

Enforcement Committee
North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, Alaska 99501-2252

March 26, 2025

RE: Review of C3 MRA Adjustments

Dear Co-Chair Cheeseman, Co-Chair Williams and Members of the Enforcement Committee,

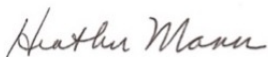
Midwater Trawlers Cooperative (MTC) is a trade association representing 33 trawl catcher vessels that operate in Alaska and on the West Coast. Alaska Groundfish Data Bank represents both trawl catcher vessels and shoreside processors in the Gulf of Alaska (GOA). Thank you for the opportunity to provide comments to the Enforcement Committee in regard to the review of C3 Maximum Retainable Amounts (MRA) adjustments. MTC and AGDB appreciate the Agency's efforts to simplify a network of complex regulations and Council Staff's work in this analysis. We'd like to briefly speak to some key considerations to aid in the Enforcement Committee's discussions at their March 27, 2025 meeting.

MRAs are important regulatory tools that allow the Agency to manage the incidental catch of non-target species and are interrelated to directed fishing definitions which further dictate management programs and many different regulatory requirements, including gear prohibitions and protection areas. We understand their importance but are supportive of the improvements and clarifications in this paper to ensure our vessels can comply and reduce regulatory discards. As the Purpose and Need states, *"This action is necessary to clarify current MRA regulations, make MRA calculations easier, reduce regulatory discards, and address medical, mechanical, or weather issues that can impact MRA calculations."* As you consider any potential enforcement concerns for alternatives and options in this analysis, it's important to remember four key points:

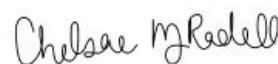
- This action does not change or increase any MRA percentages; vessels will not be able to increase incidental harvest of non-target species.
- MRAs are not the only control on the harvest of incidental species. Most species in the MRA tables (Table 10 for GOA, Table 11 for BSAI, Table 30 for Central GOA Rockfish Program), not including ecosystem component species, have stock assessments and go through the annual specification progress where Total Allowable Catch (TACs) are set annually. The Agency manages all harvest towards those TACs and can place any species on prohibited species status, preventing retention, once a TAC has been exceeded.
- Fishing vessels in Alaska overwhelmingly want to comply with regulatory requirements. However, fishing is not grocery shopping and vessels do not have the ability to always avoid incidental species or control harvest to exact amounts. We appreciate any effort on the Agency and Enforcement's behalf to support simplification and clarification of MRA requirements, which will improve the ability of vessels to remain in compliance.
- We support the analysis' conclusion that instantaneous MRAs are difficult to enforce for catcher vessels and support moving to offload MRAs, which will reduce regulatory discards. Reducing unnecessary regulatory discards is a conservation benefit and a goal we should all be striving for.

Thank you again for the opportunity to provide written comment.

Sincerely,



Executive Director
Midwater Trawlers Cooperative



Assistant Director
Alaska Groundfish Data Bank

