

## GROUND FISH MANAGEMENT TEAM STATEMENT ON GROUND FISH STRATEGIC PLAN

The GMT believes the draft strategic plan document is a significant step towards resolution of a number of fundamental issues plaguing the west coast seafood industry and the Council's efforts to manage the groundfish fishery. The GMT recognizes how difficult it is to envision better conditions for the groundfish fishery when harvest levels and fishing revenues are declining rapidly. The GMT believes a vision statement must be realistic as well as optimistic, and the current draft generally strikes a reasonable balance. The GMT enthusiastically endorses the committee's efforts and offers the following suggestions to improve the document before it is distributed for public review and comment. Because of the limited time available for review, these comments focus on the content of the executive summary. However, the Team will endeavor to compile a set of comments pertaining to the full document in time for the Committee's August meeting.

1. The Fishery - The GMT recommends rewording the first sentence to read, "...where Pacific groundfish stocks are healthy, ~~resilient~~ well understood, and...", since the resilience of stocks is beyond our control. The GMT interprets the fishery vision statement as meaning the commercial fishing sector will be much smaller than today, and this restructured industry, as opposed to the "environment", will be "diverse, stable, market-driven, profitable and adaptive." The basic operating environment will likely be substantially different: marine protected areas, bycatch restrictions, habitat protection, record-keeping and monitoring will all be basic features of the business. The vision statement currently appears to focus only on the commercial sector, and that should be made clear by inserting the word "commercial" before each reference to the industry or fishery. The vision statement should be expanded to address the recreational sector, perhaps with reference to "quality recreational experience and participant satisfaction." Does the Council envision an end to open access to the recreational fishery? If so, that should be specifically mentioned. Reference to the resolution of allocation disputes should include ensuring that management mechanisms are available to achieve those allocations.

2. The Science - The GMT envisions the quality of scientific information and analysis meeting or exceeding national and international standards. Economic information and analysis should be included in this vision and suggests the following insertion: "Data collection and monitoring programs (will) provide ~~stock assessments,~~ biological, environmental, economic and social assessments and analyses with acceptable levels of uncertainty..."

3. The Council - The GMT believes it is important that the Council must be decisive in its actions and decisions.

With the "Vision" section's focus on describing a future in which major problems have been resolved, it is not always well-suited to identifying the guiding principles that will shape a difficult and extended transformation. The GMT believes the summary would be improved by inserting a statement between the "Vision" and "Implementation" sections of the document encapsulating the principles or priorities that will guide the transition from the current fishery to one that reflects the vision.

In Section II "What will we do to get there?", the GMT offers the following comments.

### 1. Management Policies Recommendations

(b)3: As noted above, making "the necessary allocation decisions" must include provision for ensuring they can be achieved, or the allocations themselves will be meaningless and will not improve predictability.

(b)4: Revise first sentence: "To reduce federal management complexity..."

2. Harvest Policies - (b)1: the GMT reminds the Council of the distinction between harvest guidelines (closure is optional but not mandatory) and quotas (closure is mandatory). If this recommendation is adopted, OYs will be considered quotas or limits, and this should be clearly stated.

(b)2: The first sentence conveys the impression that the biological information base will decrease over time. The GMT suggests this sentence be clarified by replacing the first sentence with "In cases where stock biology, health, or total fishing mortality are poorly understood, allowable harvests must reflect a greater degree of precaution."

(b)4: The GMT requests clarification about the meaning of "closure of the *fishery*" in the first sentence. Also, the GMT believes the last sentence may reflect a more conservative policy than currently expressed in the FMP. And although possible use of the mixed-stock exception is mentioned earlier in the paragraph, the last sentence implies that it would never be invoked in cases where the weak stock is less than half of Bmsy. If this is the intention, it should be stated clearly.

(b)6: While the intent to conserve the portion of transboundary stocks under the Council's authority, in the absence of international agreements, is laudable, it is not clear how management performance can be meaningfully evaluated in cases where stocks--or our measurements of them--exhibit a high degree of variability in distribution across national boundaries. For example, in the last four triennial trawl surveys, the percentage of estimated yellowtail rockfish biomass attributed to the Canadian portion of the assessment area has alternated between roughly 17% and 40%.

3. Capacity Reduction - (a), (b)1, and b(2): If the goal is to reduce overcapacity as quickly as possible "to a level consistent with the allowable harvest levels for the 2000 fishing year", the option of mandatory permit stacking should be included in the discussion.

(b)1: If permit stacking is pursued for the fixed gear sector, the GMT believes a rockfish endorsement should be considered concurrently. At a minimum, the industry should be alerted to the possibility of a rockfish endorsement so that transfer prices for stacked permits can more accurately reflect their future value. Although this paragraph clearly states a policy with regard to stacking's interaction with the daily-trip-limit fishery, the effect on rockfish limits is not addressed here or in subsequent discussion of stacking for the trawl fleet.

(b)6: Since the groundfish mortality of a "C" permit fleet would result, to a great extent, from vessels participating in fisheries for which the Council does not have management plans, it is not clear how the Council will "manage each sector to stay within its allocation each year."

#### Intermediate to Long Term

1: As with stacking, there is no mention of ITQ development for fixed-gear with respect to rockfish.

2: As noted previously, it should be stated clearly that an integral part resolving allocation issues between these sectors is the development of mechanisms that facilitate accountability and control of fishing mortality in both of them.

4. Allocation, General Allocation Principles - 1. The GMT is uncertain about implementation of point #1. It is clear that equitable does not necessarily mean equal, but without active inseason management of recreational and incidental non-groundfish fisheries, the directed groundfish fisheries will have to shoulder most of the conservation burden. This appears to conflict with the goal of predictability.

3. As with point 1 above, this seems to conflict with predictability.

5. The GMT believes the Council has expressed a preference that fishing sectors and individuals be accountable for their own bycatch and discard. As more specific bycatch information becomes available, this issue becomes clearer. The GMT has followed this principle in calculating limited entry and open access allocations in recent years by applying a discard factor only to the limited entry catch. The GMT suggests this allocation principle be revised as follows: "Allocations should be based on the acceptable biological catch, and each sector that receives an allocation should be responsible for reducing its bycatch. If there is no observer program to quantify bycatch/discard amounts, each allocation should be reduced to account for assumed discard."

6. The GMT advises the Council that significant capacity reduction will necessarily result in concentration of benefits and costs. The goal should be to avoid **excessive** concentration.

#### 5. Observer Program Recommendations

(b)5: The GMT continues to strongly support the development of a comprehensive observer program. However, consideration of alternative monitoring approaches should not be restricted to only vessels with limited abilities to carry observers, but evaluated generally with respect to cost and reliability of information.