

SUPPLEMENTAL GAP STATEMENT ON FISHERY ECOSYSTEM PLAN (FEP) FIVE-YEAR REVIEW

The Groundfish Advisory Panel (GAP) received a briefing from Pacific Fishery Management Council (PFMC) Staff Officer Dr. Kit Dahl about the Fishery Ecosystem Plan (FEP) five-year review and reviewed the items under this agenda item. We also referred to our [September 2019 GAP statement](#) discussing the proposed revisions.

Final Action on Revisions to Chapters 1 and 2 of the FEP:

The GAP appreciates the efforts of the Ecosystem Workgroup (EWG) and finds the public review draft of Chapters 1 and 2 largely responsive to the GAP input from September 2019 and the subsequent Council action and guidance. In particular, the GAP appreciates that the proposed revisions to Chapters 1 and 2 help clarify that the FEP is not meant to be a prescriptive document or process relative to Council fisheries management actions. Overall, the GAP supports adoption of the proposed revisions to Chapters 1 and 2, though we offer the following suggestions for the Council's consideration.

First, we note that the proposed goals and objectives are more extensive and specific and are more focused on ecosystem status than the current FEP goals and objectives, which placed a greater emphasis on process. The GAP is supportive of this change but suggests that effective tracking of ecosystem status against the new goals and objectives will likely require additional technical work, including an increased role for the Scientific and Statistical Committee (SSC). The annual joint meetings of the SSC Ecosystem Subcommittee and the Integrated Ecosystem Assessment Team could be a good place to begin discussing and addressing this need.

The GAP also reviewed and appreciates the letter submitted by several conservation nongovernmental organizations (NGOs, The Nature Conservancy, Ocean Conservancy, and Wild Oceans). The complexity and volume of the changes outlined in the letter were a challenge just ahead of final action. The GAP did not have time to thoroughly review and discuss the full contents of the letter, but we did identify several suggestions that would improve the FEP and suggests that the Council consider incorporating them in final action. Our suggestions on this letter are limited to the following specific items, and we recommend that any other new goals and objectives the Council incorporates from the letter be carefully evaluated for potential unintended consequences on the fleets.

First, the GAP supports the revision of the Vision Statement proposed by the NGOs, which would replace the phrase “ecosystem services” with the word “benefits” and also specify that the Council seeks to maintain the ecosystem in a thriving and resilient state. The GAP agrees that explicitly aspiring to a healthy ecosystem is an important commitment toward fulfilling the Council’s dual mandate of protecting fishing communities and fishery resources.

Second, the GAP supports the NGO suggestions for revising Objective 3c, which place a greater emphasis on the Council’s role in influencing the actions of other entities that affect fishery resources and communities. Non-fishing ocean impacts – for example, renewable energy

development – are some of many increasing stressors on the ecosystem. While the Council has limited ability to ameliorate these stressors, making this objective as aspirational as possible is wise.

Finally, we support the inclusion of an objective under Goal 1 related to increasing the diversity of participants in the Council process (Proposed Objective (1)(f) in the NGO letter). The GAP benefits from the diversity of groundfish interests represented on the panel and supports efforts to further increase diversity in the Council process, including but not limited to geography, industry sector, socioeconomic status, and background. As an example, the Marine Resource Education Program has proven to bring people with diverse backgrounds and interests into ancillary Council meetings. This has been helpful, and the GAP encourages this kind of outreach and input.

Conversely, the GAP is concerned that proposed Objective 2d in the NGO letter appears to be in conflict with the mandates of the Magnuson-Stevens Act (MSA). If the Council adopts this change, it should be revised to reflect the MSA mandate that bycatch be minimized to the extent practicable, in the same fashion as the NGO's proposed Objective 4c, which correctly states that habitat impacts should be minimized to the extent practicable. The GAP notes the FEP must continue to take into consideration the limiting language of the MSA goals and objectives.

Outline for Revision of Chapters 3-6 of the FEP

The GAP supports the EWG's proposed process, timeline and outline for revising the remaining chapters of the FEP, including the addition of capacity to the EWG to facilitate the effort, with the caveat that this work should not negatively impact the Council's ability to complete other critical work. The GAP understands there is still special projects funding available to cover the ongoing FEP 5-year review and revision, and in that context believes that revision of Chapters 3-6 could pay important dividends. For example, the GAP understands that the EWG will try to revise Chapter 5 (PFMC Policy Priorities for Ocean Resource Management) with an eye toward making it a more effective tool for educating other entities (e.g. action agencies for activities with non-fishing impacts) about the Council and the resources it stewards. The Council frequently struggles with a mismatch between the rulemaking calendars of other entities and the Council's calendar. If a revised Chapter 5 could function as Council input of last resort for any comment periods that the Council would otherwise be unable to participate in, the FEP would provide another important service to the Council family.

PFMC
03/07/20