

Bruce Schactler  
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Chairman John Wood  
Alaska Board of Fisheries  
October 1, 2024

Re: CFEC Recommendation for Herring Revitalization Committee Plan (RC024)

The change to herring management in the Kodiak Herring proposal is needed, as the sac roe market continues to decline to nearly just a footnote in Alaska fishing history.

The options and direction for such underutilized Alaska herring, management must change to allow significant harvest to take place when the herring are past their spawning phase, and into the high fat or a better/different stage of life when the fish's nutritional profile is compatible to other uses of this valuable State of Alaska resource!

SOA management and the massive investment associated with the effort to harvest herring for the Roe market has dominated all other aspects of the Alaska herring fishery. However, the vast majority of the Alaska herring fishermen have been put out of business by the crash of the Japanese roe market, stranding equipment and investment and harvestable resources. Until potential new producers and associated new markets have specific raw product access, through new a management scheme, there can be no realistic planning or needed new investment for new wild Alaska Herring products and their associated markets.

Appropriately, the SOA has begun to address this change in small ways, such as the removal of the word "roe" in the fishery description relative to the Togiak (Bristol Bay) fishery.....it is now, simply the Togiak Herring Fishery. Additionally, SOA Administrations and the SOA Legislature have advocated, supported and called for major change and new development of the Alaska herring fishery continuously for the last 20 years. This support includes significant SOA financing for research, development, equipment and marketing.

The Alaska Seafood Marketing Institute (ASMI) is actively making markets aware of our herring resources thru domestic and international program activities, including nutritional studies showing the significant benefits of eating herring. Additionally, Alaska herring now has an official "specification" in the USDA for potential use as a canned product in their multi-billion dollar domestic and export food aid programs.

1). <https://www.alaskaseafood.org/species/herring/>

2). [https://www.alaskaseafood.org/wp-content/uploads/210808\\_Blding-Evidence-Can-Herring.pdf](https://www.alaskaseafood.org/wp-content/uploads/210808_Blding-Evidence-Can-Herring.pdf)

3). [https://www.alaskaseafood.org/wp-content/uploads/Liberia\\_HerringReport\\_10\\_13\\_15-1.pdf](https://www.alaskaseafood.org/wp-content/uploads/Liberia_HerringReport_10_13_15-1.pdf)

4). [https://www.alaskaseafood.org/wp-content/uploads/210808\\_Uganda\\_1pg.pdf](https://www.alaskaseafood.org/wp-content/uploads/210808_Uganda_1pg.pdf)

5). [https://www.alaskaseafood.org/wp-content/uploads/161020\\_Herring-Recipe-book-6-Final\\_5.5x8.5-Copy.pdf](https://www.alaskaseafood.org/wp-content/uploads/161020_Herring-Recipe-book-6-Final_5.5x8.5-Copy.pdf)

**With the recent request you all have just received from CFEC, that suggests a process to figure this out, I urge you all to support the CFEC request in your 2024/2025 meeting cycle notice due April 10, with a corresponding general topic notice of Herring Restructuring, rather than a specific proposal request..... Additional public comment past what was heard on proposal 57 at the 2024 Kodiak meeting would only be redundant. A group tasked to figure it out, but within the BOF authority of deliberation is sure to be much more productive.**

I will also suggest that this group be kept reasonably small, being made up of:

2 Board of Fisheries members,  
3 or 4 fishermen,  
1 processor,  
CFEC commissioner and  
Director of Commercial fisheries, or his designee

Everything is in play and the table is set for Wild Alaska herring to realize a different place in the State and world market place....all that is left to realistically move forward, is access to the needed raw product, and that will happen with the restructuring of the Alaska herring resource.

Bruce Schactler  
Kodiak, Alaska

