

HIGHLY MIGRATORY ADVISORY SUBPANEL REPORT ON SWORDFISH MANAGEMENT PROJECT PLANNING

The Highly Migratory Species Advisory Subpanel (HMSAS) appreciates the opportunity to offer comments on the following 1) drift gillnet fishery monitoring provisions, 2) observer and logbook data reporting improvements for deep-set buoy gear exempted fishing permits (EFPs), and 3) update on deep-set buoy gear (DSBG) EFP permitting process and timeline.

Drift Gillnet Fishery Monitoring Provision:

Increased monitoring (human or electronic)

The HMSAS initially notes that increased monitoring does not mean decreased bycatch. The two are unrelated.

In September 2015, the Council took action recommending hard caps. In order to ensure compliance with the recommended actions, the Council also addressed observer requirements and elected to “maintain the 30% target observer coverage level at a minimum and/or require electronic monitoring (for the purpose of catch and bycatch accounting). Remove the unobservable vessel exemption. Achieve 100% monitoring by 2018.”¹ When NMFS made a negative determination on the hard caps proposed rule, the purpose and need for 100% observer coverage no longer existed. As such, the HMSAS sees no need to burden the fleet with the costs of 100% monitoring and recommends returning to NMFS’ fleet-wide observer coverage target. Since 2013, this target has been 30 percent. This is an increase from the 20% recommended in the Barlow study of 1989, which also included consideration of rare events. The HMSAS notes the estimated daily costs associated with human observers (at least \$600/day) and electronic monitoring (\$361/day amortized including \$10,000 initial set-up costs) as outlined in the Supplemental NMFS Report 1 for this Agenda item. The HMSAS would like the Council to revisit the purpose and need statement for requiring 100% monitoring for the DGN fleet.

Removing the “unobservable vessel” exemption

Removing the unobservable vessel exemption would, in effect, eliminate one third of the active DGN fleet and result in an unfair economic loss for these boats, buyers, and fishing communities who benefit from their catch. Both NMFS and Frank Orth and Associates have routinely inspected DGN vessels and have excluded certain vessels for safety or accommodation reasons. Reduction in local swordfish landings will likely result in increased imports of swordfish from nations with less regulatory burdens. The transfer effect and trade leakage effect imply this would result in a net conservation loss as increased efforts by foreign fleets result in increased interactions with protected species and other species of concern.

If during the review of the purpose and needs, there is a valid reason for removing the unobservable vessel exception; the HMSAS recommends an EFP for electronic monitoring of unobservable

¹ <http://www.pcouncil.org/2015/09/38641/california-large-mesh-drift-gillnet-fishery-management-final-preferred-alternatives/>

vessels be established. There could be an opportunity for NGOs to assist with funding these efforts.

Generalized statement about performance in the DGN fishery

The DGN fleet has seen great reduction in bycatch over the last 20 years. The Regulations implementing National Standard 9 (50 CFR §600.350) requires: “Conservation and management measures shall, to the extent practicable: 1) minimize bycatch; and 2) to the extent bycatch cannot be avoided, minimize the mortality of such bycatch.” At this time, the HMSAS sees no purpose and need to burden the DGN fleet with more regulations. This fishery has shown great innovation and improvement in reducing bycatch and we should be celebrating its success. The HMSAS supports fishermen working with EcoCast to study its viability in the DGN Fishery.

Observer and Logbook Data Reporting Improvements for Deep-Set Buoy Gear EFPs, and Update on DSBG EFP Permitting Process and Timeline

The HMSAS also received updates on the status of the EFPs previously approved by the Council and data reporting requirements for those EFPs. The HMSAS supports the overview contained in the Supplemental NMFS Report 1 for this Agenda item. The HMSAS supports ongoing efforts in California to implement electronic catch reporting.

PFMC
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