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The herring fishery in 2+3 has a history of landings being well below the Total Allowable Catch (TAC). As seen in the landings table below, from 2005 to 2016, slightly more than half the TAC was landed annually. From 2017 to 2020, well less than 50 percent of the TAC was landed each year. The TAC increased to 14,842 t in 2021, however landings were just 2,500 t, or 17 percent of the TAC. The landings data below are commercial landings and do not include the bait allocation.

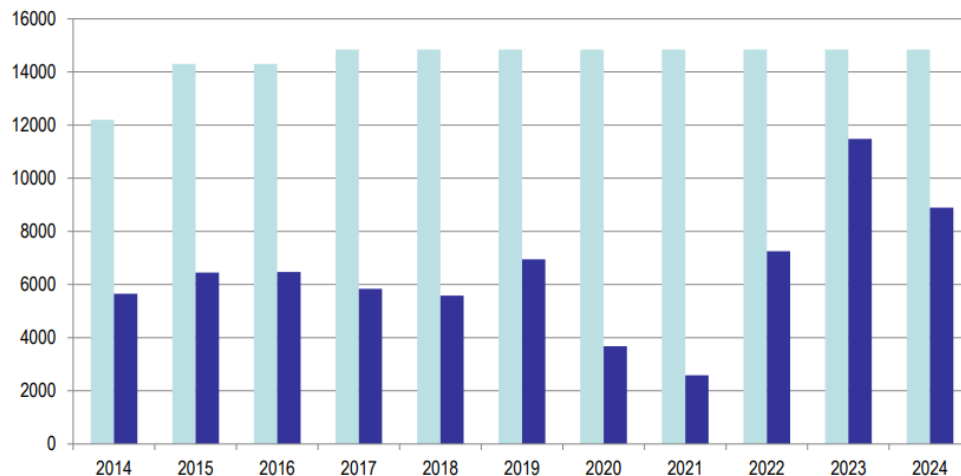
Table 1. Herring TAC and Commercial Landings (tonnes) 2005 to 2020

Year	TAC	Landings
2005	11,550	7,566
2006	11,550	6,254
2007	12,650	6,543
2008	12,650	7,575
2009	11,480	7,557
2010	12,370	6,446
2011	12,370	3,701
2012	12,370	5,058
2013	12,200	6,775
2014	12,200	5,655
2015	12,690	6,448
2016	12,690	6,468
2017	13,240	5,832
2018	13,240	5,571
2019	13,240	6,950
2020	13,240	3,680

Source: Policy & Economics Branch, NL Region



2J3KLPs Herring TAC/Landings



For the last several years, harvesters have observed that herring were no longer meeting the 93/4” minimum legal size and were maturing at a smaller size. There was an abundance of fish in 2+3, but they were not meeting that minimum. This meant that harvesters would spend time searching for legal-sized fish and incurring expenses in what is a volume-driven fishery. At the 2022 advisory, DFO noted in a presentation on the stock structure and overview of the fishery, that the low landings in 2020 and 2021 were related to an abundance of undersized herring. Thus, the low landings were not a result of a lack of fish, but rather there was a change in the biology of the fish, and they were no longer meeting the legal minimum size.

The minimum size for herring is based on the L50 - the size at which 50 percent of the fish reach sexual maturity. Up to the 2023 season, the minimum legal size for herring was 9 3/4”. At the 2+3 herring advisory in the fall of 2022, DFO reported that their research showed that the L50 had decreased, and the minimum size would be adjusted to reflect that change. The change was made in time for the 2023 fishery, when the minimum size was reduced to 8 3/8”. With this decrease in size, harvesters knew that more herring would be available to the fishery and the TAC could now be landed. The abundance of herring they had seen in recent years, combined with the smaller minimum size, meant that more herring would be available to the fishery, therefore harvesters recommended a 100 percent increase in the TAC for 2023-2025 management cycle. On March 24, the department set the TAC at 14,842 t which was a rollover from the previous year.



DWAN STREET
President

JASON SPINGLE
Secretary-Treasurer

When fishing began in April of 2024, multiple Herring Fishing Areas were closed within days of opening. Below is a summary of opening and closing dates for the mobile gear fleet in 3K and 3L that shows how quickly HFAs/bay quotas were caught (the example given is for the mobile gear fleet because according to information presented at the 2022 advisory, this fleet accounts for 70-80% of herring landings). It is important to note that the mobile gear fleet typically moves from bay to bay, so even though multiple bays might be open, the fleet typically targets one bay at a time before moving on to the next one (this is preferred by buyers for logistical reasons). This is clearly seen in the 3L spring and fall fishery, where once fishing started, bays closed sequentially in very short order. The harvesters all documented great catches, with many fish being well above the minimum legal length. For comparison, in 2022, the spring season closed according to the date set out by the management plan, because the quota was not taken in any areas, and the fall fishery extended into the new year, again because the quota was not taken.

MG SPRING 2024

Opening - 3K	Closing	
April 5	June 30	Area 3 (Purse Seine)
April 5	May 13	Area 4 (Purse Seine)

Opening - 3L	Closing	
April 1	April 5 (TB)	
	April 10 (BB)	
	April 11 (CB/SS)	**re-opened for two, eight-hour fisheries
	June 30 (3K)	**impacted by ice conditions

Opening - 3Ps	Closing	
April 1	April 5 (TB)	
	April 10 (BB)	
	April 11 (CB/SS)	**re-opened for two, eight-hour fisheries
	June 30 (3K)	**impacted by ice conditions



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MG FALL 2024

Opening - 3K	Closing	
Aug 15	Oct 1 (WB)	Area 3
Aug 15	November 27	Area 4

Opening - 3L		
Aug 16 for WB-NDB	Oct 1 (WB)	
	Nov 18 (NBD)	
Oct 10 for 3L	Nov 22 (BB)	
	Nov 27 (TB)	
	Dec 2 (CB/SS)	

Opening - 3Ps		
Aug 16 for WB-NDB	Oct 1 (WB)	
	Nov 18 (NBD)	
Oct 10 for 3L	Nov 22 (BB)	
	Nov 27 (TB)	
	Dec 2 (CB/SS)	

Harvesters understood that the decrease in the minimum size would result in the mobile and fixed gear allocations being landed, which is what we saw in this 2023/24 management year. Since a certain portion of the quota is reserved for bait fisheries, it is to be expected that landings will fall short of the TAC even though the fixed gear and mobile gear quotas are fully landed. Landing the mobile and fixed gear quotas in 2024 in such a brief period shows there is an abundance of herring that is now available to the fishery and that harvesters and processors are keenly interested in the herring fishery. Without access to landings data because privacy thresholds were not met this year, it can only be assumed that the vast majority of the TAC was taken.

Additionally, harvesters were very concerned after this years' presentation by DFO-Science at the advisory. They unanimously disagree, and strongly, with what was presented, as it completely contradicts what they have observed the last few years. Harvesters' observations, photos and testimonials are included in the Appendix. A common assessment, even from harvesters with decades of experience, was that they have never seen this amount of herring in their bays, including small herring. It is clear that harvesters and DFO have a sizeable gap in their respective understandings of herring abundance and the different size classes.



Specifically, harvesters see issues with the both the timing of the survey and what information is being gathered and assessed. Survey timing has stayed consistent over the past few decades, but this has not accounted for changes in fish distribution and timing due to environmental factors such as warming water temperatures. The time at which fish show up in a bay has changed, but the survey has not changed as well to account for this. In addition to the timing, herring are not showing up in the same areas of each bay as well. The DFO-Science update suggested low recruitment but harvesters argue that changes in the timing, distribution and depths means that the surveys are missing the bulk of the herring, especially recruitment and small herring.

Harvesters objected to the use of landings data, specifically samples collected from processors, for any understanding of the sizes and age classes in the ocean. The fishery has minimum size restrictions so there will be limited information on the size of herring in the stock area. Pelagic fisheries are difficult to assess, but more science could be undertaken collaboratively with fish harvesters, including broader acoustic surveys to complement existing net surveys.

Given the above issues we strongly disagree with the conclusions of DFO-Science Update presented at the advisory. The update does not - at all- correspond with harvesters' observations, experience and understanding of stock status, which is based on countless hours on the water over a much broader area and season, and therefore, better able to see changes in abundance, timing, size structure and distribution. We are therefore reiterating our year request for a 100 percent increase in the TAC as an interim measure for the 2025/26 season that reflects the volume of fish now available to the fishery.

Recommendations:

1. **100% increase in TAC for most fleets**
2. **Yearly assessments/advisories and LF50 review:** Harvesters are recommending having the advisory on an annual basis with a yearly review of the L50. It is imperative that the L50 be provided and reviewed on an annual basis, as harvesters do not want to unknowingly destroy the herring fishery because they are fishing with an unknown L50. The harvesters strongly believe that having this report is imperative because without this document annually, they could catch immature fish, which will be extremely damaging to the stock and the L50 is the process in place that is there to protect the stock. During the 2024 Herring advisory it was communicated by harvesters that this should be completed on an annual basis. With the danger of 6 years not looking at recruitment, it has the potential to decimate the future stock.



3. **More/additional science and more opportunities to work collaboratively:** The information provided in the 3KLPs Atlantic Herring Science Update does not accord with harvesters' observations of herring abundance and size structure. Longtime herring harvesters are reporting very high abundances and a range of size classes. This radical difference in understanding of stock status points to a need to work collaboratively. Herring, like other pelagic species, is difficult to assess given changing distributions, particularly in a rapidly changing ocean environment. For example, harvesters in Notre Dame Bay and White Bay region noted that herring were distributed north and in deeper waters than the area covered by the acoustic survey. Harvesters reject the use of landings data for any discussion of size structure, given the minimum legal-size restrictions. If an aggregation of herring is primarily composed of undersized fish, it will not be fished. There was considerable frustration at the gap in understanding of stock status between DFO Science and fish harvesters for this, and other, pelagic species. Harvesters have a strong interest in addressing this gap collaboratively. Harvesters are recommending there be a mechanism put in place to complete acoustic surveys on spawning concentrations, so there can be a handle on the spawning biomass, that will give an indication of the year class recruitment. It is evident that other than completing this type of mechanism, there is no other way to determine what is happening in the ocean. This approach is used to assess other pelagic stocks in Canadian waters.
4. Harvesters are recommending that the 50/50 spring/fall split be maintained. The fishery would open on April 1st, and close when 50% of the quota is reached.
5. **More time between the assessment and advisory:** Harvesters recognize how crucial good science work is to the continued health of the stock, and are requesting more time between the assessment and advisory.