

COASTAL PELAGIC SPECIES MANAGEMENT TEAM REPORT ON
UNMANAGED FORAGE FISH PROTECTION INITIATIVE

The Coastal Pelagic Management Team (CPSMT) reviewed the Ecosystem Workgroup (Workgroup) supplemental report (Agenda Item I.2.b) and offers these comments for the Council's consideration.

The CPSMT notes that the Workgroup proposes a purpose and need statement for Council review and comment. This initial draft of the purpose and need statement focuses on prohibiting new directed fishing on currently unmanaged and unfished forage fish species in the U.S. West Coast Exclusive Economic Zone (EEZ), absent the opportunity for scientific evaluation. The CPSMT supports this draft statement as it frames the issue consistent with the Council's interest in managing forage fish relative to fishing.

The CPSMT agrees with the need to further refine the list of forage fish to be included in Fisheries Ecosystem Plan (FEP) Initiative 1. As the Workgroup report points out, the list was a preliminary effort to identify key species for potential inclusion in Council fishery management plans (FMPs). The Workgroup asks whether the list of forage fish might be expanded to include a broader representation of forage fish species (other than pelagic); and whether the purpose of the action is only to provide an opportunity to review forage fish species as potential new fisheries or to also provide protection to forage fish species not likely to support fisheries but that are important to the greater marine ecosystem as prey to non-FMP species. For action under Initiative 1, the CPSMT recommends the list focus on pelagic, schooling forage fish (i.e. Smith et al. 2011) with connections to one or more FMP species or that are prey to non-FMP EEZ species to address broader ecosystem needs.

The Workgroup requests help from the Council in defining "unmanaged" and "unfished." At present, it is not clear whether the term "unmanaged" should be applied to forage fish species that are caught but not subject to state fishery regulations or whether the term applies if a species is regulated under one or two state's fisheries programs but not all three. The Workgroup intends a thorough review of state policies. For this review, the CPSMT suggests that forage fish species be considered unmanaged if not already subject to regulations by states or tribes as a "working" definition. Similarly, the CPSMT suggests that the term "unfished" should include those species that might be reasonably expected to be taken in a fishery either as target or non-target stocks which are not currently encountered.

Finally, the Workgroup highlighted the need for additional expertise and close coordination with advisory bodies as it proceeds with "next steps." If the Council chooses to use a workshop process to further develop the list of forage fish species, the CPSMT requests that workshop participants include representation by advisory members not already members of the Ecosystem workgroup.