

SCIENTIFIC AND STATISTICAL COMMITTEE STATEMENT ON
PREPARE COMMENTS ON PROPOSED CHANGES TO NATIONAL STANDARD
GUIDELINES 1, 3, AND 7

The SSC was briefed by Dr. Wes Patrick on the proposed revisions to National Standards (NS) 1, 3 and 7, as well as the general section of the National Standards. The proposed revisions address several of the SSC's early comments on modifications to the Magnuson Stevens Act (MSA) (Supplemental SSC reports: Agenda Item A.4, April 2013; Agenda Item H.1, September 2013). However, the revisions do not address issues such as the 10-year maximum rebuilding time because these issues are recommended to be implemented in the MSA for the next re-authorization.

While the proposed revisions should introduce additional flexibility into management decision-making, there is a danger that decision-making could become substantially more complicated without additional guidance. For example, three alternative definitions are provided for how to calculate the maximum time to rebuild overfished stocks (T_{MAX}). However, no guidance is provided on who would choose among the options and how the choice should be made.

Management of groundfish complexes involves computing overfishing level (OFL) and acceptable biological catch (ABC) components for each stock within the complex and summing these to compute an OFL and ABC for the complex. The SSC was advised by Dr. Patrick that management of a stock complex could be informed by an indicator stock that is not part of the complex. The SSC recommends that the guidelines specifically include this possibility.

The proposed revisions attempt to address the Council's concern regarding stocks mistakenly determined to be overfished. However, the proposed guidelines refer to whether the stock was overfished in the year when the stock was originally declared overfished. This may be an inadequate guideline given that the years in which a stock was overfished may change between assessments. The SSC recommends that a wider set of years be used when deciding whether to discontinue a rebuilding plan. In addition, consideration should be given to discontinuing a rebuilding plan only if two consecutive assessments confirm that the stock was mistakenly determined to be overfished.

The proposed guidelines include several data-poor methods for determining Annual Catch Limits (ACLs). The SSC agrees that there is need for additional methods for setting ACLs in data-poor situations, particularly when estimates of catch are highly uncertain. The SSC recommends that the guidelines should be expanded to include other methodologies (e.g., spatial closures and empirical CPUE methods) if analyses, such as management strategy evaluations, show that they can achieve management goals.

The SSC notes that the definition of overfishing in Section e.2.i.B. (fishing mortality $> F_{MSY}$) conflicts with that in Section e.2.ii.A.2 (catch exceeding the OFL) in the proposed revision to NS1 guidelines. An alternative term should be developed for one of these two terms to avoid confusion.

The definitions of overfished and depleted should be revisited in Sections e.2.i.E. and e.2.i.F in the proposed revision to NS1 guidelines to ensure they are clearly delineated either as exclusive terms or with one as a subset of the other. Defining a stock as depleted only if there was no overfishing in two generation times, which may be more than 100 years for many rockfish species, can be unduly restrictive.

In relation to the SSC's previous comments on revisions to the NS Guidelines and the MSA, the proposed revisions do not include:

- a transboundary stock rebuilding exception;
- an exception for rebuilding provisions for short-lived as well as annual species; and
- making the mixed stock exemption operational, and providing guidelines for the biological and economic analyses needed for justifying its application.

The SSC recommends that guidelines be expanded to address these issues.

PFMC
04/13/15