

COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON
FISHERY MANAGEMENT PLAN AMENDMENT – KRILL

The Coastal Pelagic Species Advisory Subpanel (CPSAS) met February 22, 2006 in Long Beach, California, and heard a report by Mr. Svein Fougner regarding alternatives included in Draft Amendment 12 of the Coastal Pelagic Species (CPS) Fishery Management Plan (FMP), “Measures to Prohibit Fishing for Krill in the West Coast EEZ”.

The majority of the CPSAS (7-1-1) believes philosophically that placing an outright prohibition on the harvest of a resource without adequate information is inappropriate; more information is needed to assess the potential allowance of a krill fishery in the future. This statement is consistent with our November 2005 report. The CPSAS understood after that meeting that NMFS would investigate alternative strategies to manage krill in the absence of adequate knowledge, for example a moratorium on harvest until additional research was available. A majority of the CPSAS expressed concern that other potential alternatives beyond an outright prohibition were not further explored.

The CPSAS does appreciate that the draft amendment places krill in a separate category of the CPS FMP. The CPSAS agrees krill is critically important to the ecosystem as forage for numerous species. The CPSAS anticipates that Amendment 12 is likely to go forward. Upon further review, CPSAS members agreed that implementation of this amendment as written could result in curtailment of other fisheries as an unintended consequence of specific language within this document.

For example, the language in the second objective listed under Section 2.2 of the draft Environmental Assessment (Agenda Item H.2.b), is vague and too generalized on references to “fishing” and “fishing gear.” As written, this language could be misconstrued as an intent to close or restrict fisheries targeting species that prey on krill in krill habitat areas. We strongly believe this objective requires revision before this Amendment goes forward to insure that fisheries directed at species other than krill are not pre-empted to protect “hot spot” areas where krill may concentrate periodically. The CPSAS suggests the objective be revised to speak to the protection of krill essential fish habitat as a means of ensuring the continuation of the vital role krill plays in the ecosystem, including krill’s role as a prey species.

Regarding potential enforcement issues related to a prohibition on krill harvest, we suggest that a minimum amount of bycatch be allowed (e.g. 10 lbs.) in other authorized fisheries to avoid the possibility that a fisherman with a small amount of krill on deck or in a net would be cited for possessing a prohibited species.

The CPSAS discussed Alternatives 2 and 3 at length, and a majority recommends that the Council adopt a preferred option that includes the best features of each of these alternatives. While all members can support an initial prohibition on krill harvest, opinions diverged about how to address the potential for krill harvest in the future.

The CPSAS Conservation Group representative supports a prohibition on krill harvest. The member voted in opposition to future consideration of krill harvest and in support of the Council's preliminary preferred alternative in light of krill's importance to the marine ecosystem and the risk of irreversible harm to managed fisheries and marine life that depend on krill.

CPSAS representatives from California support an initial prohibition on krill harvest, as under Alternative 2, but also could support a method to explore the potential for an experimental fishery in the future, as under Alternative 3.

Washington and Oregon CPSAS representatives expressed interest in exploring the potential for a future krill fishery, and suggested modifying Alt. 2 to delete the language prohibiting Exempted Fishing Permits as a mechanism for exploring potential krill harvest. Such permits would be considered on a case-by-case basis in any event, and industry representatives would like to leave the door open for such consideration in the future.

Alternative 3 prohibits krill fishing initially and establishes a process to allow future fishing. This alternative provides the opportunity to further investigate krill harvest; however, the workload required to establish such a process could be large and the biological information needed to determine an appropriate harvest level is limited. More research is needed, and we encourage the Council to recommend increased funding for research to encompass all the CPS species, including sardine, squid, and krill.

A majority of the CPSAS recommend that the Council establish a formal review process for this amendment in three years. By that time, further scientific data and information may be available to consider establishing a process to allow limited fishing in the future, with the requisite monitoring and evaluation program.

PFMC
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