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Angel Drobnica, Chair
North Pacific Fishery Management Council
1007 W. Third Ave, Suite 400
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Re: C6 Pelagic Trawl Gear Definition

Dear Chair Drobnica and Council members:

Ocean Conservancy¹ submits the following comments on C6 Pelagic Trawl Gear Definition Initial Review. **We recommend the Council develop a pelagic trawl gear definition and enforcement measures that reduce bycatch and protect important benthic habitat by ensuring that pelagic trawl gear is not contacting the seafloor.**

The current definition of “pelagic” trawling allows for high bottom contact rates by pelagic trawls in the BSAI and GOA, including in important habitat areas which are closed to bottom trawling. The 2022 Evaluation of Fishing Effects on Essential Fish Habitat (EFH) Discussion Paper for pelagic pollock in the Bering Sea and Aleutian Islands (BSAI) reported bottom contact estimates of 20-60% for catcher vessels (CV) and 70-100% for catcher processors (CP).² In the Gulf of Alaska (GOA), where a 10% bottom contact limit is in place, bottom contact estimates for CVs were up to 40%.²

Bottom trawling has significant negative impacts to the seafloor and benthic ecosystem function by reducing the density of organisms that cycle nutrients³, reducing the density of faunal biomass with each pass⁴, impacting biogeochemical cycles⁵, impairing nutrient fluxes³, and damaging biogenic bottom structure necessary for demersal fish throughout various life stages.⁶

The Council must develop a definition of pelagic trawling which clearly identifies the goals and objectives for gear performance, protects the seafloor and is paired with an enforceable performance standard. The next

¹ Ocean Conservancy is a non-profit organization working to protect the ocean from today’s greatest global challenges. We envision a healthier ocean, protected by a more just world and, together with our partners, we create evidence-based solutions for a healthy ocean and the wildlife and communities that depend on it.

² Zeleski et al. 2022. [2022 Evaluation of Fishing Effects on Essential Fish Habitat](#). NOAA.

³ Olsgard, F., Schaanning, M.T., Widdicombe, S., Kendall, M.A. and Austen, M.C., 2008. Effects of bottom trawling on ecosystem functioning. *Journal of Experimental Marine Biology and Ecology*, 366(1-2), pp.123-133.

⁴ Hiddink, J.G., Jennings, S., Sciberras, M., Szostek, C.L., Hughes, K.M., Ellis, N., Rijnsdorp, A.D., McConnaughey, R.A., Mazor, T., Hilborn, R. and Collie, J.S., 2017. Global analysis of depletion and recovery of seabed biota after bottom trawling disturbance. *Proceedings of the National Academy of Sciences*, 114(31), pp.8301-8306.

⁵ Pusceddu, A., Bianchelli, S., Martín, J., Puig, P., Palanques, A., Masqué, P. and Danovaro, R., 2014. Chronic and intensive bottom trawling impairs deep-sea biodiversity and ecosystem functioning. *Proceedings of the National Academy of Sciences*, 111(24), pp.8861-8866.

⁶ Pauly, D., Christensen, V., Guénette, S., Pitcher, T.J., Sumaila, U.R., Walters, C.J., Watson, R., Zeller, D., 2002. Towards sustainability in world fisheries. *Nature* 418, 689–695.

iteration of the Initial Review must clarify pelagic trawl gear's intended performance and expand upon the original document with a focus on protecting vulnerable habitat and species. Until an intended performance is identified, the proposed updates to the gear definition will have limited efficacy with regards to ecosystem-based management in the region.

We do support the need for gear innovation to allow for advancements in gear design that reduce habitat impacts and mortality of vulnerable species such as Pacific halibut, salmon and crab. Gear innovation can reduce habitat impacts associated with pelagic trawls; however, gear innovation without enforceability or accountability (i.e. a viable gear definition and performance standard) is a recipe for unregulated and undocumented habitat damage.

Gear innovation has led to the development and use of bottom contact sensors in other regions.⁷ And bottom contact sensors or cameras should be required to enforce bottom trawl closures. The Office of Law Enforcement (OLE) confirms this technology is currently available: the BBRKC June 2023 analyses states, "*OLE has become aware of the potential to improve enforcement of existing and potential future gear restrictions involving seafloor contact. In recent months, OLE has determined currently fielded transducer and sensor technologies enable monitoring of seafloor contact. If the Council were to mandate the use of existing technologies to record – and allow enforcement access to – seafloor contact data, the potential for successful enforcement of seafloor-contact gear restriction(s) is high.*"

Utilizing this available technology, the Council should prohibit pelagic trawls from contacting the seafloor. Until there is an identified intended performance for trawl gear and an associated enforceable performance standard, pelagic trawl fishing should not be allowed in areas closed to bottom trawling. Trawl vessels should be required to demonstrate they are not fishing on the bottom in areas closed to bottom trawling, such as the Red King Crab Savings Area.

In summary, the Council must prioritize a definition of pelagic trawl which ensures that pelagic trawls are not operating on the seafloor in areas closed to bottom trawling. Thank you for your consideration of our comments, and we look forward to working with you on this critical issue.

Sincerely,



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⁷ [Seafood New Zealand, "Visible footprints on the seafloor," June 2023.](#)