November 26, 2025

North Pacific Fishery Management Council
1007 W. 3rd Avenue, Suite 400
Anchorage, AK 99501

RE: BSAI Groundfish Harvest Specifications

Dear Chair Drobnica and Council Members,

United Catcher Boats (UCB) is a trade association representing the Bering Sea and Aleutian Islands trawl catcher vessel sector.

We support the 2026 BSAI harvest specifications that were initially adopted by the Council in December 2024 and published in the Federal Register in March 2025. The Plan Team reaffirmed these specifications at its September 2025 meeting, recommending 2026 and 2027 OFLs and ABCs that align with the previously adopted 2026 values. This consistency between the Council and Plan Team reflects a stable, transparent, and science-based process.

The Groundfish Plan Team (GPT) in September 2025 recommended approval of the 2026 harvest specifications for the proposed rule for 2026 and 2027. The SSC then recommended approval of the preliminary BSAI groundfish harvest specifications as provided by the BSAI GPT at the October 2025 NPFMC meeting. Due to the federal government shutdown, it was acknowledged that assessment delays may necessitate use of the most recently vetted specifications. This approach is consistent with the document: *Groundfish Final Harvest Specifications Process* for December 2025 issued November 17, 2025, by the Council staff. As noted in that guidance, "Catch reports do not incorporate updated survey information, and for stocks with catch reports, harvest specifications are typically rolled over from prior years, because limited new data are available that would warrant a change in OFLs and ABCs."

While some may question whether this action represents sufficient public process, it is important to emphasize that the 2026 specifications were reviewed and affirmed through two transparent and science-based forums: the Council's public meeting in December 2024, which included formal SSC and Plan Team input, and the BSAI GPT's public meeting in September 2025. Both provided opportunity for public testimony, relied on published documentation, and followed established Council procedures. These specifications reflect the best scientific information available (BSIA), particularly in light of the federal shutdown that prevented the November SAFE reports and stock assessments. While some fishery participants experienced variability in catch rates and conditions during the B season, the absence of strong conservation signals in the latest peer-reviewed stock assessments continues to support keeping the current specifications in place consistent with the best available science. The reports show there is no immediate conservation concern, and maintaining the previously adopted specifications is the only reasonable option to avoid destabilizing the fisheries. Maintaining the existing specifications under these conditions safeguards food system continuity and market stability. Furthermore, there is no realistic path for the SSC to reopen assessments,

generate scientific feedback, and arrive at a defensible alternative within the limited timeframe of a day-and-a-half SSC meeting.

UCB urges the Council to maintain the annual stock assessment cycle. The North Pacific remains the most data-rich region in the country, and the Council's annual process sets a national standard. While most other Fishery Management Plans (FMPs) operate under two- or three-year assessment and specification cycles, the NPFMC process ensures responsive management and integration of the most current data inputs. Missing the 2025 cycle due to the federal shutdown underscores how essential it is to protect the schedule to preserve the integrity of the process.

The 2026 specifications reflect the best available science as of September 2025, were reviewed through fully public processes, and are supported by independent survey data. Maintaining these values is the most stable and scientifically sound path forward and aligns with federal requirements under the Magnuson-Stevens Act, National Standard 2.

Thank you for your continued stewardship of the BSAI fisheries.

Sincerely,



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