



# North Pacific Fishery Management Council

Simon Kinneen, Chair | David Witherell, Executive Director  
1007 W. 3rd Avenue, Suite 400, Anchorage, AK 99501  
Phone 907-271-2809 | [www.npfmc.org](http://www.npfmc.org)

March 28, 2023

## North Pacific Fishery Management Council Comments NOAA Fisheries Draft National Seafood Strategy

### To Whom It May Concern:

The North Pacific Fishery Management Council appreciates the opportunity to comment on the Draft National Seafood Strategy. We support the purpose of the National Seafood Strategy and the goals of sustainable seafood production, climate-ready fisheries and communities, market access and economic competitiveness, and a growing and diverse workforce. Our focus of these comments is on Goal #1, sustaining U.S. wild capture production.

The North Pacific Council has a successful record of science-based, sustainable fisheries management since the Magnuson-Stevens Fishery Conservation and Management Act was implemented in 1976. Each year for the past 40 years, the sustainable harvest of groundfish in the North Pacific totals 2,000,000 metric tons or greater. Harvest off Alaska currently accounts for over 60% of the total U.S. catch and is critical to ensuring food security for the nation due to both the size and the stability of the annual yield. These yields are a direct result of Council management for sustainable fisheries that provide benefits for harvesters, processors, recreational and subsistence users, and fishing communities, which (1) are maintained by healthy, productive, biodiverse, resilient marine ecosystems that support a range of services; (2) support robust populations of marine species at all trophic levels, including marine mammals and seabirds; and (3) are managed using a precautionary, transparent, and inclusive process that allows for analyses of tradeoffs, accounts for changing conditions, and mitigates threats. The North Pacific Council has a four-decade track record of demonstrating that sustainable fisheries production is possible when based on robust fisheries science and conservative fishery management policies.

Sustainable wild capture fisheries require sound science and monitoring programs, particularly in the face of climate change. The North Pacific Council has invested significant time and resources, along with NOAA Fisheries, to initiate several efforts to better understand and respond to ecosystem effects in the marine environment driven by climate change. The Council reviews annual Ecosystem Status Reports that highlight trends and anomalies tailored toward supporting the Council's annual process to set groundfish harvest specifications. The Council has also initiated a multi-year effort to evaluate the vulnerability of key species and fisheries to climate change and to strengthen resilience in regional fisheries management. A recently published Climate Readiness Synthesis evaluates whether North Pacific Council management tools, stock assessments, and information onramps are able to accommodate and consider the unprecedented conditions and unique challenges presented by long-term climate change.

To maintain sustainable production in the North Pacific and improve our resilience in the face of increasing change in the ecosystem, NOAA must prioritize fisheries-independent and -dependent surveys. These surveys are the fundamental data source for groundfish stock assessments and ecosystem assessments, and are the most critical responsibility of the NOAA Alaska Fisheries Science Center to be able to meet its mission of monitoring the health and sustainability of living marine resources and their

habitat. The Council would also like to stress the importance of re-evaluating and potentially expanding survey designs as conditions and stock distributions change.

Adequate funding for fisheries management and science surveys is critical to meeting the goal of sustaining or increasing wild seafood production. Without significant increases to the base funding for NOAA Fisheries Science Centers, the scientific research possible will be insufficient for the Councils to sustain or increase fisheries production in the U.S. With reduced funding and staffing for research, the Alaska Fisheries Science Center has already had to drop critical surveys of the slope region and the Gulf of Alaska. With fish and crab moving deeper and northward due to ocean warming (e.g., pollock, Pacific cod, and snow crab), it is imperative to secure permanent funding necessary to provide comprehensive and consistent data for stock assessments and research projects, including in the northern Bering Sea, to understand and manage for the impacts of climate change. Inadequate scientific surveys result in an unnecessary reduction in sustainable yields of wild stocks. Under the Council's precautionary catch control rules, less scientific information increases the uncertainty buffers, resulting in lower annual catch limits and reduced yields. It is also critical to ensure that all necessary ecosystem scientist positions and stock assessment scientist positions at the Alaska Fisheries Science Center are filled and fully funded. Fewer assessment biologists necessitate longer intervals between assessments, which will potentially have adverse effects on the sustainability of marine resources and reduce the U.S. seafood supply.

Additional funding for the Regional Fishery Management Councils is necessary to support effective and efficient management. Costs for the Councils (including personnel, health care, meeting, and travel costs) are rising at much faster rates than the small incremental increases received for Council funding. Combined with the additional mandatory requirements the Councils must complete over time (including regular program reviews, allocation reviews, essential fish habitat reviews, etc.), the ability of the Councils to manage for optimum yields, provide effective management, and react to changes in ocean conditions is greatly reduced without sufficient funding.

Lastly, we suggest that the implementation plan for increasing seafood production under Goal #1 consider ways to reduce discards of wild fish, increase utilization, and reduce waste. This may include evaluating regulatory barriers that force discards of edible wild seafood (e.g., size limits, bag limits, retention limits), as well as development of management measures and marketing support that could encourage retention of fish that are discarded due to being a currently unmarketable species or of a size that is not profitable to retain or process. We suggest that, as part of the implementation plan, NOAA fisheries highlight these management challenges as priorities to be addressed, and work with the regional fishery management councils and the fishing industry to develop alternative management approaches and incentives to increase retention and utilization of wild seafood.

In conclusion, the North Pacific Fishery Management Council supports the Draft National Seafood Strategy and its goals. However, we suggest incorporating the changes mentioned above to ensure its success as you develop an implementation plan. Please continue to include the Councils as you finalize the strategy and develop a timeline for its implementation. We thank you for considering our comments.

Sincerely,



Simon Kinneen  
Chair, NPFMC