



PACIFIC FISH CONSERVATION CAMPAIGN

4189 S.E. Division St., Portland, Oregon 97202

February 7, 2012

PFMC Agenda Item I.3.C
Future Agenda & Workload Planning

Mr. Dan Wolford, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, #101
Portland, OR 97220

RE: Protecting Unmanaged Forage Species

Dear Chairman Wolford and Council Members,

Please accept this public comment regarding the protection of unmanaged forage species. While there are various management options available to conserve this vital component of the marine food web, the most important thing now is for the Pacific Fishery Management Council (Council) to formally initiate a process to protect these ecologically and economically important species. For this reason, we respectfully request that the June 2012 Ecosystem-Based Management agenda item be scheduled as an action item.

In November 2011, the Council was presented with a list of California Current forage species with corresponding management status and an analysis of the potential for new fisheries to develop on unmanaged forage species.¹ Upon receiving this information the Council requested further analysis of the need and mechanisms for expanding protective measures for forage species.²

In response to Council guidance, the Ecosystem Plan Development Team (Team) conducted a work session in January 2012 whose purpose included revisiting the need and mechanisms for expanding protective measures for unexploited forage species.³ However, because the Council has yet to decide upon a management goal for these species, it has proven difficult to establish a focus for the Team's further analysis. The Team can provide an analysis of existing state and federal authorities dealing with new fisheries and can expand or revise its listing of lower-trophic level species, but until the Council decides upon a conservation and management purpose and goal, the discussion will remain academic. In the meantime, the matter of protecting this particular group of important species will remain unaddressed by the Council.

¹ PFMC 2011. Draft Pacific Fishery Plan, Appendix A. Available at http://www.pcouncil.org/wp-content/uploads/H2a_ATT1_DRAFT_ECO_PLAN_NOV2011BB.pdf

² PFMC 2011. November Decision Document. Page 5. Available at <http://www.pcouncil.org/wp-content/uploads/1111decisions.pdf>

³ PFMC 2011. Ecosystem Plan Development Team Work Session Announcement. Available at http://www.pcouncil.org/2011/12/17770/epdt_conf_call/

The Council has an opportunity here to further establish itself as a leader in the transition towards ecosystem-based fishery management. It can take action now to manage fisheries for the long-term health of the ecosystem, or maintain the status quo under which it can only react to new and potentially harmful fisheries as they develop. The Council's record on this issue includes an identified and discrete set of unmanaged forage species and a market analysis showing those species to be the potential target of future fisheries.⁴ This accurate and comprehensive information clearly demonstrates a management vacuum and the need to protect these species from rapidly developing large-scale industrial fisheries.

Establishing a proactive and precautionary policy for currently non-targeted forage species is consistent with recent advances in knowledge of ecosystem science and the ecological and economic impacts of fishing on low-trophic level species.⁵ It is also consistent with one of the Council's primary reasons for creating the Coastal Pelagic Species (CPS) Fishery Management Plan in the first place; the need to proactively manage for future fishery expansion:

It is likely that the CPS fishery will become overcapitalized faster than management authorities can react if sardine, or other CPS, increase in abundance or markets develop. Experience with the CPS and other fisheries indicate that the process of developing fishery management programs is slower than the rate at which a fishery can become overcapitalized. There is substantial excess capacity in the groundfish, herring and salmon fisheries (including the factory trawler fleet), for example, that could enter the CPS fishery in a matter of months if markets develop.⁶

While the reasoning above excerpted from Amendment 8 to the Northern Anchovy FMP primarily addressed the species in the CPS fishery, it should also hold for the species in Appendix A of the Draft FEP, as similar market forces and geographic overlap would attract future fishery expansion. In particular and as noted in the Draft FEP, increasing demand from the rapidly growing global aquaculture industry⁷ will continue to exert pressure to develop new forage fisheries.

The need to manage for future fishery expansion calls for proactive measures. The Team, the Council's other advisory bodies, and state and federal agency staff have the knowledge and expertise necessary to develop a comprehensive suite of alternate management options from which the Council can choose. What they currently lack is clear direction from the Council that it wishes to protect this critical subset of forage species. The June Ecosystem Based Management agenda item provides an opportunity to do just that.

⁴ PFMC 2011. Draft Pacific Fishery Plan, Appendix A. Available at http://www.pcouncil.org/wp-content/uploads/H2a_ATT1_DRAFT_ECO_PLAN_NOV2011BB.pdf

⁵ Smith ADM et al 2011. Impacts of Fishing Low-Trophic Level Species on Marine Ecosystems. *Science* **333** (6046): 1147-50, 26 August 2011 (published online July 21, 2011); available at www.sciencexpress.org.

⁶ CPS FMP Amendment 8, Appendix B, p. B-3.

⁷ FAO (2011) State of World Fisheries and Aquaculture. Fisheries and Aquaculture Department. Food and Agriculture Organization of the United Nations. Rome, Italy.

Thank you again for the opportunity to participate in this public process and share our concerns regarding ecosystem-based management and the protection of the California Current forage base. We look forward to working with the Council and all stakeholders to maintain healthy oceans and sustainable fisheries.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steve Marx', written in a cursive style.

Steve Marx
Pew Environment Group