

GROUND FISH ADVISORY SUBPANEL STATEMENT ON
LEGISLATIVE MATTERS

During its discussion on inseason adjustments in relation to the request by the Coos Bay Trawlers Association that discrete petrale areas be re-opened, the Groundfish Advisory Subpanel (GAP) recognized that part of what led to this situation were the legal requirements governing rebuilding overfished species.

The Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA) will likely be considered for amendment by Congress next year. We expect the Council will be asked by NMFS and Congress to present their views on MSFCMA issues. When that occurs, the GAP requests the Council to forward our concerns about the rebuilding process, including specifically:

- * the need to recognize uncertainty in estimates, including estimates of total mortality;
- * the need to recognize the uncertainty - both high and low - in stock assessments;
- * the need to take rebuilding actions gradually in order to avoid sudden severe impacts on coastal communities; and
- * the need to remove artificial legislative time frames for rebuilding.

PFMC
11/04/04