

Pollock Trawlers – Who Are Expected To Oppose The Basic Equity And Conservation Improvements In H.R. 4690 - Are Threatening Food Security In Native Alaskan Communities

SUMMARY: Pollock factory trawlers operated by big commercial fishing companies like Trident and American Seafoods – and represented by lobbying organizations like the At-Sea Processors Association – are catching the salmon and halibut that Alaska Native fishing communities require for cultural and nutritional sustenance.

In 2021 so far, the At-Sea Processors Association's members* have harvested/caught nearly 160,000 salmon as bycatch, leaving less and less for communities that rely on and directly target salmon. Halibut, sablefish, crabs, and numerous other species are also caught and subsequently discarded, with broad ramifications on those stocks and ocean ecosystems.

Despite the consequences of these practices, this bycatch is legal because the trawler industry has captured its regulatory body, the North Pacific Fishery Management Council (NPFMC). Despite urgent calls for help from salmon and other fishermen, the federal fishery management has failed to take any meaningful action to address the damaging practices of the trawler fleet.

In October, NPFMC rejected proposals to reduce bycatch or even to add more native voices to its panel, and instead voted to authorize a study one council member characterized as “redundant.” By maintaining the status quo, NPFMC's actions benefit commercial seafood giants like Trident at the expense of fishery sustainability, Alaska Native fishing communities, and small salmon, crab, and halibut fishers.

** This figure includes all At-Sea Processors Association member vessels except for the Northern Hawk, the vessel operated by the Coastal Villages Regional Fund (CVRF). CVRF is set up by federal statute through the Community Development Quota (CDQ) program to allow Alaska Native communities on the Bering Sea shore a chance to participate in modern commercial fishing. Bycatch from its vessel Northern Hawk is not included in total figures in this document.*

Bycatch From Big Commercial Trawlers Hurts A Variety Of Other Actors In The North Pacific, Including Native Communities And Smaller Commercial Fishers.

Big Trawler Vessels Harvest An Outsized Share Of Salmon, Drawing Complaints From Subsistence Fishers, Smaller Commercial Fishers, And Conservationists

Big Commercial Trawlers Harvest A Substantial Portion Of The Allowable Salmon Quota. “Alaska's commercial fishermen have been speaking out against big trawlers for years, complaining that the large vessels in federal waters are scooping up mature and juvenile fish. [...] Federal fisheries data shows trawlers in the North Pacific took about a tenth of the chinook — or king salmon — caught by Alaska's commercial salmon fleet last year. And those numbers are tracking the same this year. But none of that catch happens on purpose.” [KTOO, 04/22/21]

Commented [MOU1]: All companies operating catcher processor vessels in the Bering Sea Alaska pollock fishery partner with, or are owned in whole or in part by, Western Alaska Community Development Quota (CDQ) Groups. Revenue from this fishery provides critical resources to Western Alaska communities in need.

Commented [SC2]: This statement (1) conflates different sectors (the Bering Sea pollock fleet does not have significant encounters with halibut because it is midwater trawl fleet); and (2) implies, in contradiction of the best available science, that bycatch of salmon is having a significant impact on Western Alaska salmon returns.

Commented [SM3]: For context, in 2021, directed commercial salmon fisheries in Alaska state waters harvested 233.8 million salmon. Additionally, Bering Sea salmon bycatch is of mixed stock origin, and includes significant quantities of non-U.S.-origin hatchery salmon.

Commented [SC4]: The North Pacific Fishery Management Council (NPFMC) manages all stocks within its jurisdiction using science-based catch limits. Any amount of bycatch taken in the pollock sector is accounted for in the annual catch limit setting process (just as it is for all other non-trawl, non-pollock fisheries and their respective bycatch). If bycatch causes a conservation impact on other stocks, it would be recognized in stock and ecosystem ... [1]

Commented [SC5]: All fisheries have bycatch and it is all “legal” because it is intensively managed and accounted for by the National Marine Fisheries Service. National Standard 9 was drafted in recognition of this fact.

Commented [SM6]: Groundfish trawl fisheries primarily fall under federal jurisdiction in Alaska. Trawl stakeholders participate in the NPFMC's public process, along with all other sectors and community and conservation interests. Fishery management plans reflect a balance of compet ... [2]

Commented [SC7]: As noted in my written response, the NPFMC has taken many actions to reduce bycatch, and have reduced Chinook bycatch by 89% since its peak in 2007.

Commented [SC8]: The proposals presented during a review of genetic composition of salmon bycatch were to reduce Chinook bycatch to zero in the pollock fishery. Like any fishery, the pollock fishery cannot exist without some level of bycatch, and thus the proposals would have sh ... [3]

Commented [SC9]: The NPFMC's NOAA General Counsel representative explicitly noted on the record that the Councils are precluded from engaging in lobbying activity. This rationale was noted for not being able to support legislation that would add two Tribal seats to the Coun ... [4]

Commented [SC10]: The figures are not correct, showing some catcher vessels that are not part of the “at-sea” fleet, or At-sea Processors Association.

Commented [MOU11]: All catcher processor vessels harvest CDQ quota; and Northern Hawk harvests some non-CDQ quota. The choices made about the presentation of the data here show a fundamental misunderstanding about the scope and operation of the vital CDQ program within t ... [5]

Commented [SC12]: None of the news articles excerpted below contain any actual scientific information or analysis, just unsupported statements.

- **Small Commercial Fishers And Subsistence Fishers Want To Reduce The Amount Of Bycatch Trawlers Can Harvest.** “Commercial fishermen and others from throughout Alaska are calling for a sea change in Alaska’s fisheries management. Today, fishermen delivered a letter signed by over 300 Alaskans to Alaska Governor Mike Dunleavy and his administration, asking the governor to address the crisis facing Alaska’s Chinook salmon by advocating for a much lower bycatch allowance in the off-shore federally managed trawl fisheries.” [Alaska Sporting Journal, [10/07/21](#)]

Trawlers Are Exceeding Their Bycatch Limits Without Repercussions, Hurting Fishers Who Target A Range Of Seafoods, Including Crab, Halibut And Sablefish. “It isn’t just halibut fishermen who are furious. Last year, trawlers caught more than half a million tanner crab as bycatch in a region where, this year, crab fishermen were prohibited from setting pots because of low population numbers. And over the past two years, longliners who target sablefish—a high-value species with rich, oily flesh—watched as Bering Sea trawlers caught three and then five times their allowable limit of this species without facing fines or other repercussions.” [National Geographic, [04/08/21](#)]

As Of November 1, 2021, At-Sea Processors Association Members Have Already Harvested Nearly 160,000 Salmon As Bycatch In 2021; Simultaneously, The U.S. Department of the Interior Has Noted A Loss Of 190,000 Salmon To Yukon Households

Through November 1, 2021, At-Sea Processor Vessels Have Caught Over 6,000 Chinook Salmon In Trawl Fisheries This Year, As Well As 153,000 Non-Chinook

Bering Sea and Aleutian Island And Gulf Of Alaska Chinook/Non-Chinook Salmon Bycatch Totals From At-Sea Processors Association Member Vessels 01/01/21 - 11/01/21			
Vessel Name:	# Chinook Caught As Bycatch	# Non-Chinook Caught As Bycatch	# Of Hauls Sampled
Alaska Ocean	840	2,320	660
American Dynasty	650	3,696	487
American Triumph	687	19,790	483
Arctic Fjord	340	11,003	439
Arctic Storm	441	19,783	408
Island Enterprise	144	2,803	301
Kodiak Enterprise	118	23,206	269
Majesty	0	15	120

Commented [SC13]: Again, this is not the pollock sector and it also leaves out the fact that last year there was more bycatch in the pot fisheries than there was in the trawl fisheries. Regardless, the consensus by both the science-based Crab Plan Team and the Science and Statistical Committee is that environmental conditions, not bycatch, are responsible for declining crab stocks.

Commented [AE14]: The sablefish stock has experienced record recruitment events since 2016 due to environmental conditions favorable to the stock, and trawl bycatch was not determined to be a conservation concern.

Commented [SC15]: This implies that it is a 1:1 ratio of bycatch, grossly inflating implied impact. These salmon are not all destined for Western Alaska systems, and they would not return in the same year. See my written response for more detail and a summary of available impact information.

Commented [MOU16]: (1) Not all vessels listed below are at-sea processing vessels, once again reflecting the author’s failure to conduct even the most basic fact checks relating to their work; and (2) this borrows from data collected on vessels by Federal observers and shared with the public through the NPFMC – a level of accountability and transparency that is present in almost no other fishery on Earth.

Commented [AE17]: All At-sea Processors Association member vessels are prohibited from participation in any Gulf of Alaska fisheries by the American Fisheries Act. It is unclear whether and how the author intends to include Gulf of Alaska fisheries in this table.

Marcy J	71	1	24
Northern Eagle	578	11,018	412
Northern Glacier	113	43	625
Northern Hawk*	385	9,043	406
Northern Jaeger	435	12,894	405
Ocean Rover	563	21,692	473
Seattle Enterprise	332	11,653	361
Starbound	371	4,740	436
Total:	6,068	153,700	6,632

= Glacier Fish Co.
 = American Seafoods
 = Arctic Storm
 = Trident
 = Coastal Villages

= Aleutian Spray

[NOAA.gov, Accessed [11/01/21](#)]

Salmon Bycatch Totals For Each Member Company Of At-Sea Processors Association & Percentage Of Total 2021 Alaskan Salmon Bycatch In The Bering Strait / Aleutian Island And Gulf Of Alaska Trawl Fisheries				
Company:	# Chinook Caught As Bycatch:	# Non-Chinook Caught As Bycatch:	% Of Total 2021 Chinook Bycatch From The BSAI/GOA	% Of Total 2021 Non-Chinook Bycatch From The BSAI/GOA
Aleutian Spray (Starbound LLC)	371	4,740	2.2%	3.3%
American Seafoods Company	2,913	69,090	32.7%	26.2%
Arctic Storm Management Group, LLC	781	30,786	14.6%	7.0%
Coastal Villages *	385	9,043	4.2%	3.5%
Glacier Fish Company, LLC	953	2,363	1.1%	8.6%
Trident Seafoods	665	37,678	17.8%	6.0%
All At-Sea Processors Association Members Combined	6,068	153,700	72.7%	54.6%

Commented [AE18]: Again, it is important for the committee to understand that At-sea Processors Association vessels are not permitted to target pollock in the Bering Strait, Aleutian Islands or Gulf of Alaska. APA vessels only target pollock in the Eastern Bering Sea.

Total 2021 Chinook/Non- Chinook Bycatch From The BSAI/GOA	11,119	211,323	X	X
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[NOAA.gov, Accessed
11/01/21]

**The Coastal Villages Regional Fund is set up through the Community Development Quota (CDQ) program to allow communities on the Bering Sea shore a chance to participate in modern commercial fishing. Bycatch from its vessel Northern Hawk is not included in total figures in this document.*

In A September 2021 Report, The U.S. Department of the Interior Noted A Loss Of 190,000 Salmon To Yukon Households

USFWS Report To North Pacific Fishery Management Council: “It Is Likely That Yukon Households Will Report Record Low Harvests For Salmon. This Represents The Potential Loss Of Over 190,000 Salmon... To Yukon River Families.” “Subsistence harvest estimates will not be available until after household surveys are completed and results finalized, typically in December. While there may be some incidental harvest of salmon from 4-inch and smaller mesh gear, it is likely that Yukon households will report record low harvests for salmon. This represents the potential loss of over 190,000 salmon (based on historical harvest averages of Chinook and Chum combined) to Yukon River families. Despite salmon fishing closures, run sizes were so low that escapement goals throughout the drainage for Chinook and Chum salmon will likely not be met. While preseason forecasts accurately predicted the resulting run size for Chinook salmon, the Chum and Coho outlooks did not indicate the very poor runs that occurred, despite very poor fall Chum runs in 2020.” [Meetings.npfmc.org, 09/15/21]

- **Indigenous Subsistence Farmers Say That The Collapse Of The Salmon Population Is Causing Physical, Mental, Emotional, And Spiritual Hardship To Their Communities.** “The shortfall in salmon this year hit fishing communities hard, particularly among subsistence fishermen. Amos T. Philemenoff, Sr., president of the Aleut Community of St. Paul Island, wrote to the board that the salmon shortages in the Arctic-Yukon-Kuskokwim region this year have impacted the island’s subsistence traditions. Donations of salmon from commercial harvesters to replace the lost food do not replace the traditions, he said. ‘Our communities have experienced physical, mental, emotional, and spiritual hardship due to the impacts of over-harvest and mismanagement that characterize these Alaska fisheries,’ he wrote. ‘The burden of conservation has fallen on Indigenous (e.g., subsistence) users who are not part of the salmon population collapse.’” [Alaska Journal of Commerce, 10/12/21]

The At-Sea Processors Association And Other Industry Groups Have Resisted Calls To Limit Bycatch

Commented [AE19]: These numbers are factually incorrect, which make the percentages of total bycatch by company and Association in the table erroneous. If the author had read the “explanation” document attached to the data table they used to present this information, they would have seen that the table only includes information from vessels with observers, but is by no means a total estimate of combined BSAI/GOA Chinook/Non-Chinook salmon taken by Federal groundfish fisheries. APA vessels are 200% observed, therefore data from our vessels is complete.

Commented [SM20]: Directed salmon fisheries are managed under the State of Alaska and Department of Interior federal authorities.

Commented [MOU21]: As noted in my written response, the most recent 2019 genetic sampling indicates that almost none of the salmon bycatch in the pollock fishery is from the Middle/Upper Yukon. Specifically, for Chinook it represents less than 1% of bycatch; and for chum it is 0.3% of bycatch. The 2019 genetics data have shown a recent steep decline in the proportion of bycaught salmon from the Middle/Upper Yukon, foreshadowing the run failures that occurred in 2021. To suggest that heartbreaking reductions in Yukon salmon runs are caused by pollock trawl bycatch is contradicted by the science, and distracts from the urgent need to study, understand and respond to the actual causes.

Commented [MOU22]: APA companies have in fact implemented globally-innovative bycatch reduction strategies. APA is committed to maintaining and extending bycatch reduction innovations.

The At-Sea Processors Association Argued That “No Fishery Is Without Bycatch And... That A Moratorium On Salmon Bycatch In The Bering Sea Would Mean A Total Shutdown Of The Pollock Fishery.” “The At-Sea Processors Association — a large industrial trawl organization — said in an emailed statement that no fishery is without bycatch and that’s always other species in the nets or caught on a line. The group argued that a moratorium on salmon bycatch in the Bering Sea would mean a total shutdown of the pollock fishery.” [Alaskapublic.org, 10/14/21]

Commented [MOU23]: APA stands by these accurate statements.

Commented [SM24]: A moratorium on salmon bycatch would leave groundfish fisheries closed due to species intermixing in Bering Sea and Gulf of Alaska fishing grounds. Gear innovations, bycatch hot spot avoidance and other management measures are used to minimize bycatch to the extent practicable. The pollock industry, including Trident Seafoods, has actively developed and improved bycatch avoidance and has accepted or supported NPFMC leading bycatch reporting requirements and accountability measures.

At-Sea Processors Member Trident Seafoods And The Pollock Industry In Alaska Have Routinely Contributed To The Bycatch Problem, Catching Thousands Of Pounds Of Bycatch While Local Communities Struggle To Stay Afloat.

Trident Seafoods Has Been Caught In Multiple Bycatch Scandals, Including Illegally Buying Bycatch Octopus And Taking In Thousands Of Pounds Of Halibut Bycatch.

Trident Was Fined For “Knowingly Buying Illegal Fish” In 2014

Commented [SC25]: Trident was fined in 2014 for buying fish from a pot gear-sector harvester who hadn’t correctly filled out the paperwork needed to complete an emergency medical transfer after the permittee fell gravely ill. Our citation was not related in any way to bycatch.

Trident Faced Charges For Knowingly Buying Illegal Fish From Fisherman With Too Much Octopus Bycatch In 2014. “Trident Seafoods Corporation and two fishermen face multiple charges apiece for various alleged fishing violations in fall 2014... Trident Seafoods faces six unlawful purchase charges for allegedly knowing that the Viking Star was fishing illegally and buying product from the vessel anyway. The charging documents allege that Olsen’s permit was used on six fish tickets between Oct. 2, 2014, and Nov. 3, 2014, but Hanohano signed them although no emergency transfer or authorization allowing Hanohano to use Olsen’s permit had occurred... The documents also say that one of the tickets dated Oct. 21, 2014, allegedly showed 5,533 pounds of octopus, 694 more than what was allowed. The state of Alaska alleges that Trident Seafoods bought the product from those six tickets despite knowing that Olsen’s permit was being used by Hanohano. Olsen, Hanohano and Trident Seafoods all have change of plea and sentencing scheduled for Feb. 4, according to online court records.” [Kodiak Daily Mirror, 01/22/16]

Trident Pleaded No Contest And Was Fined For Single Count Of Unlawful Purchase Of Fish. “All but one of the dozens of charges against Trident Seafoods and two fishermen were dismissed when the case was resolved earlier this month, according to court documents. According to a court log from a change of plea proceeding on Feb. 4, Trident pleaded no contest to a single count of unlawful purchase of fish and was fined \$3,000 with the remaining five charges against them dismissed. The single count was reduced to a violation. Restitution in the case had already been paid, according to the notes.” [Kodiak Daily Mirror, 02/17/16]

Trident Drew Heavy Criticism After Video Showed A Trident Facility Taking In Thousands Of Pounds Of Halibut Bycatch.

Social Media Post Showed Thousands Of Pounds Of Halibut Bycatch At Trident Facility In Kodiak. “Longtime fisherman Erik Velsko says if Trident really cares about halibut and sustainability some things need to change. Velsko recently called out Trident on Facebook posting photos and video of excessive halibut bycatch at the plant that appeared to be from the local trawl fishery and which was going to be turned into fishmeal. ‘Totes full of halibut and you know obviously they had some markings and looked a little damaged. They were not gutted or dressed, as we call ‘em, longline – so the only place they could have come off of was a trawl vessel,’ Velsko said.” [Alaskapublic.org, [06/06/18](#)]

- **Fisherman Alleged There Were 15 Totes, Carrying 1,000 Pounds Of Bycatch At Trident Facility.** “In all, Velsko alleges there were around 15 totes, each containing about one thousand pounds of fish. The images were taken in fall 2017, when a fellow fisherman captured them but wanted to remain anonymous, so Velsko posted the images to his Facebook page this May with a paragraph alleging wastefulness.” [Alaskapublic.org, [06/06/18](#)]
- **Fisherman Who Posted Bycatch Video Claimed That “What Is Happening With Halibut At The Trident Plant In Kodiak Is Legal, But Immoral And Wasteful.”** “Velsko, the fisherman who posted the video, says he believes what is happening with halibut at the Trident plant in Kodiak is legal, but immoral and wasteful, and it was especially upsetting to him in light of recent restrictions on the halibut fishery due to conservation concerns.” [Alaskapublic.org, [06/06/18](#)]

Trident Manager Called The Photos “Disheartening To Say The Least,” But Claimed They Are Taken Out Of Context. The Trident plant manager also saw Velsko’s post. ‘I did see the photos, yes,’ Lumsden said. ‘And that was alarming to me. It was disheartening to say the least.’ But Lumsden says the images were taken out of context. ‘The frustrating thing is when you see a 30-second video like that and you don’t know the background,’ Lumsden said. ‘When that video shows a full tote, a thousand pounds of fish being dumped into a truck [it] gives a false representation like there is just tote after tote after tote after tote and that is simply not the case.’” [Alaskapublic.org, [06/06/18](#)]

NPFMC Took No Action To Limit Salmon Bycatch At Its October 2021 Meeting Despite Desperate Need From Alaska Native Villages

Alaska Native Leaders Wrote That The NPFMC’s “Failure To Eliminate The Pollock Trawl Fleet’s Salmon Bycatch Considerably In 2022 Disappoints Us As It Proves Industrial Fishing Is Favored Over Our Subsistence Ways Of Life.” “While the Council committed to some longer-term action, they did not heed our call to recognize that subsistence fishing families in western Alaska deserve to harvest the fish we have

Commented [SC26]: No illegal or unusual activity occurred. Like any processor, we receive bycatch from our independent harvesters when they deliver. We work with SeaShare, a non-profit organization, to donate much of this bycatch to needy families.

Regardless, all bycatch is managed intensively by the National Marine Fisheries Service and accounted for in setting annual catch limits.

Commented [SM27]: Trident serves more than 1,000 independent fishing vessels involved in all major fisheries and gear types. Trident has processing operations in 10 Alaska communities. Trident leadership, their captains and crew, and processing operation management teams care deeply about doing their part to support healthy fisheries and communities that rely on them. Fishery management objectives in the Gulf of Alaska include minimizing barriers to entry; which has led to less costly and less sophisticated bycatch management in that region relative to the Bering Sea. It is disheartening when the result is an occasional high bycatch fishing trip.

Commented [AE28]: The NPFMC is required by the MSA to balance all of the National Standards and use the best available scientific information to make those decisions.

been catching, cutting, and sharing for at least 12,000 years. Their failure to eliminate the pollock trawl fleet's salmon bycatch considerably in 2022 disappoints us as it proves industrial fishing is favored over our subsistence ways of life." [Anchorage Daily News, [10/30/21](#)]

Fisheries Managers Are Perceived As Being Too Cozy With The Trawler Industry

Non-Trawler Fishermen Are Suspicious Of What They See As A Cozy Relationship Between Fisheries Managers And The Trawl Industry As Numerous State And Federal Fisheries Professionals Are Recruited To Jobs In The Industry. "At meetings of the North Pacific Fishery Management Council, which sets the bycatch limits, longliners with decades on the water but no formal training find themselves up against highly educated, well-prepared trawl industry representatives. 'Half of them haven't even been on a boat,' Velsko says. Fishermen are likewise suspicious of what they see as a cozy relationship between fisheries managers and the trawl industry as numerous state and federal fisheries professionals are recruited to jobs in the industry." [National Geographic, [04/08/21](#)]

The Top Fisheries Administrator In The Trump Administration Now Works For Pollock Trawler Corporation American Seafoods. "A former top administrator for the National Oceanic and Atmospheric Administration (NOAA), Chris Oliver has been added to the American Seafoods regulatory division as Special Advisor on Government Affairs." [American Seafoods, [06/07/21](#)]

Earlier This Month (November 2021) The NPFMC Struck Language To Add More Tribal Representation To The Council.

The NPFMC Mentioned The Equity Concern Over Bycatch With Allowing The Pollock Fleet To Continue Fishing. "Rationale in Opposition to Amendment 1: There is an equity concern when in-river salmon users are unable to successfully harvest while the BSAI pollock fleet is able to continue its fishing practices." [Meetings.npfmc.org, Accessed [11/03/21](#)]

- **The NPFMC Advisory Panel Eliminated The Language From The Proposal To "Add 2 Voting Tribal Seats, Appointed By The Tribes, To The NPFMC Table."** "4) Ensure Alaska Native Tribes have a seat at the decision-making table a. 3. ~~Support adding 2 voting Tribal seats, appointed by the Tribes, to the NPFMC table.~~ b. Ensure Alaska Native Tribal representation on all Council bodies, including the AP, SSC and plan teams... *Amendment 3 passed 15-3.*" [Meetings.npfmc.org, Accessed [11/03/21](#)]

Alaska Native Leaders Have Criticized NPFMC For Inadequate Tribal Representation.

Alaska Native Leaders Say They Have "No Vote" In NPFMC's Processes And That Council Inaction Makes It Clear They Need Voting Seats. "Furthermore, the State of Alaska has a majority on the Council, and the ability to make decisions that are in the

Commented [MOU29]: The Council process is open and transparent, and all sectors are represented on the Council / Council committees. APA and other organizations engage in the Council process in good faith and provide testimony based on mechanisms available to all stakeholders.

Commented [MOU30]: See comment above relating to Council lobbying prohibitions.

best interest of the state and our people. The decisions of the state through the Council directly impact our lives as fishermen, yet our 229 federally recognized tribes have no vote in its processes. The Council's (in)actions make it abundantly clear that change is needed to the laws governing our federal fisheries, especially the Magnuson-Stevens Act. Rep. Huffman (D-CA) has introduced a bill to reauthorize the MSA which includes two voting tribal seats and strengthens the requirement to reduce bycatch. The time is long overdue for tribes to have seats at the decision-making table, as they do in the parallel Council in the Pacific Northwest." [Anchorage Daily News, [10/30/21](#)]

NPFMC Went So Far As To Write A Letter Opposing New Legislation That Would Address The Problem Of Trawler Bycatch

NPFMC Submitted A Response To Jared Huffman's "Sustaining America's Fisheries For The Future Act Of 2021," Where They Expressed Concern Over The Gravity Of The Bycatch Language Of The Text. "Inclusion of the phrase 'to the extent practicable' provides some threshold for achieving bycatch minimization, which is necessarily to be balanced with other national standards. By eliminating (Congressmen Huffman and Case September 30, 2021 Page 12 12) the practicability clause, the proposed bill creates a major policy change for just one fishery management component (bycatch), which could create uncertainty for the Council when considering and balancing the existing national standards" [Meetings.npfmc.org, [09/30/21](#)]

Page 1: [1] Commented [SC4]**11/20/21 9:24:00 AM**

The North Pacific Fishery Management Council (NPFMC) manages all stocks within its jurisdiction using science-based catch limits. Any amount of bycatch taken in the pollock sector is accounted for in the annual catch limit setting process (just as it is for all other non-trawl, non-pollock fisheries and their respective bycatch). If bycatch causes a conservation impact on other stocks, it would be recognized in stock and ecosystem assessment reports. To date, bycatch has not been recognized as a negative driver on stock or ecosystem health. Potential impacts are actively managed.

Page 1: [2] Commented [SM6]**11/21/21 2:13:00 PM**

Groundfish trawl fisheries primarily fall under federal jurisdiction in Alaska. Trawl stakeholders participate in the NPFMC's public process, along with all other sectors and community and conservation interests. Fishery management plans reflect a balance of competing objectives driven by National Standards.

Page 1: [3] Commented [SC8]**11/20/21 9:31:00 AM**

The proposals presented during a review of genetic composition of salmon bycatch were to reduce Chinook bycatch to zero in the pollock fishery. Like any fishery, the pollock fishery cannot exist without some level of bycatch, and thus the proposals would have shut down the pollock fishery. Even if the Council were to take up these proposals, it would have to go through its public, analytical process.

Page 1: [4] Commented [SC9]**11/20/21 9:31:00 AM**

The NPFMC's NOAA General Counsel representative explicitly noted on the record that the Councils are precluded from engaging in lobbying activity. This rationale was noted for not being able to support legislation that would add two Tribal seats to the Council. Given that H.R. 4690 would further strengthen MSA provisions that limit Councils' ability to lobby, it is confusing to see criticism here of the NPFMC's decision to conform to their legal advice on this matter..

Page 1: [5] Commented [MOU11]**11/23/21 11:29:00 AM**

All catcher processor vessels harvest CDQ quota; and Northern Hawk harvests some non-CDQ quota. The choices made about the presentation of the data here show a fundamental misunderstanding about the scope and operation of the vital CDQ program within the Alaska pollock fishery.