



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
1315 East-West Highway
Silver Spring, Maryland 20910
THE DIRECTOR

Mr. David Witherell
Executive Director
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501

MAY 17 2019

Dear Mr. Witherell:

Thank you for your letter regarding the recent update to the National Bycatch Report (NBR). I appreciate the concerns raised by the North Pacific Council regarding the NBR over the years. The Council has a long and impressive record of monitoring and managing bycatch in its fisheries, and bycatch also remains an important focus for NOAA's National Marine Fisheries Service (NMFS).

Based on internal and external stakeholder concerns, NMFS asked an internal working group of bycatch experts to review the NBR and provide agency leadership with options for improving it. The working group is developing an options paper for NMFS leadership.

Your suggestion to categorize future NBR bycatch estimates according to whether they are regulatory or economic discards is worth considering, although it might require modifications to how observers collect data. Observers in the North Pacific currently do not identify the reason for any discards of bycatch or target species. There may be multiple reasons for discard of the same species even during a single catch event. For example, some halibut may be too small to be retained legally, and some halibut may be unmarketable due to sand flea damage. On the other hand, observers with the West Coast Groundfish Observer Program record reasons for discards, based primarily on input from captains. This information may not be completely reliable based on the situation.

In any case, NBR editors in the future could draw general conclusions about regulatory versus economic discards through examination of related regulatory requirements for some fisheries (i.e., crab, halibut individual fishing quota, or Gulf of Alaska pollock), as well as provide additional context for discard reasons in NBR tables and text.

I look forward to continued dialogue on this topic as we identify improvements to the NBR, and I appreciate your leadership in bycatch monitoring and management.

Sincerely,

Chris Oliver

