

HIGHLY MIGRATORY SPECIES ADVISORY SUBPANEL REPORT ON SWORDFISH  
MANAGEMENT AND MONITORING PLAN HARDCAPS

The Highly Migratory Species Advisory Subpanel (HMSAS) supports and would like the Council to recognize the following statements made by the Pacific Offshore Cetacean Take Reduction Team (POCTRT) in the NMFS Report under this Agenda Item.

“The Council’s Preferred Alternative proposes permanent hard caps, without consideration for future adaptive management such as changes to marine mammal populations, permit latency, or their identification/integration with long term management goals for the fishery.”

“The Council does not explain how hard caps would reduce bycatch of protected species, or by how much. There is no explanation of why they are needed in addition to the measures that result from the POCTRT process, or, why they would be an improvement.”

“The Council’s proposal lacks a mechanism to modify the caps when estimates of [potential biological removal] PBR or serious injury and mortality change.”

“Although the Council’s stated goal is the reduction of bycatch in general, the Council’s proposal does not demonstrate how the caps would achieve that goal or how it would specifically reduce marine mammal bycatch in the long run.”

The HMSAS believes that there is the possibility of more interactions with marine mammals in the future due to the fact that many of these populations are increasing because of successful management measures that are now in place in the drift gillnet (DGN) fishery.

The HMSAS is concerned that the Council’s preliminary preferred alternative (PPA) and the California Department of Fish and Wildlife (CDFW) PPA will penalize the very same fishermen who were directly involved with and partly responsible for these success stories.

The HMSAS feels very strongly that adaptive management is crucial in this fishery due to the many complexities involved. The POCTRT has a proven track record of success using a model that allows for adaptive management. The Council does not have a similarly successful track record with respect to reducing bycatch according to the POCTRT. For these reasons the HMSAS believes status quo is the way to go regarding the future management of the DGN fishery. The HMSAS does not support hard caps as they are not based on the best available science.

We support increasing the domestic supply of responsibly managed seafood. We believe this goal should remain a high priority. The goal will allow coastal communities to increase the fresh, healthy, and domestic seafood supply. The exempted fishing permits (EFPs) are the means to reach the objectives of this goal. Also, it affords an opportunity for young fishermen to enter and sustain the swordfish fishery. Without an economically viable fishery, consumers will be denied the opportunity to consume fresh U.S.-caught swordfish. Foreign imports (which are not as well regulated) will continue to rise. The rise in foreign imports will lead to increasing the transfer effect, which is described as foreign fleets harvesting at higher bycatch levels.