

**PROPOSAL 209 – 5 AAC 39.212. Forage Fish Management Plan.** Designate Pacific herring as a forage fish, as follows:

5 AAC 39.212. Forage Fish Management Plan is amended to read:

...

(f) For the purposes of this section, "forage fish" means the following species of fish:

...

**(10)Family Clupidae (Pacific herring).**

**What is the issue you would like the board to address and why?** Herring (*Clupea pallasii*) fill the exact ecological niche described in the Forage Fish Management Plan. Herring feed on zoo- and phytoplankton and, in turn, are food for seabirds, salmon, and marine mammals. Herring, especially juvenile herring, are of particular importance to salmon and have been shown to constitute up to 62% of the diets of Chinook salmon (Canada Department of Oceans and Fisheries, 2013).

Ecologically, herring are indisputably forage fish. Pretending, by omission, that they are not is a scientific and legal absurdity. Herring are classified as forage fish by most government agencies, including the United States Geological Survey, the National Oceanic and Atmospheric Administration, the U.S. federal government, and the Alaska Department of Fish and Game (Alaska Research Fisheries Bulletin, 2002). Those agencies acknowledge herring to be critical to the Alaskan food web. In recognition of this, the fishing of herring in federal waters is prohibited and they cannot not be retained as bycatch (Magnuson Stevens Act, 1976).

By contrast, the State of Alaska does not classify herring as a forage fish. Adding herring to the Forage Fish Management Plan would not change or close existing fisheries, but it would bring the State of Alaska in line with scientific evidence, federal policy, practical experience, and official designation.

**PROPOSED BY:** Floyd Tomkins (EF-C15-069)

\*\*\*\*\*

**PROPOSAL 210 – 5 AAC 39.212 Forage Fish Management Plan.** Prohibit directed fisheries on forage fish species, for the purpose of fish meal production, as follows:

5 AAC 39.212 is amended to read:

...

**(f) Directed forage fish fisheries on species listed or exempt from this plan, for the purpose of fish meal production, are prohibited.**

**(g)[(f)]** For the purposes of this section, "forage fish" means the following species of fish:

...

**What is the issue you would like the board to address and why?** Demand for fish meal in the last 10–15 years from expanding agriculture and aquaculture production has tripled prices of fish meal. This increase in demand has significant potential to lead to creation of direct fish meal fisheries on Alaska’s forage fish. Allowing these types of fisheries to be established would; (1) negatively affect Alaska salmon prices, other fisheries that depend on herring, sand lance and smelt as a prey species, and the ecosystem as a whole and (2) be contradictory to Alaska’s position on farmed salmon.

**PROPOSED BY:** Sitka Tribe of Alaska (EF-C15-105)  
\*\*\*\*\*

**PROPOSAL 211 – 5 AAC 39.212. Forage Fish Management Plan.** Prohibit the production of fish meal from whole forage fish, as follows:

5 AAC 39.212. Forage Fish Management Plan is amended to read:

...

**(f) The production of fish meal from whole forage fish, listed or exempt from this plan, is prohibited.**

**(g)[(f)]** For the purposes of this section, "forage fish" means the following species of fish:

...

**What is the issue you would like the board to address and why?** Demand for fish meal in the last 10–15 years from expanding agriculture and aquaculture production has tripled prices of fish meal. This increase in demand has significant potential to lead to creation of direct fish meal fisheries on Alaska’s forage fish. Allowing these types of fisheries to be established would; (1) negatively affect Alaska salmon prices, other fisheries that depend on herring, sand lance and smelt as a prey species, and the ecosystem as a whole and (2) be contradictory to Alaska’s position on farmed salmon.

**PROPOSED BY:** Sitka Tribe of Alaska (EF-C15-106)  
\*\*\*\*\*