



# Marine Conservation Alliance

*promoting sustainable fisheries to feed the world*

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May 30, 2017

Mr. Dan Hull  
Chair, North Pacific Fishery Management Council  
605 West 4<sup>th</sup>, Suite 306  
Anchorage, Alaska 99501-2252

**Re: Agenda Item C6: squid to ecosystem component**

Dear Chairman Hull,

The Marine Conservation Alliance represents seafood harvesters, processors, and communities primarily in the North Pacific that support sound, scientific fishery management principles. We appreciate the opportunity to offer our comments on the proposed action to designate squid as an 'ecosystem component' under the Fisheries Management Plans. We recommend that the Council adopt Alternative 2 (moving squid into the ecosystem component) with a Maximum Retainable Amount (MRA) of 20%.

Squid appear to fit well in the definition of non-target species under the ecosystem component of the FMPs, as established in the revised National Standard 1 guidelines. As the analysis indicates, there are no conservation concerns for these stocks in the BSAI and GOA, and scientists agree that current survey techniques underestimate their abundance. In addition, they are short-lived and highly productive, which is generally correlated with high stock resilience. There is at present no targeted fishery for squid, nor is one likely to develop given the difficulty of handling squid on vessels targeting other species. In short, there does not appear to be a need for conservation and management of the stock.


Under the current FMP designation, squid are required to have an Overfishing Level (OFL), Acceptable Biological Catch (ABC), and Total Allowable Catch (TAC). These numbers do not reflect the actual biology or abundance of the species, but are instead based on historical catch. In spite of the somewhat arbitrary nature of the numbers, nearing the OFL can result in actions to avoid squid in fisheries that are already under numerous catch and bycatch constraints. This can impose considerable costs including foregone harvest of other species, with no benefit to squid stocks. This is not in keeping with the mandate to achieve Optimum Yield.

Since there is not a conservation concern, there is no reason to lower the existing MRA of 20%. The lower numbers considered in the action (2% and 10%) would require vessels to sort and discard squid in some instances. Under the current MRA, some vessels will retain incidentally caught squid, which minimizes discards as mandated in the Magnuson-Stevens Act. In other instances, it may be impractical or impossible to sort squid from the catch prior to delivery to a processor. In either case, there is no benefit achieved by requiring squid to be discarded.

We support the Council's continued efforts to maintain the current high levels of sustainability and efficiency in the use of our marine resources, and believe that Alternative 2 with a 20% MRA contributes to those efforts.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script, appearing to read "L Swanson".

Lori Swanson  
Executive Director