



North Pacific Fishery Management Council  
1007 West Third Avenue, Suite 400  
Anchorage, AK 99501

**Re: Agenda Item C5 – Groundfish Harvest Specifications**

Dear Chair Drobnica and Council Members,

On behalf of the Alaska Marine Conservation Council (AMCC), thank you for the opportunity to provide comments on the Council's groundfish harvest specifications process. AMCC works to protect the long-term health of Alaska's marine ecosystems, sustain our fisheries, and support thriving fishing communities. We recognize and appreciate the Council's decades of leadership in science-based fisheries management. At the same time, we urge the Council to adopt a more precautionary approach to setting Total Allowable Catch (TAC) levels to better account for the increasing ecological and community impacts of bycatch.

For Alaska's small-boat fishermen and rural communities, these losses are deeply felt. Subsistence harvesters, river communities, and independent fishermen directly experience the impacts of bycatch. Every salmon caught as bycatch is one fewer salmon available to support food security in river communities, and every halibut discarded at high mortality rates reduces opportunities for local longline fleets that depend on halibut for their livelihoods. These public resources are essential to Alaska's culture, economy, and daily life.

AMCC recognizes that the pollock industry is one of the largest and most economically influential fisheries in the nation, providing a significant share of the U.S. seafood harvest, substantial economic value, and stability to the supply chain. However, the scale of its footprint in Alaska comes with responsibility. The challenge is not to diminish pollock's role, but to reduce its impacts. We must find a way to harvest pollock without doing so at the expense of the resources that Alaskans depend on. This is not a calculation that can be solved with percentages or ratios. It is a real-world crisis, where food security, cultural continuity, and small-boat fishing opportunities are already in decline. One fishery may serve as a powerful economic driver, but the other represents the lives, families, and communities of its people. These are not equivalents and cannot be compared on the same scale.

The Council bears the immense responsibility of determining how industrial, small, and family-scale fisheries can coexist in the future. That responsibility goes far beyond the technical task of balancing harvest levels against bycatch rates. It requires looking beyond percentages and ratios to recognize the full impact of total bycatch numbers and to confront what those losses mean for Alaska's people and ecosystems. When removals accumulate year after year, their effects compound, weakening species resilience, undermining cultural continuity, and

limiting opportunities for future generations. Bycatch cannot be treated as a secondary metric; it is a direct indicator of loss that diminishes both ecological integrity and community well-being.

The fishing industry, managers, and researchers have invested significant time, money, and innovation into improving gear, practices, and monitoring. These efforts have made a difference and deserve recognition. Despite this progress, the total number of bycatch species remains alarmingly high. When TACs are set, they effectively determine how much bycatch will be removed from the water, since each metric ton of target catch carries an average bycatch rate. Presenting bycatch only as a percentage of the target harvest can obscure the true scale of removals. A rate that appears low on paper may still result in tens of thousands of salmon, halibut, or crab being caught and killed. Each of these species holds ecological, cultural, and economic importance far beyond the boundaries of the target fishery.

While no single year of bycatch may seem catastrophic, the cumulative and compounding effects over decades cannot be overlooked. Consistent removals deplete the genetic diversity of vulnerable populations. Genetic studies of Chinook salmon caught in the Bering Sea pollock fishery, for example, have shown the wide-ranging origins of bycaught salmon. Each loss reduces the genetic and population diversity that supports resilience to climate change and environmental variability. Once this diversity is lost, it cannot be easily restored.

Bycatch is not just a numbers issue; it is an ecosystem issue. Removing species such as crab, halibut, and salmon alters predator-prey relationships and disrupts community-level food webs. These removals compound the pressures already placed on marine ecosystems by climate-driven changes, creating cascading risks that affect the health and resilience of Alaska's oceans.

#### **Considerations for the Council as it Reviews TACs:**

- **Recognize the full extent of bycatch.** When assessing TACs, it is important to consider both absolute bycatch figures and percentages, so the real ecological and community impacts of removals are clear.
- **Assess ecosystem-level impacts.** Beyond individual species, TAC decisions should consider how bycatch influences predator-prey relationships, community food webs, and overall ecosystem health.
- **Consider long-term and cumulative effects.** Even if annual bycatch seems manageable, repeated removals over decades can erode genetic diversity, weaken species' resilience, and affect the cultural and economic foundations of communities.
- **Evaluate community implications.** The Council should consider how bycatch impacts small-boat fishermen, subsistence harvesters, and rural communities, understanding that losses of salmon, halibut, and crab have direct social, economic, and cultural effects.

- **Maintain transparency.** Clear and accessible reporting of bycatch trends alongside TAC decisions helps communities and stakeholders understand the real-world effects of management choices, supporting accountability.

The Council's leadership has made Alaska's fisheries a global model of sustainable management. Authentic leadership requires continuous adaptation of the system as new science and information become available. Bycatch is accumulating, and its cumulative ecological and community impacts are too significant to be addressed through incremental adjustments alone. By keeping in mind the full scale of bycatch, the long-term and ecosystem-level consequences, and the real-world impacts on Alaska's fishing communities, the Council can make TAC decisions that better reflect the complex realities of these fisheries. Taking this approach under the precautionary principle would bring management closer to the Council's statutory obligations to minimize bycatch, maintain healthy ecosystems, and support thriving, resilient fishing communities.

Thank you for considering our comments.

Respectfully,

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