

## HABITAT COMMITTEE COMMENTS ON KRILL HARVEST BAN

The Habitat Committee (HC) strongly supports the adoption of an alternative that will prohibit the possible development of any krill fishery within Council-managed waters. Krill are a major dietary component of many economically important fish species, and their importance is reflected in the ban on landings already implemented in the West Coast states and in waters managed by the North Pacific Fishery Management Council.

The adoption of NMFS' Option 3, designating krill as forage, has clear benefits for this Council. It will provide consistency between the two Councils and appears to offer the most immediate benefits.

In implementing this approach, the HC recommends that, in addition to krill, other similar prey species not currently harvested be identified as forage and that their harvest be prohibited.

The adoption of a similar measure by the North Pacific Council has provided a transferable blueprint, with a development and implementation plan that was relatively simple and quick. The NMFS analysis provided in H.4.b suggests Alternative 3 would not create a large Council work load issue if the amendment were kept simple. A generic fishery management plan (FMP) amendment could also be used in all Council FMPs for which krill is known to be forage, again keeping the associated workload to a minimum.

The benefits described above cannot be derived from the adoption of NMFS' preferred Option 2. The incorporation of krill as a management unit species in the coastal pelagic species (CPS) FMP appears to require a much greater commitment of Council resources. Inclusion of krill in the CPS FMP would also require the Council to reset the total allowable catch annually, potentially allowing for future harvest. Alternative 3 would negate this requirement for annual action.

Finally, the HC suggests that research on krill may provide insights into ocean productivity that can help us understand and manage other species. With this in mind, every opportunity should be taken to support research and data collection on krill and other forage species.

PFMC

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