

SCIENTIFIC AND STATISTICAL COMMITTEE REPORT ON THE
GROUND FISH BYCATCH PROGRAMATIC ENVIRONMENTAL IMPACT STATEMENT

Mr. Jim Glock presented alternatives and supporting analyses in the current draft of the Bycatch Programatic Environmental Impact Statement (PEIS, Exhibit C.13.a, Attachment 1) to the Scientific and Statistical Committee (SSC).

Four of the six alternatives in the PEIS deal primarily with regulatory bycatch. However, guidelines under National Standard 9 of the Sustainable Fisheries Act also require consideration of non-regulatory sources of bycatch. The SSC raised this issue in its statement from September 2003, but it is not clear how the issues of non-regulatory bycatch and discard are addressed in Alternatives 1-4.

Analyses currently in the PEIS are qualitative, which the SSC understands is customary. On the other hand, observer coverage, logbook, and other reporting requirements, as well as levels of enforcement, differ among the alternatives. Quantitative information about respective costs and other practicalities under each of the alternatives is needed for the Council to make an informed choice among alternatives. The qualitative analysis contained in the PEIS does not facilitate this type of choice.

The alternatives entail different levels of bycatch reduction relative to the status quo. However, the PEIS does not currently contain information on current bycatch and discard amounts, though such information is available (e.g., Table 5-5 in Amendment 16-3, Exhibit C.12.a, Attachment 1). The SSC recommends that future work estimate ranges of bycatch reduction, relative to the status quo, for each of the alternatives to better inform decision-making.

Finally, alternatives in the PEIS are combinations of bycatch reduction tools, and the six alternatives seem to be presented in order of increasing restrictiveness. For example, Alternative 6 includes individual quotas, marine reserves, and total retention of catch. The SSC does not see why these three particular management tools would necessarily need to be implemented simultaneously. More generally, it is not clear whether the Council's choice of a preferred alternative would require the use of all tools specified under that alternative, or would merely give the Council flexibility to use any subset of these tools. Therefore, the SSC considers it important to maintain flexibility in developing a suite of management tools that would allow the Council to develop regulatory alternatives that best achieve the purpose of the PEIS (Section 1.3, pages 1-2).