

COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON UNMANAGED FORAGE FISH PROTECTION INITIATIVE

The Coastal Pelagic Species Advisory Subpanel (CPSAS) and Coastal Pelagic Species Management Team (CPSMT) convened a joint conference call on September 12th to review and discuss the Ecosystem Based Management agenda items for the September Council meeting. We did not have the opportunity to discuss agenda item H.1 (Follow-up from Managing Our Nations Fisheries Conference); however, the CPSAS notes there is a potential intersection and overlap of topics for MSA reauthorization and the Council's current work under FEP Initiative 1: protections for unfished and unmanaged forage fish. The majority of the joint meeting was focused on Agenda Item I.2.b (Supplemental Ecosystem Workgroup Report). We appreciate the Council's consideration of these comments.

The CPSAS has considered at length how to address currently unfished and unmanaged forage stocks, and has reviewed numerous items over time regarding unmanaged "forage" species. We call the Council's attention to our earlier statements (the most recent at Agenda Item G.1.b., Supplemental CPSAS Report, June 2012). The CPSAS acknowledges the importance of conserving forage species due to their contribution to ecosystem function. We support requiring scientific evaluation before allowing development of commercial fishing for unmanaged stocks.

In June 2013, the Council dissolved the Ecosystem Plan Development Team (EPDT) and formed the Ecosystem Workgroup as an ad hoc committee to develop recommendations on the federal list of fisheries and develop the Fisheries Ecosystem Plan (FEP) Initiative 1. The Council requested that the Workgroup define a list of unmanaged forage species, building on Appendix A of the FEP. Further study into food habits of Council-managed species and bycatch of forage species in Council-managed fisheries is essential to better understand how this action could affect fisheries, communities and the marine ecosystem. It is worth noting that CPS advisory bodies previously reviewed the list of unmanaged forage species in Appendix A of the FEP (November 2011 Briefing Book Agenda Item H.2.a, Attachment 1). None of the unmanaged species listed in Appendix A are part of any current CPS fishery.

Regarding Agenda Item I.2.b, the Ecosystem Workgroup Report on the Unmanaged Forage Fish Protection Initiative, the CPSAS would appreciate the Council's consideration of the following recommendations:

1. Initiate a participatory process to refine this list of unmanaged forage fish

The CPSAS agrees with a Workgroup request for additional clarification on the scope of forage species to be considered in this initiative. As such, we support the process of scientific review proposed by the Ecosystem Workgroup and encourage further council discussion and guidance on the definition of "forage fish". As recommended by the Ecosystem Workgroup, the CPSAS also supports clarifying the definition of "unmanaged" as it pertains to this initiative.

2. Include a representative from the relevant advisory bodies to participate in the FEP Initiative 1 process. The Ecosystem Workgroup is requesting a mechanism for bringing needed scientific expertise into this process. The CPSAS strongly supports this request,

including both adding persons with scientific expertise to the Workgroup AND arranging a workshop, as described in the Workgroup report (page 4, bullet 2).

As noted on page 8 of the Workgroup report, *"amendments to one of more FMPs will necessarily require tight coordination with other Council Advisory bodies."* The CPSAS therefore recommends including formal representation from the CPSAS, CPSMT, as well as other advisory bodies, as appropriate in the Initiative 1 process. Advisory representation in this process will allow for more timely input and review of proposed changes, especially if the meeting schedules for the advisory bodies and workgroup do not align.

3. Proposed Process and Timeline. The Ecosystem Workgroup Report (page 3) noted that in light of the Council's potential action under Agenda Item I.1, to adopt an updated List of Fisheries, it is "highly unlikely that new fisheries for forage species could begin without prior Council authorization". This finding echoes earlier comments from industry, and provides time for the Council to conduct a thorough and step-wise process. The CPSAS therefore supports the general process proposed, with timing of the workshop and completion of proposed work determining the schedule of future Council meetings.

Thank you for your consideration of these comments.

PFMC
09/16/13