

Herring are not listed or managed as a forage fish in Alaska. If they were listed as such, they would not be able to be taken at all, as regulated by the following policy:

Title 5. Fish and Game

Chapter 39. Transportation, Possession and Release of Live Fish; Aquatic Farming

Section 212. Forage Fish Management Plan

5 AAC 39.212. Forage Fish Management Plan

- (a) This management plan governs the commercial harvesting of forage fish species in the waters of Alaska.
- (b) The board finds that forage fish perform a critical role in the complex marine ecosystem by providing the transfer of energy from the primary and secondary producers to higher trophic levels. The higher trophic levels include many commercially important fish and shellfish species. Forage fish also serve as important prey species for marine mammals and seabirds.
- (c) The board finds that abundant populations of forage fish are necessary to sustain healthy populations of commercially important species of salmon, groundfish, halibut, and shellfish.
- (d) Except as otherwise provided in 5 AAC 03 - 5 AAC 39, *forage fish may not be commercially taken*.

Though they are not listed as forage fish in Alaska, Herring are listed as a forage fish by the North Pacific Research Board, Fisheries and Oceans Canada, the Washington Department of Fish and Wildlife, and by the British Columbia Ministry of Environment.

Indeed, even ADF&G staff seem to acknowledge that herring ought to be considered a forage fish. On page 102 of the ADF&G staff comments for this year (RC2), ADF&G staff offer the following: "Most fishery scientists agree that herring and forage fish in general are important links in marine food webs, serving as prey for many species." This quote frames herring as a forage fish.

This near-consensus regarding herring as a forage fish demands heightened conservation measures for herring, suggesting the passage of proposal 98 or 99.