



*Conserving Ocean Fish and Their Environment
Since 1973*

June 6, 2005

Mr. Mike Burner
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220-1384

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PFMC

Dear Mr. Burner,

In accordance with our conversation at a recent Coastal Pelagic Species Committee meeting, I am writing to request that the Committee consider an agenda item for discussion at a future meeting. Specifically, we are interested in working with the Council to begin developing pro-active ways to address ecosystem-based issues and concerns within the framework of the FMP for Coastal Pelagic Species.

We appreciate that the Council has managed these species conservatively, and that, from a single-species perspective, they are being sustainably fished. However, we also recognize that catches of prey species may impact predator species in (so far) unknown and unpredictable ways. We recommend considering new measures to ensure sustainable fisheries targeting forage fish for the long-term, while preserving an adequate population of forage fish to support healthy populations of predators, including valuable commercial and recreational fish.

The National Coalition for Marine Conservation respectfully submits the attached "blueprint" in hopes of beginning the dialogue on how best to develop a defined process for harmonizing management objectives and synchronizing management regulations for sardines, mackerel, squid and anchovy with those for related predator species under the Council's jurisdiction, such as swordfish, striped marlin, salmon, and rockfish.

We believe that now is the time to begin this dialogue. The prospects for providing enduring protection for stocks of forage fish are good, because these resources are not currently "overfished" and precautionary measures can be implemented without causing any dislocation and economic sacrifice in the existing fisheries. It would be, in other words, a win-win situation for all concerned.

We look forward to working with the Council on this issue, and I hope a future meeting will provide an opportunity to more fully discuss it. Thank you for your consideration.

Sincerely,

Ken Hinman
President

A BLUEPRINT FOR AMENDING FMPs FOR KEY FORAGE SPECIES

- 1st. Explicitly feature protecting and maintaining the species' ecological role, including preservation of an adequate supply as forage for predators, as the principal plan objective.ⁱⁱ**

Elevating protection of the species' ecological role to a plan priority would facilitate adoption of specific management objectives in the allocation of fish as a harvestable resource and as prey for other species.

- 2nd. Expand the FMP's information base to fully describe and comprehend the links among associated species, incorporating available information on ecosystem health and integrity.ⁱⁱⁱ**

An expanded database would help provide scientists with a comprehensive analysis for use in making an ecosystem-based assessment of the status of the population, and assist managers in making decisions on allocating the standing stock among predators (including humans).

- 3rd. Add a definition of "ecosystem overfishing" as a complement to traditional overfishing criteria, including ecologically-relevant reference points (targets and thresholds).^{iv}**

Generally speaking, ecosystem overfishing occurs when reducing one component of the food web adversely impacts another, or precipitates (often unknown or unpredictable) changes in the environment. This new definition would facilitate setting an Optimum Yield that properly takes into account ecological factors (the "optimum ecological yield"), as the Magnuson-Stevens Act requires, while establishing measurable criteria for achieving OY. The technical guidelines for implementing an ecosystem overfishing definition should account for ecological linkages and include calculable reference points and triggers for action.

- 4th. Establish an interim, precautionary total allowable catch (TAC) that provides a suitable buffer against ecosystem overfishing.^v**

Collecting, synthesizing and analyzing ecologically-relevant data and developing ecological reference points to guide management decisions will take time and may always contain a degree of uncertainty. Conserving fishing mortality targets and thresholds, as interim measures, would minimize risk to other components of the food web as our knowledge and understanding of the ecosystem improves.

¹ The NMFS Ecosystems Principles Advisory Panel (EPAP), in its 1999 Report to Congress, encourages the Regional Fishery Management Councils to apply ecosystem principles, goals and policies to the conservation and management measures of existing FMPs. Three actions are particularly important, the panel says. First among these, "each FMP's conservation and management measures should consider predator-prey interactions affected by fishing allowed under the FMP.

ⁱⁱ The Washington State Forage Fish Management Plan emphasizes the role of forage fish in the ecosystem and considers catch on a secondary basis. "The ability of forage fish to provide a source of food for salmon, other fish, marine birds and marine mammals will be a primary consideration."

The recently completed NOAA Chesapeake Bay Fishery Ecosystem Plan recommends: "Consider explicitly strong linkages between predators and prey in allocating fishery resources. Be precautionary by determining the needs of predators before allocating forage species to fisheries."

ⁱⁱⁱ Most FMPs contain only a superficial portrait of the species' ecological role. This information should be expanded and enhanced to describe the significant food web with quantitative and qualitative assessments of interspecies relationships, temporally and spatially, as well as at different life stages.

^{iv} After passage of the Sustainable Fisheries Act in 1996, a team of scientists was assembled to standardize criteria for the overfishing definitions required in every FMP. As the Councils move toward an ecosystem-based approach to fisheries management, including eventual development of Fishery Ecosystem Plans, it would be useful now to convene a similar panel to develop ecological reference points (benchmarks and thresholds) for defining ecosystem overfishing in FMPs.

^v The NMFS EPAP advises that "(i)n practice, changing the burden of proof will mean that, when the effects of fishing on either the target fish population, associated species, or the ecosystem are poorly known, fishery managers should not expand existing fisheries by increasing allowable catch levels or permitting the introduction of new effort.