



June 13, 2023

Mr. Marc Gorelnik, Chair  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220

Re: Agenda J.5. Swordfish Workshop Scoping

Dear Chair Gorelnik and Council Members:

Wild Oceans and Oceana support the goal of a vibrant West Coast swordfish fishery that minimizes and avoids bycatch. To that end, the Council endorsed the idea of hosting a focused discussion on the future of the Pacific swordfish fishery. Since then, we have seen profound changes in the fishery including authorization of a limited entry permit program for deep-set buoy gear and federal legislation that sunsets the federal drift-gillnet permits within five years. These changes are laying a course away from indiscriminate, high-bycatch swordfish gear and towards more selective and sustainable gear. They are also achieving the goals of the Swordfish Management and Monitoring Plan, to reduce protected species bycatch and unmarketable or prohibited finfish catch through gear innovation.

The Highly Migratory Species Management Team (HMSMT) has provided you with a potential outline for a Swordfish Management and Monitoring Plan Workshop. Considering the changing landscape of the swordfish fishery, we suggest the Council focus on developing guidance for testing sustainable swordfish gear through Exempted Fishing Permits. As a next step, we ask the Council to focus on HMSMT recommendation 3(e), “develop criteria that may encourage and support future EFPs for new gears to target and harvest swordfish,” and specifically basing the design and performance criteria on the deep-set buoy gear configurations.

Buoy gear stands out for its high swordfish catch rates, low bycatch of non-target species and endangered sea turtles, live release of incidentally caught or undersized fish, and cost-effective monitoring and enforcement. The gear was developed using data from satellite tags to determine optimal times and depths to target swordfish while avoiding

other sensitive species. A decade of testing with thousands of sets fished off California has yielded 98% marketable catch. Rapid deployment and retrieval combined with fishing at depths below the thermocline has enabled highly selective targeting. Because DSBG is actively tended, the risk of post-release mortality of bycatch is significantly reduced.

However, buoy gear has been used primarily at a smaller scale. In addition to scaling up the use of currently authorized configurations, the next logical step to increase domestic Pacific swordfish landings is testing of gear that incorporates the key components of buoy gear, but enables higher volume and better suited to larger boats or offshore or northern waters. To this end, we suggest you schedule a meeting of the HMSMT and HMS Advisory Subpanel along with public input focused on the following:

**1. Guidance for Exempted Fishing Permits.** Discuss what additional guidance the Council can give applicants who want to test gear building upon the successful buoy gear configuration. For example, 1) what scientific questions are being asked and do we want answered, 2) what type of gear modifications are we seeking (e.g., additional hooks, linked buoy gear), 3) what qualifications should applicants demonstrate, 4) should new EFPs overlap geographically with DSBG, and 5) what additional measures should be taken to reduce and track gear loss.

**2. Performance Criteria for EFPs.** Develop draft performance criteria for EFP catch composition based on the current performance of deep-set buoy gear. To begin with, your advisors should compile data on buoy gear, including target species catch rates, catch rates of non-marketable species, bycatch avoidance, and pre- and post-release survivorship of non-target species. From this baseline, recommend any additional criteria to judge future EFP performance. With such criteria, agreed upon in advance, applicants can explain how their EFP is designed to achieve the performance criteria and managers and stakeholders can objectively evaluate EFP results. In turn, the public can have confidence in management decisions based on EFP research.

By incorporating this workshop into a joint meeting of the HMSMT and HMSAS that allows public participation and input, the Council maintains the transparent public process that is the cornerstone of fisheries management. By focusing this workshop on buoy gear innovation with broad support and narrow scope and which can help achieve the goals of Swordfish Management and Monitoring Plan (SMMP), the Council can plan to provide timely guidance to EFP applicants for near term EFP submissions. By narrowing the topic to gear innovation based on the buoy gear platform, you are providing fishermen with a clear roadmap to sustainable gear.

Sincerely,



Theresa Labriola, Wild Oceans



Ben Enticknap, Oceana