

HIGHLY MIGRATORY SPECIES MANAGEMENT TEAM REPORT ON STANDARDIZED BYCATCH REPORTING METHODOLOGY

The Highly Migratory Species Management Team (HMSMT) followed the guidance in [Attachment 2](#) under this agenda item to review the Standardized Bycatch Reporting Methodology (SBRM) provisions in the relevant sections of the Highly Migratory Species Fishery Management Plan (FMP). Section [6.3.1](#) of the FMP describes the SBRM and [Appendix C](#) discusses HMS fisheries bycatch in detail.

When establishing or reviewing an SBRM, the Council must address the characteristics of bycatch, feasibility of proposed bycatch monitoring and reporting mechanisms, the level of uncertainty in bycatch estimates, and how the resulting information is used to assess the level of bycatch.

General Comments Regarding Preliminary SBRM Review

The SBRM in the FMP is composed of various pre-existing requirements and additional methods that were authorized when the FMP was initially adopted. Pre-existing logbook requirements established by National Marine Fisheries Service (NMFS) and the Inter-American Tropical Tuna Commission, along with periodic recreational fishing surveys and port sampling, provide catch and bycatch information for all HMS fisheries.

The FMP authorizes observer programs for HMS fisheries in section 6.2.3. Such programs were initially mandated at the time of FMP development for the longline, surface hook-and-line, small purse seine, and Commercial Passenger Fishing Vessel (CPFV) fisheries in addition to existing observer programs mandated for the large-mesh drift gillnet (DGN) and pelagic longline fisheries under the Marine Mammal Protection Act and Endangered Species Act. The specifics of these programs are spelled out in the observer sampling plan prepared by NMFS pursuant to FMP implementation. FMP Section 6.2.2 requires all commercial vessels including CPFV to maintain and submit logbooks to NMFS. Taken together these requirements constitute the “required procedure or procedures that constitute the standardized reporting methodology for the fishery” (50 CFR 600.1610(a)). These elements of the SBRM address the purpose and scope articulated at 50 CFR 1600 to “collect, record, and report bycatch data in a fishery that, in conjunction with other information, are used to assess the amount and type of bycatch occurring in the fishery.”

The HMSMT notes that while data and other relevant information to the SBRM are included in [Appendix C](#), it is outdated and should be updated to inform potential impacts to fish stocks as well as the effect of bycatch on ecosystems. The HMS SAFE Report could be revised to include annual updates on observer data, as have been provided in the past.

The HMSMT did not find information in the current FMP to address the Data Uncertainty and Data Use portions of the SBRM criteria. The HMSMT is not sure these considerations are relevant for fisheries with little or no bycatch, such as harpoon or albacore surface hook-and-line. The cost of collecting and maintaining bycatch data does not seem justified if bycatch is minimal or nonexistent, and data uncertainty and use are not relevant if no data are collected.

HMS Fishery-specific Comments Regarding Preliminary SBRM Review

The HMSMT additionally offers the following fishery-specific comments regarding their preliminary SBRM review of HMS fisheries, which is summarized in Table 1.

The DGN fishery has been covered by a NMFS observer program dating back to 1990, which documents catch counts and disposition for all species with observed DGN interactions. Appendix C section C.3.1 includes a list of specific finfish bycatch species that were observed caught in DGN and also explicit tables showing observed counts and disposition of all species for the seasons from 1990/1991 through 2001/2002.

The harpoon fishery is mentioned specifically in section 6.3 of the FMP as assumed to have little, if any, bycatch due to the selective nature of the gear, and it implicitly falls under the scope of SBRM discussion in FMP section 6.3.1.

The Private Recreational Boat Fishery is not mentioned in section 6.3.1 of the FMP. The bycatch reporting methods are, however, described within Appendix C in section C.3.8.

The surface hook-and-line albacore fleet logbook data provides information on self-reported bycatch, however observer coverage is limited (Appendix C section C.5.1.5). The mechanism for observer placement is covered under the FMP Section 6.2.3.

Table 1. Preliminary SBRM Review for HMS Fisheries.

FMP/Fishery	Contain SBRM?	Meet the Purpose?	Consider characteristics of bycatch?	Feasibility check?	Address data uncertainty?	Address data use?
Drift Gillnet Fishery for Swordfish and Sharks	Yes; FMP 6.2.3 and 6.3.1	Yes; FMP 6.3.1	Yes; Appendix C section C.3.1	Yes; Appendix C section C.3.1	No	No
North Pacific Albacore Surface Hook and Line Fishery	Yes; FMP 6.3.1 Appendix C section C.3.2	Yes; FMP 6.3.1	Yes; Appendix C section C.3.2	Yes; FMP 6.2.3 Appendix C section C.5.1.5	No	No
High Seas Deep-set Longline Fishery	Yes; FMP 6.3.1	Yes; FMP 6.3.1	Yes; Appendix C Section C.3.2	Yes; Appendix C Section C.5.1, C.5.2, C.5.5	No	No
Harpoon Swordfish Fishery	Yes; FMP 6.3.1	Yes; FMP 6.3.1	Yes; FMP 6.3	Yes; FMP 6.3	No	No
Tropical Tuna Purse Seine Fishery	Yes; FMP 6.3.1	Yes; FMP 6.3.1	Yes; Appendix C Section C.3.5	Yes; Appendix C Section C.5	No	No
Coastal Purse Seine Fishery	Yes; FMP 6.3.1	Yes; FMP 6.3.1	Yes; Appendix C Section C.3.6	Yes; Appendix C Section C.5	No	No
Recreational Party/Charter Boat Fishery	Yes; FMP 6.3.1	Yes; FMP 6.3.1	Yes; Appendix C Section C.3.7	Yes; Appendix C Section C.3.7	No	No
Private Recreational Boat Fishery	No	No	No	Maybe	No	No