The Scientific and Statistical Committee (SSC) discussed the findings of Managing Our Nation’s Fisheries 3 (MONF3). The discussion focused largely on issues identified by Pacific Council staff as Council priorities (Attachment 2). SSC comments regarding the scientific merit of some of these issues are as follows:

**MONF3 Session 1**
- **Revise rebuilding time requirements:** The SSC agrees that this change to determining maximum rebuilding time will reduce the impact of uncertainty in projections and also make rebuilding time requirements depend solely on the biology of the stock.
- **Do not hold stocks mistakenly designated as overfished to rebuilding provisions:** The SSC supports this recommendation. A high degree of confidence that a stock was never overfished should be required, so as to avoid having to subsequently re-declare a stock as overfished.
- **Transboundary stock rebuilding exception:** This is a reasonable provision that should be accompanied by a clear definition of what constitutes a “transboundary stock.”
- **Clarify Congressional intent regarding needs of fishing communities:** It is not clear what type of clarification is needed from Congress. If clarification is needed regarding what constitutes needs of fishing communities, such details may be better addressed via guidelines rather than by legislative fiat. Such guidelines could encourage national consistency regarding how community needs are considered in rebuilding decisions, as well as provide some regional flexibility in how those needs are defined.
- **Extend annual species exemption to short-lived species:** This is a reasonable provision that should be accompanied by a clear definition of what constitutes a “short-lived species.”
- **Carryover exception:** A carryover exception of this type would increase management flexibility and provide additional harvest opportunity at little biological cost.
- **Use of adaptive management for data-poor species:** “Adaptive management” is an operationally nebulous term. A clear definition of adaptive management and how it would be applied in this particular context is required for this provision to be considered for inclusion in the Act.

**MONF3 Session 2**
- **Address rebuilding requirements when environmental conditions may be predominant factor in stock’s decline:** Distinguishing the effects of environmental versus other factors on a stock’s decline can be difficult.
- **Link ecosystem-based management (EBM) scales to fisheries management and governance:** The implementation of this would require definition of EBM scale that is currently unavailable and would require substantial research to operationalize.
- **Establish national standard for adequate forage base:** Determining what constitutes an “adequate forage base” would require considerable resources and time for data collection, modeling, and regulatory implementation. Any incorporation of forage base considerations in the Act should be incremental.
• Consider impact of forage fish to ecosystem and fishing communities: Considering impacts of forage fish would require considerable time and scientific and regulatory resources. The Council is already examining some of these issues for Pacific Sardine. Forage fish impacts (like adequate forage base) should be considered in the Act in terms of incremental progress toward achievable objectives.

MONF3 Session 3
• Expand cooperative research: There are many cooperative research programs on the West Coast; the SSC sees the benefits of such research. However, given that cooperative research is already mandated in Section 318 of the Act, it is not clear why expanding the program would require a change to the Act. It is important that cooperative research not be mandated in a way that compromises existing comprehensive, standardized data collections that are being used for assessment and management.

• Expand public reporting of some currently confidential data: Public reporting would enable analysis by a wider community of scientists

MONF4 Session 4
• Replace term “overfished” with “depleted”: “Depleted” is a more accurate and comprehensive term than “overfished,” as not all incidents of depletion are due to overharvest.

PFMC
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