Sea Shepherd Conservation Society

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Sea Shepherd Conservation Society's Comments to Pacific Fishery Management Council meeting to address management of fisheries for salmon, coastal pelagic species management:

- Pacific sardine

My name is Frank Trinkle. I am the Development Director for the Sea Shepherd Conservation Society.

We must question the logic that permits a commercial fishery on the Pacific sardine off the coast of California. We remind the Council of the recent history of the California sardine fishery. Even if the Council is among those who are still in denial regarding overfishing as the cause of the historic decline and fall of the sardine fishery, no one can deny that extended, excessive fishing at the very least exacerbated the role that natural causes played in that decline.

In conducting your deliberations over the present level of harvest, we commend to the Council's attention the conclusions of the 1998 study by Dr. David Pauly of the University of British Columbia and colleagues at the Center for Living Aquatic Resources Management. This study, cited by marine ecologist Dr. Paul K. Dayton of Scripps as producing the "best data set in the world," concluded that as a result of the ongoing trend of fishing to depletion one fishery after another, we are approaching the bottom of the marine food chain.

We also commend to the Council's attention the forage fish regulations for the state of Alaska that came into effect in February 1998, prohibiting at all times any directed fishing for, or the sale, barter, trade, or processing of nine families of forage fish, with a maximum retainable by-catch of 2% of a vessel's groundfish catch. This measure was taken because these fish -- including herring, smelt, capelin, and sand lance -- are considered "primary food resources for other marine animals and they have the potential to be the targets of a commercial fishery."¹

Fish brokers in California are reporting 250 tons of sardines a day hauled out of the sea off Monterey to feed the fish aquaculture industry in Australia. Seventy years ago, the California legislature was considerably more concerned by non-human consumption of the Pacific sardine than the Council seems to be now. At that time, California passed a law prohibiting the conversion of edible sardines into fish meal. Much ingenuity was expended by industry in finding ways around the human consumption law and protecting the profits of their fish meal reduction operations -- from canneries claiming increasing numbers of sardines unfit for human consumption, to the establishment of sea-going reduction factories beyond the 3-mile limit. Such ingenuity is no longer required; the remnant stocks of California's sardines are going to Australia's fish farms without a murmur of objection. In taking a forage fish out of the ocean and converting it into fish feed, you are potentially jeopardizing wild predator fish to enhance the growth of manufactured fish.

Permitting an ongoing commercial fishery on California's remnant sardine stocks is emblematic of an anti-conservation ethic which is the antithesis of the Alaskan regulation and the fulfillment of the dire model depicted in the Pauly study. In seeking to "confirm or adjust" the 2000 harvest guidelines for the Pacific sardine fishery, which last year reached its highest level in recent history, we see no evidence that the Council has considered whether this fishery should be allowed at all.

¹New Forage Fish Species Category 2-98, Kent Lind, NMFS-Alaska Region