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North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

RE: D-6 Bering Sea Fishery Ecosystem Plan

Dear Chairman Kinneen and Council members:

Ocean Conservancy¹ submits the following comments on the Bering Sea Fishery Ecosystem Plan (FEP) and associated Action Modules. We thank the North Pacific Fishery Management Council (the Council), the Ecosystem Committee, the Bering Sea FEP Plan Team and Council staff for continuing to develop the Bering Sea FEP. The Bering Sea FEP is an important step as the Council implements Ecosystem Based Fishery Management (EBFM). At this meeting, **we urge the Council to approve the workplans for the Climate Change and TK/LK/Subsistence action modules and to initiate a call for nominations for the task forces associated with the two modules as detailed below. We also encourage the Council/Plan Team to continue to develop Ecosystem Indicators, which are an important tool to inform fishery management amidst a rapidly changing climate.**

We commend the Council for prioritizing and beginning work on the Climate Change Action Module. The productive Bering Sea ecosystem faces challenges that include ocean acidification, mortality and decreased productivity of key species, and changes in the geographic distribution of many important fish stocks.^{2,3} These challenges necessitate proactive climate-resilient management that can be furthered by implementation of the Climate Change Action module.

We are also encouraged by the progress toward integration of Traditional Knowledge (TK) in the Council process via the Core Bering Sea FEP and TK/LK/Subsistence Action Module. Enhancing the role of TK in the Council's management strategy will strengthen efforts to utilize EBFM while bolstering information sharing and communication with Alaska Native Tribes.

The task forces will play a very important role in the development and ultimate success of the action modules. The task forces must include a diverse group of stakeholders beyond simply agency representation. The climate change module task force should reflect the inter-disciplinary nature of

¹ Ocean Conservancy is a non-profit organization working to protect the ocean from today's greatest global challenges. Together with our partners, we create science-based solutions for a healthy ocean and the wildlife communities that depend on it.

² Wilson, J.R., Lomonico, S., Bradley, D., Sievanen, L., Dempsey, T., Bell, M., McAfee, S., Costello, C., Szuwalski, C., McGonigal, H. and Fitzgerald, S., 2018. Adaptive comanagement to achieve climate-ready fisheries. *Conservation Letters*, 11(6).

³ Laffoley, D.D.A. and Baxter, J.M. eds., 2016. *Explaining ocean warming: Causes, scale, effects and consequences*. Gland, Switzerland: IUCN.

the task at hand and include agency, tribal and NGO representatives. The task force for the TK/LK/Subsistence module should include both TK/LK knowledge holders as well as non-economic social scientists that have expertise in working with TK/LK and subsistence as outlined in the draft workplan. We encourage the Council to issue the call for nominations widely, and consult with Alaska Native organizations as to how to best distribute a call for nominations for this Committee.

Finally, ecosystem indicators are a key component of the FEP. Selection of ecosystem indicators and thresholds has been identified as one of the primary elements of next generation FEPs and EBFM by NOAA, NGOs and academia.⁴ In order to ensure the Bering Sea FEP becomes an effective, action-informing document, it will be necessary to link with the Ecosystem Status Report (ESR) to update current indicators and explore options for new indicators. Using indicator species as a proxy for ecosystem health and function can be both a cost- and time-efficient measure.⁵ We are encouraged by the momentum within the Bering Sea FEP Plan Team to update indicators and thresholds within the Core Bering Sea FEP and ESR, and support continued development of indicators, particularly species and “climate-informed reference points” that directly consider climate change impacts and risks.

The final Ecosystem Based Fishery Management Plan (EBFM) Alaska Regional Implementation Plan⁶ states the Bering Sea FEP is to be used as a “guide to action items,” and it is expected that “long-term ecosystem research needs will continue to be identified through the Bering Sea FEP process.” The linkages between the Bering Sea FEP and the EBFM ARIP underscore the important policy-informing role the Bering Sea FEP and Action Modules will play in shaping the Council’s adaptive management capacity and EBFM standards nationally.

Thank you for your continued dedication to this meaningful work, and we look forward to working with you to continue to develop the Bering Sea FEP.

Sincerely,



Rebecca Robbins Gisclair
Sr. Director, Arctic Programs

⁴ Levin et al. 2009 Integrated Ecosystem Assessments. Developing the Scientific Basis for EBM of the Ocean. *PLoS Biol* 7:e1000014; Lenfest 2016; NMFS EBFM Implementation Draft Plan 2018; Busch, D.S., Griffis, R., Link, J., Abrams, K., Baker, J., Brainard, R.E., Ford, M., Hare, J.A., Himes-Cornell, A., Hollowed, A. and Mantua, N.J., 2016. Climate science strategy of the US national marine fisheries service. *Marine Policy*, 74, pp.58-67.

⁵ Carignan V, Villard M-A . 2002. Selecting indicator species to monitor ecological integrity: a review. *Environ Monit Assess* 78:45–61.

⁶ NMFS. 2019. Ecosystem Based Fisheries Management. Alaska Regional Implementation Plan. 23 pp.

<https://www.fisheries.noaa.gov/national/ecosystems/ecosystem-based-fishery-management-implementation-plans>