



Gulf of Mexico Dr. Carrie Simmons Executive Director Thomas Frazer Chair



Mid Atlantic Dr. Christopher Moore Executive Director Mike Luisi Chair New England Fishery Management Council

New England Thomas Nies Executive Director Dr. John Quinn Chair



North Pacific David Witherell Executive Director Simon Kinneen Chair



Pacific Chuck Tracy Executive Director Marc Gorelnik



South Atlantic John Carmichael Executive Director Mel Bell Chair



Western Pacific Kitty Simonds Executive Director Taotasi Archie Soliai Chair



Agenda Item C.1 Supplemental Attachment 4 November 2020

November 5, 2020

Mr. Chris Oliver Assistant Administrator for Fisheries NOAA Fisheries 1315 East-West Highway Silver Spring, MD 20910

Dear Chris,

The Council Coordinating Committee (CCC) convened via virtual conference on September 23-24, 2020 and endorsed a recommendation regarding the National Standard 1 (NS1) Technical Guidance, requesting the NMFS to circulate draft reports of the NS1 Technical Working Groups through the Regional Fishery Management Councils (RFMC) for formal review and comment by their respective Scientific and Statistical Committee (SSC). The review should provide sufficient time for each RFMC SSC to fully evaluate these documents and develop recommendations to their respective RFMCs. Coordination and guidance through RFMCs SSCs is important given the technical nature of these guidance documents and its implications on Council fishery management decisions.

Further, the CCC requested NMFS Office of Sustainable Fisheries form a working group comprised of NMFS and RFMC staff in determining alternative approaches, including but not limited to, fishing mortality rate-based, length-based, or trip limit, etc., in managing data limited stocks pursuant to 50 CFR 600.310(h)(2) stemming from the Technical Guidance memorandum by NMFS Subgroup 3. Nearly every RFMC struggles with obtaining reliable weight-based catch estimates through established data collection programs for data limited stocks as required by the MSA. Alternate approaches should be used for data limited fisheries to produce more representative estimates of stock status in place of relying on highly uncertain catch-based information known to have excessive error. Managing stocks based on proxies from such incomplete or uncertain information disregards likely harvest rates relative to stock productivity. The CCC seeks to further explore alternative approaches to better manage fisheries with data limited stocks in each region and to engage NMFS-OSF in the development of any policies that would stem from this Technical Guidance.

Sincerely,

Taotasi Anchie Soliai, Chair Western Pacific Fishery Management Council

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Phil Anderson, Chair Pacific Fishery Management Council

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Dr. John Quinn, Chairman New England Fishery Management Council

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Simon Kinneen, Chair North Pacific Fishery Management Council

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Mike Luisi, Chair Mid-Atlantic Fishery Management Council

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Marcos Henke, Chair Caribbean Fishery Management Council

Melin Bell

Mel Bell, Chair South Atlantic Fishery Management Council

Thomas & Frazer

Dr. Thomas Frazer, Chair Gulf of Mexico Fishery Management Council