

OPAH STOCK CONSIDERATIONS

In September 2022, the Highly Migratory Species Management Team (HMSMT) requested the Pacific Fishery Management Council (Council) schedule an item to consider inclusion of opah as a managed species in its HMS Fishery Management Plan (FMP). When the HMS FMP was originally implemented opah was identified among 37 “monitored species.” The criteria for identification of monitored species was that they were caught in an HMS fishery and they were not covered by another West Coast management plan or are of special concern.

The Council previously considered changing opah from a monitored species to a managed species as part of HMS FMP Amendment 2, which was approved in 2011. Amendment 2 addressed revisions to National Standard 1 guidelines pursuant to the 2007 reauthorization of the Magnuson-Stevens Act (MSA). Under Amendment 2 two managed species, bigeye thresher shark and pelagic thresher shark, were designated Ecosystem Component (EC) species along with eight of the monitored species (the remaining monitored species were removed from consideration under the FMP).¹ However, the Council decided not to make opah a managed species nor did it retain it as an EC species so currently it is nowhere in the FMP.

National Standard Guidelines (50 CFR600 Subpart D) have been revised since Amendment 2 was adopted. The Guidelines now define EC species as “stocks that a Council or the Secretary has determined do not require conservation and management, but desire to list in an FMP in order to achieve ecosystem management objectives” (see [660.305\(c\)\(5\)](#) and [\(d\)\(13\)](#)). Determining whether a stock requires conservation and management is based on factors enumerated at [600.305\(c\)\(1\)](#).

Attachment 1 excerpts portions of the HMS FMP describing the rationale for deciding which species would be managed and listing current EC species. Opah meets the first two criteria for inclusion as a managed species (the species occurs in the Pacific Council management area and in West Coast HMS fisheries) but not the third (defined as highly migratory in the MSA or the United Nations Convention on the Law of the Sea Annex 1). Opah is a managed species in the Western Pacific Fishery Management Council’s (WPFMC’s) Pelagics Fishery Ecosystem Plan.

The main rationale for designating opah as a managed species, both in 2011 and now, is that West Coast landings have been relatively large. From implementation of the HMS FMP in 2004 through 2013 opah landings remained below 100 mt, averaging 46 mt annually.² In 2013 landings began to surpass 100 mt, peaking at 429 mt in 2020 and subsequently declining substantially to 71 mt in 2022. Most of the landings have been made in the pelagic longline fishery, a large proportion of which operates under limited entry permits issued pursuant to the WPFMC’s Pelagics FEP. The attached NMFS Report 1 provides more information on West Coast landings by fishery. Comparing average annual opah landings to other HMS FMP managed species, it ranks sixth, above skipjack tuna, common thresher shark, dorado, and blue shark. Note however, that dorado and common thresher shark are targeted in the recreational fishery and would likely rank higher if

¹ Amendment 3 added a list of unmanaged forage species to the HMS FMP as EC species.

² Landings data from PacFIN, accessed 7/19/2023. Quantities reported in round weight.

that catch was included. And blue shark is mainly a bycatch species in the pelagic longline fishery, because of its low commercial value in the United States so total catch (including bycatch) is higher.

Under this agenda item the Council should consider whether to initiate a process to incorporate opah into the HMS FMP as a managed species or alternatively as an EC species. As noted above, the factors listed at [600.305\(c\)\(1\)](#) should be consulted in making such a determination.

Council Action:

Review Catch Data and Provide Guidance on Next Steps.

Reference Materials:

1. Agenda Item I.6, Attachment 1: Excerpts from the Highly Migratory Species Fishery Management Plan.
2. Agenda Item I.6.a, National Marine Fisheries Report 1.
3. If received, Public Comments are electronic only ([see e-portal](#)).

Agenda Order:

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| I.6 Opah Stock Considerations | Kit Dahl |
| a. Reports and Comments of Management Entities and Advisory Bodies | |
| b. Public Comment | |
| c. Council Action: Review Catch Data and Provide Guidance on Next Steps | |

PFMC
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