

HIGHLY MIGRATORY SPECIES ADVISORY SUBPANEL STATEMENT ON
DRAFT FISHERY MANAGEMENT PLAN DEVELOPMENT

The Highly Migratory Species Advisory Subpanel (HMSAS) met with the co-chairs of the Highly Migratory Species Plan Development Team (HMSPDT) and reviewed the HMSPDT's progress report on development of revisions to the HMS fishery management plan (FMP). The HMSAS offers the following comments on some of the issues in the HMSPDT report.

Management Cycle

The HMSAS recognizes that, in order to take advantage of the most recent data available, the HMSPDT's preferred cycle is best. However, this schedule is not the best for receiving input from affected fishers, since many will be fishing during the September meeting. The HMSAS requests the Council strive to maximize public input in the process.

Permits

The HMSPDT is requesting Council clarification of its preferred alternative to require federal permits for all commercial HMS fisheries. Does this requirement also apply to commercial passenger fishing vessels (CPFVs)? The HMSAS supports a federal permit for CPFVs that would include federal recognition of a state permit, if a state permit is currently required.

The HMSAS recommends the permitting system be set up to avoid problems encountered in past programs, especially since there may be one or more limited entry programs implemented in the future. For example, should the permits be awarded to the individual or the vessel? Given the experience of the states and NMFS in establishing permit programs in other fisheries, it should be possible to develop the most effective system initially in the FMP to avoid problems down the line.

Maximum Sustainable Yield (MSY)

The HMSAS is aware the HMSPDT has developed new MSY estimates or proxies for several HMS stocks, and these will be expressed as point estimates instead of ranges. For some stocks, proxies are used which are averages of recent catches, lacking a better estimate of MSY. This creates a potential problem for stocks like dorado. Availability of dorado varies greatly with oceanic conditions. Will high catches as a result of warm water trigger the overfishing definition? The HMSAS hopes the FMP will include some recognition of this problem and some flexibility to deal with it. We will be reviewing the next version of chapter 3 with this in mind.

Small-Mesh Gillnet Fishery

If the Council determines that small-mesh gillnet gear is legal gear for HMS, then this fishery will need to meet the mandates of the Magnuson-Stevens Act with regard to bycatch. There will need to be a detailed observer plan developed for this fishery at the same time plans are being developed for the other fisheries.