

## COASTAL PELAGIC SPECIES MANAGEMENT TEAM REPORT ON UNMANAGED FORAGE FISH REGULATIONS

The Coastal Pelagic Species Management Team (CPSMT) reviewed the Ecosystem Workgroup (EWG) report on unmanaged forage fish regulations and Council Operating Procedure 24, and offers the following comments.

The EWG analysis shows that catch of shared Ecosystem Component (EC) species in the coastal pelagic species (CPS) fishery is low and unlikely to exceed the proposed 10mt daily and the 30mt annual landings caps. Most of the unmanaged forage fish lack species codes, making it impossible to differentiate shared EC species from species such as Humboldt squid, which are not shared EC species. This will make tracking of landings and enforcing the annual cap difficult. Adding new species codes, especially for Humboldt squid, could provide better data on landings, incidental catch, and discards.

The proposed regulatory language for the daily and annual caps accomplishes the Council's direction to hold individual vessels accountable; however, the language does not account explicitly for "unique" events. Because the data in the EWG report is aggregated, it could be masking such unique events. In addition, the forage fish regulations are intended to prevent new fisheries developing on currently unmanaged forage fish, and are not intended to impact current fishery operations. For these reasons, the CPSMT urges caution regarding enforcement of the new regulations and any associated penalties, during the first two years of the program. The program should undergo a streamlined review after two years, and at least every five years thereafter.

A majority of the CPSMT does not support the proposed change recommended by the EWG (in D.2.a EWG Report) to include the phrase "*and in exceptional circumstances*" in the Purpose of COP 24. The process for proposing, researching, and proving that a new fishery will not result in undue harm is already a substantial burden of proof. The lack of a definition for "exceptional" makes it difficult to determine for certain the value or impact of adding this phrase but it suggests a threshold more in line with prohibition of new forage fishery development which is inconsistent with the Initiative's stated purpose to limit new forage fishery development except via an exempted fishing permit.