



ALASKA MARINE
COMMUNITY COALITION

May 28, 2026

Angel Drobnica, Chair
North Pacific Fishery Management Council
1007 West 3rd Ave., Suite 400
Anchorage, Alaska 99501

Re: B2 NMFS Management Report, Fishmeal Disposition of Prohibited Species Catch

Dear Chair Drobnica and Council Members:

On behalf of the Alaska Marine Community Coalition (AMCC), thank you for the opportunity to comment on the North Pacific Fishery Management Council's (the Council) consideration of the National Oceanic and Atmospheric Administration's (NOAA) Regional Administrator Johnathan M. Kurland's March 13, 2026, letter. AMCC is a fishermen-founded and fishermen-led organization working to advance sustainable fisheries, healthy marine ecosystems, and thriving fishing and subsistence communities across Alaska. AMCC's work is grounded in the principle that fisheries management must be ecologically credible, publicly accountable, and responsive to the communities and ecosystems most affected by Council decisions.

While the conversion of retained prohibited species catch (PSC) into fishmeal, fish oil, or bone meal may reduce waste and provide processing efficiencies, it raises questions about accountability, incentives, reporting, and public trust. Accordingly, AMCC requests that the Council initiate a public discussion paper or initial review before this interpretation is expanded, standardized, incorporated into future regulatory action, or relied upon across additional fisheries or monitoring programs.

Regional Administrator Kurland's letter indicates that current regulations do not prohibit processors in the Gulf of Alaska (GOA) from converting PSC into fishmeal, fish oil, or bone meal. This issue arose in the context of retained PSC under the trawl electronic monitoring (EM) program.

AMCC supports improved monitoring, accurate accounting, and management systems that make bycatch visible rather than allowing it to be discarded—unseen—at sea. We also recognize the

practical challenge Regional Administrator Kurland identifies: as more fisheries move toward full retention, EM, and dockside accounting, vessels and processors need clear direction on how retained PSC should be handled. However, the question—*what happens to PSC after it is retained and landed*—is not merely an operational detail. Allowing prohibited species to be converted into saleable products raises broader policy questions that need to be reviewed through a transparent Council process.

PSC are species that federal fisheries are not allowed to target and that are subject to strict accounting because of their ecological, cultural, subsistence, commercial, and public value. For many Alaskans, especially salmon-, halibut-, and crab-dependent communities, PSC represents fish and crab removed from the ecosystem and other users, often amid declining runs, reduced directed fishing opportunity, subsistence restrictions, and deep public concern about bycatch accountability.

AMCC recognizes that reducing disposal waste after PSC has already been killed may be preferable to discarding it offshore. However, waste reduction after the fact is not the same as reducing bycatch, bycatch mortality, or the ecosystem and community impacts of prohibited species catch. Any disposition policy should remain clearly secondary to the Council's core obligation to avoid and minimize PSC to the extent practicable. The Council should still evaluate whether processor revenue, avoided disposal costs, delivery logistics, plant efficiency, or normalized handling pathways could create indirect incentives or reduce pressure to avoid PSC.

Additionally, even if fishmeal, fish oil, or bone meal are relatively low-value products, the policy implication is significant: PSC would enter a commercial product stream. That may be a practical disposition pathway, but it should be accompanied by public reporting, clear limits, and Council review. The Council should also consider whether different treatment is warranted for different PSC species, fisheries, gear types, monitoring programs, and regions.

Based on the reasons stated above, AMCC recommends that the Council request a public discussion paper or initial review that (1) describes the current legal interpretation, (2) evaluates the status quo, and (3) identifies a reasonable range of policy options before this interpretation is expanded, standardized, incorporated into future regulatory action, or relied upon across additional programs. That review should examine whether safeguards are needed to ensure commercial use of PSC-derived products does not undermine the Council's bycatch minimization obligations.

This issue is especially sensitive because the public is already being asked to trust complex monitoring, accounting, and incentive systems in fisheries with significant bycatch impacts. If prohibited species can be retained, landed, processed, converted into fishmeal, and sold, the public deserves to understand how much PSC enters that pathway, which species are involved, how the activity is monitored, and whether it affects fleet or processor behavior.

Thank you for your consideration.

Sincerely,

Michelle Stratton

Michelle Stratton
Executive Director