

HIGHLY MIGRATORY SPECIES ADVISORY SUBPANEL REPORT ON THE FISHERY ECOSYSTEM PLAN (FEP)

The Highly Migratory Species Advisory Subpanel (HMSAS) has the following comments:

- Even though the FEP is termed a “Plan,” we think it would be better termed an “Assessment” of how the various factors may affect the optimum yield of the Fishery Management Plan (FMP) stocks.
- The HMSAS is concerned that this FEP will negatively influence harvest allowance regulations in the FMPs, and could do irreparable harm to the fishing industry and to the communities that depend on the fisheries.
- We are concerned that conclusions made in the FEP Draft based on the descriptions of a particular fishery may be misleading and lead to stereotypes. For example, on page 46 there is a statement that “... in 2011 there were far more vessels than necessary to harvest the total landings.” The HMSAS thinks this is a misleading statement.
- Another example is on page 54. There is a section for importers and brokers. However, the portion of economics and removals from imports by processors and dealers has not been segregated from the domestic portion.
- The HMSAS is concerned that the State-of-Ecosystem Reporting on page 2 indicates that FMPs may be modified without definitive answers and numbers.
- There needs to be a comprehensive analysis in the FEP on the effects of the biomass removals by marine mammals and sea birds.
- It seems strange to the HMSAS that this draft Plan of the California Current would apply to HMSAS stocks that range outside of the California Current for most of their life cycle.
- A minor comment is that the graphs need to be presented in a way that color is not necessary to understand the meaning, or all copies need to be in color.

In conclusion, the members of the HMSAS received this document less than two weeks ago and received a briefing at 4:00 p.m. on the only day that we were meeting. We think there are many more problems to be identified in the FEP. We recommend that this Draft FEP needs more revision and will not be ready to go to public review by the March Council meeting.

PFMC
11/05/12