

GROUND FISH ADVISORY SUBPANEL STATEMENT ON
REPORT ON THE BYCATCH WORKSHOP AND OBSERVER DATA UPDATE

The Groundfish Advisory Subpanel (GAP) met jointly with the Scientific and Statistical Committee and the Groundfish Management Team to review the results of the bycatch workshop and the data analysis conducted by the NMFS Northwest Fisheries Science Center on some of the results of the Pacific groundfish observer program. While the GAP had no comments on the workshop report, it does have several comments on the data analysis and the revised bycatch model developed as a result of that analysis.

First, the GAP is deeply concerned that - in spite of assurances to the contrary - NMFS continues to release piecemeal data from the observer program. To date, only trawl observer data has been released (and initially released unfiltered, prompting at least one sensational newspaper article which mis-used the data to reach erroneous conclusions), even though 20% of the coverage has been on limited entry fixed gear and open access vessels. Bycatch assumptions are being used by the Council to establish management measures, yet we have no way of knowing whether these assumptions are correct. NMFS needs to provide the Council with the full range of data.

Second, the data being used to supplement the observer data and establish bycatch projections is wholly inadequate. Part of the bycatch model continues to be based on 1999 logbook data, which - given the change in management - is completely useless as an indicator of fleet behavior. The bycatch model continues to rely on hindcasting that is nearly prehistoric, since it lacks updated logbook and fishticket information.

Third, the model tries to estimate the presumably positive effects in terms of bycatch reduction of the significant area closures and other management measures imposed on both commercial and recreational fishermen, but cannot do so, because it lacks up-to-date information. As a result, the fisheries are still being managed by old assumptions using old data. Even the bycatch workshop noted that the data are incomplete and need further analysis.

Fourth, some members of the GAP raised questions with using data that comes from a brand new system that may still have problem areas, especially in the area of species identification. Several examples were given where mis-identification problems have occurred. The GAP recognizes that observer reports are available to vessel operators; unfortunately, obtaining those reports has occasionally been difficult. The GAP suggests that the NMFS observer program instruct the observers to make clear to the vessel operator that the report is available, or perhaps to automatically give a copy to the operator.

Fifth, even the existing bycatch model can overestimate bycatch impacts. Last year, significant changes in management were imposed in order to avoid over harvest of darkblotched rockfish. However, in hindsight, keeping the prior management regulations in place would have led to total catch levels that were the same as originally projected.

Last, the GAP believes there is an urgent need to use real-time data. We need to investigate the use of data collection methods such as card swipes and electronic logbooks to get that data available to managers. While raw observer data should not be the basis for all management changes, inferences can be developed from that data that can be used to ground truth model projections.

The GAP appreciates the tremendous amount of work Dr. Jim Hastie and others at the Northwest Fisheries Science Center have put into developing the bycatch model. However, the majority of the GAP strongly believes it is premature to use the model projections we have, to date, as a means of establishing inseason management recommendations. The GAP urges Dr. Hastie and his colleagues to continue refining the model, so more complete information can be provided to the Council later this year.

A minority of the GAP believes the revised model and the data used to develop it represent the best scientific information available and - since it was judged acceptable - needs to be used for inseason management at this time.

PFMC
04/09/03