

GROUND FISH ADVISORY SUBPANEL REPORT ON PREPARE COMMENTS ON
PROPOSED CHANGES TO NATIONAL STANDARD GUIDELINES 1, 3, AND 7

The Groundfish Advisory Subpanel (GAP) received a report on revisions to National Standard Guidelines (NSG) 1, 3 and 7 by Mr. Wes Patrick of the National Marine Fisheries Service (NMFS).

The GAP appreciates the time, effort, and ideas that NMFS put into the proposed revisions to the guidelines in an effort to provide clarity, more flexibility, and options to the seafood industry and fishery managers. Many options may be helpful, such as being able to get out of the rebuilding system if a stock is determined not to have been overfished to begin with, but the GAP also notes that some changes are more pertinent to other parts of the country and not necessarily applicable on the West Coast.

The primary issue for the West Coast groundfish industry is flexibility in the rebuilding system. The necessary changes must be done through reauthorization of the Magnuson-Stevens Act (MSA) and cannot be made by guideline revisions. For example, revising the rebuilding time requirements while also addressing the social and economic issues by changing “possible” to “practicable”; and streamlining the National Environmental Policy Act (NEPA) and MSA section 204(i). These and other suggestions can be found in our statements on legislative issues from [November 2013](#) and [June 2014](#).

Given the uncertainty of a timeline in Congress to reauthorize the MSA, these NSG revisions may provide some flexibility in the meantime, as some of our suggestions in those November 2013 and June 2014 statements on legislative issues have already been included in the revisions.

PFMC
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