

GROUND FISH ADVISORY SUBPANEL REPORT ON
UNMANAGED FORAGE FISH PROTECTION INITIATIVE

The Groundfish Advisory Panel (GAP) heard a presentation from Mr. Mike Burner on the Forage Fish Initiative and reviewed the draft Environmental Assessment on this topic.

The GAP recommends the Council reaffirm its preliminary preferred alternative, Alternative 2, as the appropriate means to protect unmanaged forage fish. Further the GAP believes the Environment Assessment is ready for distribution for public review and comment. Lastly the GAP believes the proposed language for Council Operating Procedure 24 sets out an appropriate process for considering exempted fishing permits.

GAP members are committed to protecting unmanaged forage fish and we recognize that forage fish are an important ecosystem component for groundfish and other federally managed fisheries. Various groundfish fisheries have historically caught incidental amounts of these forage fish species. Table 3.3.5 from the EA enumerates these minimal catches over the last decade.

The GAP does not support Alternative 1, the no option alternative, as it does not meet the intent of the Council and stakeholders to protect unmanaged fish.

Similarly, the GAP does not support Alternative 3, which prohibits the retention of several forage fish species. Alternative 3 treats forage fish species as “in the fishery” versus “ecosystem component” species by applying specific management measures to prohibit retention. This is an inappropriate classification according to National Standard 1 guidelines. Further this alternative will negatively affect existing fisheries with no real benefit to conservation and biology. If all groundfish fisheries are required to sort at-sea and discard these species it will pose an enormous burden on the industry – particularly the whiting fleets who do not currently sort fish at-sea but rather put the fish into the hold as quickly as possible in order to immediately chill the harvest. Alternative 3 would not only be disruptive to fishing operations, in the case of whiting it would result in a degraded product that does not meet the requirements of the market.

There has been some discussion in public comment to the Council about limiting the amount of bycatch under Alternative 2. The GAP strongly opposes this approach for essentially the same reasons we oppose Alternative 3. This approach would clearly impose additional burdens and costs on the fleet without any biological benefit.

The GAP supports the Statement of Purpose and Need developed for this initiative. We believe that Alternative 2 as described in the EA is the most appropriate means of meeting the Council’s goal to protect unmanaged forage fish without disrupting or hurting existing target fisheries.