

**ADVISORY PANEL**  
**Motions and Rationale**  
**October 4-7, 2022 - Anchorage, AK**

**C4 Greenland Turbot**

The AP recommends moving the Initial Review analysis forward for Final Action with the following revisions to the Purpose and Need Statement and to Alternative 2. Revisions are presented in ***bolded italics*** from the Council's February 2022 motion.

**Purpose and Need**

Whale depredation is precluding directed fishing for Greenland turbot by commercial hook-and-line (HAL) gear vessels in the Bering Sea. Participation in this fishery has been a significant source of income for a number of HAL CP vessels that primarily target Pacific cod. The importance of turbot fishing increased for these vessels as Pacific cod TACs in the Bering Sea saw major declines between 2012 and 2021. Although single pot gear is currently authorized for Greenland turbot, single pots have not been deployed because of their inefficiency in the depth and location where the fishery occurs. A regulatory amendment that would allow vessels to use longline pots when fishing for Greenland turbot would likely resolve the depredation problem and allow this fishery to resume. Other benefits of reduced whale depredation on Greenland turbot could include improved catch accounting for managers, and data quality for the Greenland turbot stock assessment. ***The use of longline pots could disrupt historic and current participants in the HAL CP and the Amendment 80 sectors. This could result in fishery closures and undermine the intent of this action to allow harvest by active participants. Limiting the use of longline pots in the Bering Sea to only the HAL CP sector when directed fishing for Greenland turbot would allow active participants to continue to participate in the fishery, without increasing the potential for new fishery conflicts.***

**Alternatives**

Alternative 1. No action (longline pot gear is not authorized for Greenland turbot in the Bering Sea).

Alternative 2. Authorize the use of longline pot gear ***only for vessels in the HAL CP sector*** when directed fishing for Greenland turbot in the Bering Sea subarea.

Option 1. Exemption from the 9-inch maximum tunnel opening restriction. (The 9-inch maximum tunnel opening requirement does not apply to longline pots used to directed fish for Greenland turbot in the BS subarea.

*Motion passed 14-0*

*Rationale in Favor:*

- *This Initial Review analysis is a follow-up to action originally initiated by Council at the request of participants in the HAL CP sector to address whale depredation experienced by their vessels in the Bering Sea (BS) Greenland turbot fishery that has significantly limited their*

*operations in the fishery in recent years. Participation has declined to the point that in 2021 and 2022 there has been no targeted fishery for Greenland turbot by the HAL CP fleet.*

- *The proposed action would authorize the use of longline pot gear in the BS Greenland turbot fishery by the HAL CP sector. Longline pot gear has proven effective in other HAL fisheries in reducing whale depredation in the fishery. Allowing the use of longline pot gear by these vessels could be a potential solution after many years of unsuccessful efforts to mitigate whale predation using their existing HAL gear.*
- *The members of the Freezer Longline Coalition (FLC) and Groundfish Forum are the only fleets that have consistently participated in the directed BS Greenland turbot fishery. Since 2015 FLC and Groundfish Forum have had an agreement in place to coordinate harvesting activities within and between their sectors to avoid a race for fish and minimize potential conflicts on the fishing grounds. This agreement is an essential component to ensure coordination on the fishing grounds and an orderly and well-managed fishery. Creating conditions that destabilize current participants is not consistent with the intent of this action.*
- *The added language helps to address the specific ask of the fleet directly affected by the issues with predation and is addressing this specific issue as stated in the purpose and needs statement.*
- *The recommended modification to Alternative 2 may help ensure stable conditions in the fishery, particularly in light of the current relatively low TACs and the potential for further reductions. The analysis shows that in most recent years (since 2013) less than five HAL CPs have targeted Greenland turbot in the BS. Conditions of a low TAC, increased harvests by FLC members, and new entrants who are not part of the voluntary agreement could result in NMFS adopting a precautionary management approach and close directed fishing to avoid exceeding the TAC. Results from the 2022 Eastern Bering Sea trawl and longline surveys do not indicate improving stock conditions, nor do longer-term indicators for the stock. The risk of a directed fishery closure may increase because the fishery may face reduced TACs in future years.*
- *The recommended modification could also help minimize the potential for gear conflicts between trawl and fixed gear participants in the fishery. The analysis notes there is currently some spatial overlap between FLC and Groundfish Forum participants in the fishery. Careful coordination among the current participants will be essential to ensure gear conflicts are minimized. If there is additional effort in the fishery, particularly from new entrants not part of the voluntary agreement, the potential for gear conflicts may be increased.*
- *This action is not intended to exclude future participation in the BS Greenland turbot fishery by the limited number of non-HAL-CP vessels that have occasionally participated. All vessels named on a LLP license with BS and non-trawl endorsements may still participate in the fishery using existing gear.*
- *Some AP members expressed concerns about potentially limiting access to this fishery to only the current participants. Support was given for this motion as not to take away from the intent of the action, but the concern was noted about limiting participation in the fishery.*