

RE: Standardized Bycatch Reporting Methodology- Scoping

June 2021 PFMC Meeting C.2: Standardized Bycatch Reporting Methods-Scoping Public Comment We've reviewed the SBRM Scoping Report prepared for agenda item C.2. We are providing the following comments for the Council and NMFS's to evaluate salmon bycatch reporting methodologies in the groundfish sector. We are concerned there is a lack of consistency among trawl sectors (e.g. At-Sea Whiting, Shore Based Whiting, Bottom Trawl, Mid-water Rockfish) when reporting salmon bycatch. State fish and wildlife salmon fisheries programs receiving few, if any, salmon bycatch samples from the trawl industry. These samples are critical to determine the impact on ESA and threatened salmon listings. Trawl's salmon bycatch impacts all salmon stocks; threatened or not. Impact on Directed Salmon Sector: Ocean salmon fisheries from Mexico to Canada have and will continue to experience significant restriction in the foreseeable future. Commercial and recreational ocean salmon fisheries are experiencing dwindling interest and failing infrastructure. Recruitment of new full time commercial operators is not sustainable; projecting a collapse of the commercial salmon fleet as we know it and demonstrated by the declining value of vessels and permits. Recreational interest wanes to where shore based infrastructure is failing and/or pivots to other more reliable sources of income. We feel all sectors which impact salmon stocks must have responsibility in promoting salmon success and be part of the solution to return stocks to MSY abundance; and not just the directed fisheries. We recognize some sectors of the trawl industry have made significant investment and effort to avoid salmon bycatch. However, we do not see that effort made by all sectors or all participants in a given trawl sector. These inconsistencies in the trawl sector put the directed ocean salmon fishery at risk for survival. Scoping Request: We respectfully request the Council direct the GMT to review consistency in regulation and reporting of salmon bycatch by the trawl sectors. Some of the elements we wish to incorporate as consistent between trawl sectors in the reporting protocol are: • All salmon bycatch are retained and surrendered to state fish and wildlife officials upon landing of ground fish • For purposes of biological sampling, all salmon bycatch is kept refrigerated while onboard the intercepting vessel • Landing brokers/buyers are held responsible for the transfer of salmon bycatch to state fish and wildlife personnel. Brokers must notify fish & wildlife within 24 hours of groundfish landings with salmon bycatch. And, brokers must hold and maintain salmon bycatch in refrigerated storage until retrieved by State F&W officials. Since current regulations are not being met, we submit that penalties are increased to motivate complete adherence to regulations assuring F&G departments receive salmon bycatch in good condition for laboratory testing.