



Governor Deval Patrick
Massachusetts State House
Office of the Governor, Room 280
Boston, MA 02133

Mayor Scott Lang
New Bedford City Hall
133 William Street
New Bedford, MA 02740

Ms. Patricia Kurkul
Regional Administrator
National Marine Fisheries Service
55 Great Republic Drive
Gloucester, MA 01930

April 14, 2011

Dear Sirs and Madam,

Recently you received a letter from Brady Schofield, President of Northern Pelagic Group LLC (NORPEL), a mackerel and herring fishing and processing company, in which he blames the closing of NORPEL's plant in New Bedford, and subsequent loss of jobs, in part on the Pew Environment Group (PEG). I am writing on behalf of PEG to inform you of our activities, goals and concerns about the herring fishery, as this letter presented an incomplete picture of the situation.

About PEG

The Pew Environment Group (PEG) is the conservation arm of the Pew Charitable Trusts. The principal mission of PEG is to strengthen environmental policies and practices in ways that produce significant and measurable protection for both terrestrial and marine systems worldwide. In carrying out that mission, PEG works to advance the frontiers of scientific understanding of the causes, consequences and solutions to environmental problems; design innovative policy solutions to these problems; and mobilize public support for implementing these solutions. PEG has offices in Boston and Harwich.

Why PEG Works to Reform the Management of Atlantic Herring

The Atlantic herring is one of the [most important fish](#) in the waters off of the northeastern United States. These small, nutrient-rich fish are eaten by larger fish we love to catch and eat—tuna, haddock, cod and striped bass. Herring are also food for iconic animals of the Atlantic Ocean like whales, dolphins, seals and seabirds. Coastal communities that depend on commercial and sport fishing, whale watching and tourism need plenty of herring in the water in order for the ecosystem—and their businesses—to thrive.

In the last decade, [fishing for Atlantic herring](#) has changed primarily from small-boat fleets using purse seine gear to [industrial-scale gear](#) called “midwater trawling.” These huge vessels, including those operated by NORPEL, tow massive nets capable of catching hundreds of thousands of pounds of sea life at a time. Industrial fishing by midwater trawlers jeopardizes the health of herring populations with little regard for their impact on ocean life and coastal communities.

For example, each year, large schools of Atlantic herring draw marine predators to the Gulf of Maine for a summer feeding frenzy. In the 1990s, however, when midwater trawlers began fishing for herring on an industrial scale, whale watch boat operators and fishermen noticed fewer whales, tuna and eventually herring. In 2007, fishery managers banned midwater trawlers from fishing inshore during the months of June through September, in order to leave herring for top predators, such as marine mammals, seabirds, groundfish, striped bass and migratory fish like bluefin tuna. Within months, more of these important species—including herring—were observed than had been seen in years.

Harmful impacts on the ecosystem like these prompt PEG to call for better regulation and [monitoring](#) of the trawlers in the herring fishery.

The Herring Alliance

PEG is a founding member of the Herring Alliance (www.herringalliance.org), which is a growing coalition of environmental organizations formed in May 2007 to protect and restore ocean wildlife and ecosystems in the northeast United States. There are currently 38 member organizations representing nearly two million concerned citizens (see attached). The Herring Alliance strives to reform the industrial fishery for Atlantic herring and promotes the following goals:

1. Establish ecosystem-based catch limits that leave enough herring in the ocean for whales, tuna and other marine life that feed on them.
2. Create buffer zones and closed areas to prevent fishing in specific parts of the ocean during critical times of the year in order to protect juvenile and spawning fish, minimize bycatch and ensure herring is abundant when and where it is most needed by predators.
3. Develop a comprehensive monitoring program, including at-sea observers on midwater trawl vessels, so that estimating the herring catch and bycatch of depleted river herring and groundfish, as well as marine mammals is more accurate to better inform sustainable management decisions.

NORPEL’s Letter Misconstrues Decision-making by the Fishery Management Council

The NORPEL letter claimed:

“...starting as early as 2003, the tide turned against us in the regional management (political) arena, and the subsequent loss of fishing access has finally resulted in our decision to cease our operations.”

We can demonstrate these management actions are the direct result of the “Atlantic Herring Campaign” conceived, coordinated and funded by the nonprofit/non-taxpaying Pew Environment Group and their proxies...”

The herring fishery is managed by the National Marine Fisheries Service under a fishery management plan created by the New England Fishery Management Council (NEFMC). The NEFMC is comprised of eighteen individuals, eight of which represent commercial fishing interests, including two that disclose financial interests in the herring fishery. The other ten members are two recreational fishermen, one conservationist, five representatives of New England state governments and a federal government designee. Fishery management plans, and amendments to those plans, are created in an extensive, open public process in accordance with the Magnuson-Stevens Fisheries Conservation and Management Act and the National Environmental Policy Act.

PEG takes part in the New England fishery management process in a manner consistent with those laws and our mission to advance the goals listed above. PEG has promoted solutions consistent with our goals, some of which have had support from the NEFMC and others that have not. Currently, we are working to protect herring as a keystone food species in the marine ecosystem, and to introduce better monitoring and measures to reduce bycatch in the fishery, especially of critically depleted river herring.

Conclusion

Unfortunately, assumptions about the abundance of herring in the late 1990s and early 2000s were overly optimistic, and in addition, the availability of mackerel today has plummeted. It is the need to correct for past assumptions of abundance that lies behind decisions to reform fishing practices for herring, not undue influence by the Herring Alliance or other groups participating in the Council’s public process.

PEG and the Herring Alliance have never called for a shutdown of the herring fishery, but rather are seeking to reform it in ways that are sensitive to the broader ocean ecosystem. By this fall, we hope that some of the most important monitoring and bycatch regulations will come under final consideration – a five-year public process.

Thank you for your attention to this matter and please do not hesitate to contact the Pew Environment Group with any questions, concerns or suggestions.

Sincerely,



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