

GROUND FISH ADVISORY SUBPANEL STATEMENT ON
NATIONAL MARINE FISHERIES SERVICE REVISION OF
NATIONAL STANDARD 1

The Groundfish Advisory Subpanel (GAP) attended the presentation by Dr. Richard Methot on proposed changes to National Standard 1 Guidelines (NSG1). Due to lack of time, the GAP was unable to hold extensive discussions on the material presented in the briefing. However, we are aware that there are issues included in the *Federal Register* notice announcing proposed revisions to NSG1 which were not covered in the briefing.

One of the most important of these is the requirement that all fishing mortality - including research mortality - be attributed to optimum yield. The law specifically allows research catch to be deducted from the acceptable biological catch, and the GAP has several times recommended to the Council that this process be used. We do not believe that National Marine Fisheries Service should provide guidance to the Councils that is contrary to law.

It is unclear to the GAP how some of the other proposed changes will affect management by the Pacific Fishery Management Council. For example, the proposal establishes a mechanism for managing core stocks and stock assemblages. If the result of this change is even more stringent weak stock management, then the GAP has serious concerns. If the result is true management of related stocks as a unit, then the GAP believes it should be more closely examined for its positive possibilities.

We are also puzzled by lack of clarity of language dealing with environmental effects on rebuilding. There appears to be no accounting for predator-prey interactions among stocks. There is reference to "prevailing ecological and environmental conditions" and "environmental changes" in the definitions of maximum sustainable yield and overfishing, but no clear definition of what these terms mean or how they should be used to accomplish management.

We recognize the Council and its advisory bodies have had only limited time to examine the proposed revisions, and the time available for comment is short. Nevertheless, we encourage the Council to make what comments it can and continue to track this issue closely.

PFMC
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