

## **PROPOSAL 175**

### **5 AAC 27.195. Sitka Sound commercial sac roe herring fishery.**

Establish a 15,000 ton harvest limit for the Sitka Sound sac roe fishery.

5 AAC 27.195. Sitka Sound commercial sac roe herring fishery. (a) In managing the commercial sac roe herring fishery in Section 13-B north of the latitude of Aspid Cape (Sitka Sound), the department shall (1) manage the fishery consistent with the applicable provisions of 5 AAC 27.160(g) and 5 AAC 27.190;

ADD THE FOLLOWING LANGUAGE:

a) Sitka Herring Fishery will have a 15,000 ton harvest cap

**What is the issue you would like the board to address and why?** The Sitka commercial seine herring fishery is a "sacroe fishery" because of the historical focused on sac-roe markets. There is a great deal of controversy regarding the herring fishery because it targets a fish that is low on the food chain that feeds a large number of other commercially valuable fish species that are sought after in the Sitka Sound area-- especially king and coho salmon. The fishery is also controversial because it targets the fish when they are breeding and aborts the unlaidd eggmass inside female fish. All herring that are not females at full-term, or have "mature roe," (generally 10% to 15% of the fish are at full-term with mature roe with the rest being not adequate for the sac-roe product), are by-catch which could be up to 90% of the fish caught. These fish are either discarded, ground-up into fish meal, sold to pig farms, or sold to feed fish farm salmon.

This fishery has been tolerated in the community because of the lucrative Japanese market for Sac-Roe Kazunoko. The community could at least feel somewhat good about harvesting spawning herring because we were supplying a higher-end market of a product that had cultural significance in Japan. That market however has been in decline as population ages in Japan and traditions are changing. (It must be noted that herring eggs also have a tremendous cultural significance in Sitka for Alaska Natives and especially the Kiksadi Clan who have traditionally stewarded the Sitka Sound Herring. Only relatively recently has the Alaska ADFG begun to recognize the cultural significance of herring for Alaska Natives).

As markets for herring change, the community is re-evaluating the herring fishery. The Sitka Sound "biomass" is a remnant herring spawning population/area that once happened throughout all of Southeast Alaska. Now there are only a few places with robust herring spawn after impacts of widespread commercial harvesting and herring rendering operations pre-statehood. With an increased understanding of the uniqueness of the spawning population in Sitka Sound, and the need to conserve this species for the health of the rest of the Sitka Sound Marine ecosystem and fisheries-- and the need to bring herring populations back to their historic levels across Southeast Alaska-- the Sitka spawning herring harvest is being questioned by the community of Sitka and a reevaluation is needed.

The core questions that need to be considered are:

- a) Is this fish more valuable left in the ocean than harvested?
- b) If we are not harvesting the fish for a specialized market, should we harvest it at all?
- c) Is it okay to harvest herring in Sitka Sound to be ground up and used for pig feed, fish food for salmon farming operations, fish meal, rendered product, or protein slurry manufacture?
- d) As the Sitka Sound Herring population increases while the sac-roe market decreases, should the GHF still look to harvest 20% of the total population? Or would the reality be that the majority of those fish harvested (even beyond the 90% bycatch of non-full-term-females with mature eggs,

juvenile fish, and all males) will be destined for other markets that may include fish food for fish farms?

This proposal is written because the proposer believes that herring are indeed more valuable left in the ocean to feed populations of marine life and the fisheries higher up the food chain, and that the Sitka Sound population should be left to increase and hopefully spread to other parts of SE Alaska (Hoonah Sound, Peril Straight, South Baranof, West Chichagof, etc.), and that there should be no scenario where these fish that are low on the food chain should not be used as a base commodity to feed pigs or farmed fish.

**Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.** I have consulted many fishermen, AC members, experts in herring, fisheries specialists, culture bearers, Kiksadi leaders, and community members.

I know that there are many people who think that this cap is too high and should be lower and question if we should even have a herring fishery. This cap has only been exceeded three times in the history of the sacroe fishery since 1980. The Sitka AC and BOF can decide if it is too high and should be lowered to 10,000 tons or 5000 tons or make further recommendations on the fishery.

**PROPOSED BY:** Andrew Thoms (EF-F24-108)

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