

COASTAL PELAGIC SPECIES MANAGEMENT TEAM REPORT ON
FISHERY MANAGEMENT PLAN AMENDMENT – KRILL

The Coastal Pelagic Species Management Team (CPSMT) heard a presentation from Mr. Svein Fougner on the draft environmental assessment, regulatory impact review and regulatory flexibility analysis for Amendment 12 to the CPS FMP. The Team commends the NMFS, SWR, Mr. Fougner and Ms. Susan Smith for preparing a very comprehensive and informative document. Of the proposed alternatives contained in the draft, members of the CPSMT were unanimous in their support of Alternative 2 for regulating krill harvest in the EEZ. The CPSMT agreed that a precautionary approach at this time is best supported through a prohibition on krill harvesting (i.e., OY=0) in the EEZ, and favored creation of the “prohibited harvest” category in the Coastal Pelagic Species (CPS) Fishery Management Plan (FMP). Alternative 2 recognizes the ecological importance of krill to many marine predators and the lack of a historical directed krill fishery along the west coast and is consistent with current state regulations prohibiting the landing of krill in Washington, Oregon, and California and the initial request to the Council to consider prohibiting krill harvest in the EEZ.

The CPSMT expressed concern about the lack of flexibility in Alternative 2, particularly with regard to recognizing a potential mechanism for moving krill out of the “prohibited harvest” category in the future. The CPSMT felt that there could be a less protracted means for achieving this than through further amending the FMP (e.g., establishing a research program under Alternative 2 to determine the viability of a krill fishery.) By precluding the potential for the development of a fishery for krill, the CPSMT viewed Alternative 2 as being inconsistent with conventional fishery science theory/application, in that the relatively high biological productivity of krill makes it more suitable for exploitation compared to other species being targeted under Council managed fisheries that are currently in operation.

Although infeasible at this time, the CPSMT liked the flexibility that Alternative 3 offers, while protecting the krill resource in the short run (i.e., OY=0), or at least until there is sound scientific basis for developing a sustainable, low-risk krill fishery. However, including krill in either of the existing CPS FMP management unit categories (actively managed or monitored) would require establishing a management framework and number of biological reference points (e.g., MSY, overfishing threshold, etc.) for krill in the CPS FMP at the outset. These reference points would be very difficult to calculate with any degree of precision, given the existing biological information for krill (e.g., the need for better biomass estimates that capture the full range of uncertainty) and ultimately, would be provisional at best. This requirement introduces a high initial overhead and could jeopardize approval of the Amendment (e.g., the CPS FMP experience with squid).

Finally, the CPSMT further recommends that under any of the Alternatives, it is critical that Amendment 12 provide for the incidental catch of krill in other fisheries.

PFMC
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