

HIGHLY MIGRATORY SPECIES MANAGEMENT TEAM REPORT ON
EXEMPTED FISHING PERMIT (EFP) APPLICATIONS FOR
HIGHLY MIGRATORY SPECIES

The Highly Migratory Species Management Team (HMSMT) focused its discussion on the proposed pelagic longline exempted fishing permit (EFP) submitted by Pete Dupuy, as our comments on the drift gillnet EFP were described in our report under Agenda Item J.3. The HMSMT would like to offer the following comments on the process and timeline and management issues of the longline EFP.

Process and Timeline

The approval of the longline EFP would require the development of an Environmental Assessment (EA), which would contain analyses of the alternatives. Therefore, the HMSMT recommends that the Council indicate whether to move forward with consideration of a longline EFP at this meeting. If the Council decides to move forward, then the HMSMT would develop an EA, which analyzes two alternatives—no action and the proposal described in the EFP application with delivery at the Council's September meeting for final approval. If the Council chooses to adopt the EFP alternative, then National Marine Fisheries Service (NMFS) would begin the Section 7 consultation process (which takes approximately three months). The HMSMT notes that, while the interim EFP protocol was followed to facilitate implementation in 2006, given these time constraints, the longline EFP could not begin this fall (as proposed in the application), but could occur in 2007.

If the Council decides at this meeting to not move forward with the longline EFP, then the HMSMT would not develop an EA and the Council's action would be considered final.

Number of Participants

The HMSMT notes the longline EFP would have one participant who proposes to take four trips, and expressed concern about the small sample size. The EFP applicant had previously proposed this EFP with a higher level of effort (i.e., 10 vessels). At that time, there was concern expressed about the high amount of effort and a suggestion was made that the applicant reapply and limit the EFP to only 1-2 participants.

The EFP applicant indicates that, in the future, he would like the longline EFP to be expanded to provide fishing opportunity for current drift gillnet holders to switch over to longline gear. To better assess whether to move in this direction, an experimental design could be developed to facilitate a comparison of drift gillnet and longline bycatch levels.

Protected Resource Issues

The HMSMT examined the NMFS observer data from the Hawaii-based longline fishery (see Attachment 1) and notes that the anticipated level of protected species interactions are higher than those presented in the EFP application, particularly for leatherback sea turtles.

Biological Issues

The HMSMT would like to point out that, under the EFP, catches of bigeye, yellowfin, and albacore tuna would likely occur. The Inter-American Tropical Tuna Commission has adopted resolutions to address potential overfishing on these stocks, and NMFS is in the process of addressing bigeye overfishing and has also indicated that increased U.S. effort on albacore would not occur.

Suggested Revisions

If the Council decides to move forward with consideration of a longline EFP, then the HMSMT recommends that harvest limits (i.e., caps) be considered for protected species, marine mammals, and other species, as appropriate.

HMSMT Recommendations:

1. Decide whether to approve the longline EFP:
 - a. If yes, then direct the HMSMT to develop an EA and schedule final Council action for September.
 - b. If no, then this would be considered as the Council's final action.

PFMC
03/09/06

NMFS Criteria for assessing marine turtle post-interaction mortality after release from longline gear. Percentages are shown for hardshelled turtles, followed by percentages for leatherbacks (in parentheses). Taken from the 2005 biological opinion on the continuatin of the Hawaii based pelagic, deep set, tuna longline fisheries based on teh FMP for the Pelagic Fisheries of the Western Pacific Fisheries of the Western Pacific Region.

Nature of Interaction	Released with hook and with line greater than or equal to half the length of the carapace	Release with hook and with line less than half the length of the carapace	Released with all gear removed
Category	Hardshell (Leatherback)	Hardshell (Leatherback)	Hardshell (Leatherback)
I Hooked externally with or without entanglement	20 (30)	10 (15)	5 (10)
II Hooked in upper or lower jaw (not adnexa ¹) with or without entanglement	30 (40)	20 (30)	10 (15)
III Hooked in cervical esophagus, glottis, jaw joint, soft palate, or adnexa (and the insertion point of the hook is visible when viewed through the mouth) with or without entanglement	45 (55)	35 (45)	25 (35)
IV Hooked in esophagus at or below level of the heart (includes all hooks where the insertion point of the hook is not visible when viewed through the mouth) with or without entanglement	60 (70)	50 (60)	n/a ²
V Entangled Only	Released Entangled 50 (60)		Fully Disentangled 1 (2)
VI Comatose/resuscitated	n/a ³	70 (80)	60 (70)

Table 33. Criteria for assessing marine turtle post-interaction mortality after release from longline gear. Percentages are shown for hardshelled turtles, followed by percentages for leatherbacks (in parentheses).

¹ Subordinate part such as tongue, extraembryonic membranes

² Per veterinary recommendation hooks would not be removed if the insertion point of the hook is not visible when viewed through the open mouth.

³ Assumes that a resuscitated turtle will always have the line cut to a length less than half the length of the carapace, even if the hook cannot be removed.