years. Although we are disappointed, we are also aware that we still need to find a solution. A closure of the commercial/bait fishery is ineffective at rebuilding the stock, will severely impact the monitoring of the spring herring and mackerel stock in the future and is an unacceptable option for our members.



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We ask you to carefully consider all the points outlined in this letter coupled with the valuable recommendations submitted to you and your Department on behalf of our members. Maintaining access to our bait fisheries is paramount moving forward and we want to work diligently with the DFO to reinstate that access for the 2022 season and work collaboratively towards a realistic plan to address the issues facing these stocks.

Sincerely,

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Robert Jenkins, President  
On behalf of the PEIFA Board of Directors

CC: Hon. Lawrence MacAulay, Minister, Department of Veteran Affairs  
Robert Morrissey, Member of Parliament, PEI  
Heath MacDonald, Member of Parliament, PEI  
Sean Casey, Member of Parliament, PEI  
Hon. Jamie Fox, Minister, PEI Department of Fisheries and Communities