



North Pacific Fishery Management Council

Simon Kinneen, Chair | David Witherell, Executive Director
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March 18, 2019

Ms. Erin Wilkinson
Office of Sustainable Fisheries
1315 East-West Highway
Silver Spring, MD 20910

Dear Ms. Wilkinson:

On behalf of the North Pacific Fishery Management Council (Council), I am providing this letter in support of the research proposal submitted to the NOAA Bycatch Reduction Engineering Program by Alaska Bering Sea Crabbers, the Bering Sea Fishery Research Foundation, and the Natural Resources Consultants to test gear modification in order to avoid king crab and snow crab bycatch in Bering Sea Pacific cod and Pacific halibut pot fisheries.

In October of 2018, the Council took action to recommend allowing the use of pot gear in the commercial halibut fishery in the Bering Sea and Aleutian Islands (BSAI) for those that have available halibut Individual Fishing Quota. This action was in response to a growing concern of killer whale depredation on hook-and-line gear in the BSAI. These interactions with whales have become extremely problematic; reducing catch per unit of effort and increasing fishing costs for halibut quota share holders. The purpose of this action is to allow for more efficient harvest of the halibut resource by decreasing the wastage of legal-size halibut that is required to be discarded in the BSAI sablefish pot fishery and to allow for the possibility of reduced whale depredation of halibut off of hook-and-line gear by providing the option to switch to pot gear in order to commercially target halibut.

This will be a novel gear type for commercial halibut fishing in waters off of Alaska, thus bycatch minimization is of particular importance in its development. Any increase in fishing with pot gear is likely to increase bycatch of crab species. Moreover, the expected increase in tunnel size of pots to allow for more effective harvest of halibut could also contribute to a shift in the type and magnitude of bycatch by vessels that previously relied on hook-and-line gear. Of particular concern is the incidental catch of Pribilof Island blue king crab, which is an overfished stock. In addition to area closures for pot gear, which seek to protect this species, the Council noted the need to both minimize bycatch in a halibut pot fishery, as well as increase potential for escape and survival of crabs that make their way into pots intended to catch halibut.

At this time, ideal specifications of escapement mechanisms or specific pot designs to minimize the bycatch of prohibited catch and undersized species are unknown. The Council acknowledged the iterative nature of developing a new gear type for halibut in the BSAI and did not want to prevent innovation through strict regulatory gear specifications. Not defining specific dimensions of escapement rings or slots in regulations at this time was intended to allow the fleet flexibility to test different gear specifications to minimize bycatch most effectively. As part of this action, the Council requested that industry work together to explore ways to reduce crab bycatch and report back. The Council is highly supportive of this industry-led innovation which could be particularly responsive in addressing the range of bycatch issues that may be experienced with a new gear type.

Moreover, lessons learned about ideal gear specifications to minimize bycatch through this collaborative research effort may also be beneficial in the existing Pacific cod pot fishery, which also has crab bycatch. This proposal is directly responsive to the Council's request of industry. Bringing expertise on pot design and bycatch escape mechanisms that have been effective in the crabbing industry, the proposers intend to coordinate efforts with current pot cod harvesters and aspiring halibut pot harvesters, as well as gear manufacturers to work through bycatch reduction ideas and gear design solutions. This proposal is an industry-led initiative at bycatch reduction for pot gear which will form partnership with the National Marine Fisheries Service and the Alaska Department of Fish and Game. We are optimistic that advancing this area of research can lead to practical bycatch solutions benefiting multiple fishing sectors.

The Council fully supports this proposal to identify pot design opportunities to minimize bycatch for existing and developing fisheries and we greatly appreciate your consideration.

Sincerely,



David Witherell
Executive Director

Enclosure(s)

cc: Simon Kinneen
Jamie Goen, ABSC
Scott Goodman, BSFRF
Kyle Antonelis, NRC, Inc