

**AMALGAMATED CONSERVATION SOCIETY**  
**1101 MUNRO STREET, VICTORIA, B.C., V9A 5P2**

REPRESENTING THE ANGLING COMMUNITY OF SOUTHERN VANCOUVER ISLAND

January 03, 2019.

Victoria Postlethwaite,  
Pelagics Management Unit,  
Fisheries & Oceans Canada,  
1420 – 401 Burrard Street,  
Vancouver, B.C.,  
V6C 3S4

Dear Ms. Postlethwaite:

The Amalgamated Conservation Society appreciates the opportunity to comment on the management of Pacific Herring. The ACS has operated continuously since 1954 representing angling and salmonid enhancement organizations in the southern Vancouver Island area. Our Society was instrumental in the formation of the Sport Fishing Advisory Board in 1964. We currently have ten member associations representing close to 5000 individual members.

Our member associations operate fish counting fences and the Howard English Goldstream Salmon Hatchery which attempts to maintain and enhance coho, chum and chinook stocks. Our member anglers have experienced the decline in salmonid populations over the decades and the equally serious decline in local herring stocks.

We associate the decline in local herring stocks with the commercial over harvest of herring populations coast wide during the latter part of the twentieth century. This herring roe and reduction fishery resulted in the collapse of most herring stocks. Once thriving populations in the Gorge Waterway and Portage Inlet, as well as Esquimalt Harbour, virtually disappeared.

Herring are a critical food source for chinook and coho salmon and a valuable link in the food chain which supports not only these salmonids but also numerous other fish species. By extension, herring also support the salmon eating resident Orcas and other marine mammal species.

The Amalgamated Conservation Society would like to see the commercial roe/reduction herring fishery curtailed but, at a very minimum, suggest that quotas be reduced by 30% coastwide – to take effect immediately.

Yours truly,

Wayne Zaccarelli,  
Secretary-Treasurer,  
Amalgamated Conservation Society