Alaska Marine Conservation Council

September 27, 2023

Ms. Angel Drobnica, Chair Chair
North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, AK 99501-2252

Mr. John Kurland, Regional Administrator
NOAA Fisheries, Alaska Region
709 West Ninth Street
Juneau, AK 99802-1668

Re: Agenda Item C3 BSAI/GOA Groundfish Specifications

Dear Ms. Drobnica, Mr. Kurland, and Council members;

The Alaska Marine Conservation Council (AMCC) is dedicated to protecting the long-term health of Alaska's marine ecosystems and the vibrant fishery-dependent communities they sustain. Our members include fishermen, subsistence harvesters, marine scientists, small business owners and diverse fishing families. Our ways of life, livelihoods and local economies depend on the sustainable fishing practices that contribute to healthy ecosystems. In light of this, we offer the following comments on Agenda Item C3, focusing on the critical need to integrate broader ecosystem considerations when setting the Total Allowable Catch (TAC) for groundfish in the BSAI/GOA regions.

Setting the Total Allowable Catch (TAC) level for each single species needs to be done with broader considerations of ecosystem impacts. Prohibited Species Catch (PSC) is one important indicator of ecosystem impacts from fishing efforts. When considering this aspect of anthropogenic drivers of ecosystem change, it is important to note that PSC should not be reviewed solely as a percentage of target-species TAC or harvest. Every action has a chain reaction that ripples through habitats, food webs and human communities - all critical aspects of ecosystem health.

Salmon provides a helpful example. There are times within reporting and analysis that salmon PSC numbers are presented as — x salmon per x metric tons of pollock. While this may be technically correct, the provision of these numbers as a comparison does not provide accurate or appropriate context within which to view that PSC number as an EBFM indicator. The significance of each salmon, versus each pollock, is measured by two very different rubrics. In this and most cases, pollock is measured as metric tons of marketable food protein. Salmon, on the other hand, should be viewed in the context of food sovereignty and brood capacity. That is

particularly true at times when salmon conservation is urgently focused on the number of fish returning to rebuild struggling runs, as it is now. Without appropriate context, we are left with an incomplete and possibly distorted view of the impact of individual fish taken as PSC. When considering salmon PSC as an ecosystem factor in setting TAC levels, we need to appropriately identify and weigh the relevance of those salmon to critical conservation needs.

The current state of the Bering Sea ecosystem is deeply alarming. The culprits of change are multifaceted and interconnected; however, options for meaningful action do exist and are within the authority of this regulatory body. While we must acknowledge the role that climate change is playing in making the status quo unsustainable, we must also recognize the limitations of the Council in impacting the global scale of the climate change issue. However, assessing the ecosystem-wide impact of fisheries management decisions and taking iterative steps to mitigate those impacts is well within the Council's purview.

The definition of what is sustainable has to evolve. As fisheries management systems strive to make fisheries more climate resilient, the 8th national meeting of the Scientific Coordination Subcommittee of the Council Coordination Committee (SCS8) in August 2024 provides valuable insight on potential directions for developing and implementing procedures for better accounting of biological, economic, and socioeconomic information throughout the harvest specifications process. Broadening the factors considered by the SSC and the Council during the harvest specification process which are inclusive of community well-being, culture, diverse knowledge and values, habitat, bycatch tradeoffs, predator/prey relations as well as economics will strengthen our management systems in a changing marine environment.

Conditions in the Bering Sea ecosystem strongly indicate the need for increased precaution within TAC setting. Considering myriad indicators of ecosystem stress, AMCC believes that the suggested TACs exceed the precautionary approach necessary to sustainably manage the groundfish fishery as part of an interconnected ecosystem. We ask that the Council consider reductions to groundfish TACs as a means of incorporating additional buffers for ecosystem resilience at a time of great uncertainty. This recommendation urges a resilience and abundance-minded management approach, in which the stability of seafood-dependent businesses and communities is protected through critical conservation of at-risk species and habitat, contributions to overall biodiversity, and support of ecosystem integrity. The ecosystem value of fish left in the water should be considered an inherent part of optimum

Alaska Marine Conservation Council

yield, rather than foregone harvest. Caution that protects abundance is an investment in future returns.

Continuous review of current or future fishing impacts on stock health, and comprehensive ecological analysis to support responsible decision-making, is critical to the conservation of our marine resources and ecosystem health.

Thank you for considering our comments.

Respectfully,

Michelle Stratton

Michelle Stratton
Fisheries Scientist
Acting Executive Director