



International Game Fish Association

Fishing Hall of Fame & Museum

300 Gulf Stream Way, Dania Beach, Florida, 33004 U.S.A.
Phone: (954) 927-2628 • Fax: (954) 924-4299 • Museum Fax (954) 924-4220

September 8, 2015

Dorothy Lowman, Chair
Pacific Management Council
1100 NE Ambassador Place, #101
Portland OR 97220

RE: Agenda item G.2- Swordfish Management Plan and Hard Caps

Dear Chair Lowman and Council members,

The International Game Fish Association (IGFA) was founded in 1939 and is dedicated to the conservation of game fish and the promotion of responsible, ethical angling practices. Currently, the IGFA has over 25,000 members in 176 countries, with over 1,000 residing in states under the purview of the PFMC.

The IGFA would like to go on record regarding the swordfish management plan. We urge the council to develop a management and monitoring plan that will ultimately transition drift gillnet (DGN) gear out of the fishery in favor of more selective gear that incurs less bycatch and also has less bycatch mortality. DGN gear is antiquated and leads to unacceptable levels of bycatch, especially of imperiled species of marine mammals, birds and fish.

While we acknowledge that the commercial fishing industry is charged with providing quality seafood products to the American populace, the council needs to help provide gear alternatives that will allow commercial fishermen to fish more sustainably. The IGFA would like the council to take action to authorize the use of deep-set buoy gear (DSBG) as soon as possible. DSBG is being used with success in other regions and has been shown to have less bycatch than other gears (e.g., longline) and lower bycatch mortality because the gear is actively tended.

IGFA is very supportive of establishing hard caps for the DGN fishery. We do not, however, feel that this is a long-term solution for the bycatch issue in this fishery, but rather an interim step while other, more sustainable gears are evaluated and are transitioned into the fishery. Furthermore, we also support an annual hard cap with 100% monitoring, not a two year average or two year rolling cap.

In summary, we believe that there needs to be a scheduled plan for transitioning DGN gear out of the fishery. Drift gill nets have already been banned elsewhere in the United States and abroad because of their indiscriminate nature and high bycatch. It's time that the Pacific Fisheries Management Council phases out this outdated gear in favor of more selective gear that allows U.S. commercial fishermen to fish sustainably.

The International Game Fish Association is a not-for-profit organization committed to the conservation of game fish and the promotion of responsible, ethical angling practices through science, education, rule making and record keeping.

Email: HQ@igfa.org • Website: www.igfa.org

In addition to our organization, there are other recreational angling groups (e.g., Coastal Conservation Association - California) that feel similarly, as do a number of environmental NGOs. This type of broad scale consensus demonstrates that there is sincere concern over future use of DGN gear in federal waters. We hope that the council will view these comments constructively and we look forward to working with the council to both enhance marine fisheries and provide sustainable fishing alternatives to stakeholders.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Schratwieser', with a long horizontal stroke extending to the right.

Jason Schratwieser
IGFA Conservation Director