

SALMON TECHNICAL TEAM REPORT ON COMMENTS ON BYCATCH STRATEGY  
AND BYCATCH REDUCTION PLANS

The National Marine Fisheries Service (NMFS) Draft National Bycatch Reduction Strategy (Agenda Item C.2, Attachment 1) broadly defines “bycatch” as discarded fish or interactions between fishing operations and protected species, while the Magnuson-Stevens Act (MSA) defines “bycatch” as fish that are harvested in a fishery, but which are not sold or kept for personal use, and includes both economic and regulatory impacts. The definition in the NMFS draft strategy appears to be broader than that of the MSA, but both seem to be focused primarily on commercial fisheries, where bycatch can be clearly defined as interactions with species that do not contribute to the economic benefits of a fishery. In commercial fisheries, bycatch and the resultant mortality associated with bycatch carry an economic cost to the industry as well as a biological cost to the ecosystems on which the industry depends.

The picture in recreational fisheries is much less clear. In recreational fisheries, not all benefits can be quantified in economic terms. People participate in recreational fisheries for the experience, and economic benefits accrue to society largely through the support industries facilitating public participation in the experience of fishing. Some recreational fisheries are primarily focused on retention of fish for personal use, but others focus on the recreational experience and use non-retention as a management tool to expand opportunity for participation while constraining biological impacts. In these fisheries it is not at all clear the reduction in non-retained catch is beneficial. It is unfair and inappropriate to equate the impacts resulting from the discard of unwanted catch in commercial fisheries with non-retention resulting from management measures intended to increase recreational opportunity within the constraints of total impacts.

The definition of bycatch in the National Bycatch Reduction Strategy should clearly distinguish between these two types of non-retention.