Groundfish Management Policy Review Report[1]

May 1, 2026

Note, this version has been revised from the original document posted on May 1, 2026. This version contains revisions in Sections 3.1 and 3.2.

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1. Introduction - Review of Council actions 2022-2025

The Council is undertaking a periodic review of the Groundfish Management Policy contained within the Fishery Management Plans for Groundfish of the Bering Sea and Aleutian Islands Management Area (BSAI) and Gulf of Alaska (GOA) (Groundfish FMPs). The full Management Policy, which consists of a Management Approach statement, 9 goals, and 45 objectives, is provided as Appendix 1. The Council developed and adopted the current Management Policy based on the analysis in the 2004 Programmatic Supplemental Environmental Impact Statement for the Alaska Groundfish Fisheries Implemented Under the Authority of the Fishery Management Plans for the Groundfish Fishery of the Gulf of Alaska and the Groundfish of the Bering Sea and Aleutian Islands Area (hereafter, PSEIS)[2]. As part of the Groundfish Management Policy, the Council also committed to regularly reviewing the Management Policy as a means of adaptive management.

Groundfish Management Policy Reviews provide the Council with a periodic opportunity to review the Groundfish Management Policy and Council activities in support of the Policy, consider whether any modifications are warranted, and consider whether the Council should undertake additional activities to

[1] Prepared by Katie Latanich, Council staff, with contributions from Council and NMFS staff
[2] Available from: https://repository.library.noaa.gov/view/noaa/19481

fulfill the Policy. Reviews are conducted approximately every 3 years.[3] Past reviews have not resulted in any changes to the Management Policy.

This review document supports the Council's Review for the period 2022-2025, and also provides a longer term perspective on the history of groundfish management. For this review cycle the Council directed Council staff to take a more cumulative approach given that over 20 years have passed since the Management Policy was adopted. This document also aims to more fully capture the Council's work on climate resilience planning and incorporation of Local Knowledge, Traditional Knowledge, and subsistence information (LKTKS). Both topics were, and continue to be, Council priorities during the review period and a focus of the Council's climate resilience planning through funding provided under the Inflation Reduction Act (IRA). Additionally, this review document can help the Council and public consider the role of the Management Policy in the context of other Council policy guidance adopted since 2004, particularly the Ecosystem Policy and the Bering Sea Fishery Ecosystem Plan (BSFEP) Goals and Objectives (both provided in Appendix 1).

The Groundfish Management Policy Review is a process requirement that does not require any changes to be made. **The Council's work during the review period continues to generally align with and support the Management Policy as written, and staff did not identify any strong concerns or mismatches between the Management Policy and current Council practices.** However, this document does identify opportunities for further Council discussion, including where the interpretation or implementation of a goal and/or objective may have evolved since it was written.

There are multiple paths forward the Council could consider in response to this review document, including no further action. The Council could also consider whether, based on the review, it is useful to revise or update elements of the Management Policy for purposes of communicating about the Council's values and priorities, providing guidance to staff, and providing transparency regarding how the Council considers information and tradeoffs in its management recommendations. The Council could undertake changes through updates, revisions, or other changes to the goals, objectives, and/or Management Approach within the Groundfish Management Policy. Any changes to the existing Groundfish Management Policy would require an FMP amendment. The Council could also consider other actions in response to this review, for example informal Council policy statements that live outside the FMP or a workplan prioritizing additional actions the Council wishes to undertake under the FMP policy. Additional examples of potential next steps are outlined in Section 4.

Section 2 of this document includes a summary table of Council activities during the review period, and Section 3 summarizes emergent themes from the review of goals and objectives. Section 4 summarizes next steps and considerations for the Council. Section 5 provides a detailed discussion of the Council's work relative to individual goals and objectives, and additional context for the wording of goals and objectives.

[3] Reviews were conducted annually until February 2018, at which point the Council switched to a 3-year review cycle to align with the timespan of Council actions. The most recent review was completed in 2022 for the period 2019-2021: D3 Groundfish Management Policy Review, February 2022.

2. Summary of Council actions and activities during the review period

Table 1: Summary of Council actions and activities 2022-2025, with examples of earlier Council actions 2004-2021.
Management objectives combined in the first column of this table are typically tracked together in the Groundfish Workplan Updates provided under E items at every Council meeting.

Goal 1: Prevent Overfishing		
Management objectives	**Council actions and activities during the review period (2022-2025)**	**Examples of earlier actions 2004-2021**
1. Adopt conservative harvest levels for multi-species and single species fisheries and specify optimum yield. 2. Continue to use the optimum yield cap for the BSAI and GOA groundfish fisheries. 3. Provide for adaptive management by continuing to specify optimum yield as a range.	● Annual proposed and final groundfish harvest specifications for 2023-2027 ● Consideration of Harvest Control Rule (HCR) adjustments for climate resilience (also see Climate Resilience section) ● Best Scientific Information Available (BSIA) review ● Groundfish stock prioritization review ● Clarification of subarea apportionment procedures ● Consideration of modifying accountability measures by adding inseason management authority ● Separation of GOA Demersal Shelf Rockfish stock complex from Other rockfishes stock complex	● Establishment of current tier system, harvest policies, and harvest specifications process ● Establishment of OY as a range in BSAI and GOA ● Amendments to bring FMPs in line with 2006 MSA annual catch limit requirements ● Actively manage using appropriate species categories ● Ongoing improvement of stock assessment processes through CIE reviews ● Council policy and ongoing discussion of spatial management of stocks
4. Provide for periodic reviews of the adequacy of F40 and adopt improvements, as appropriate.	● NMFS Center for Independent Expert (CIE) peer reviews (multiple)	
5. Continue to improve the management of species through species categories.	● Ongoing use of species categories (target species and ecosystem component species categories); no changes during review period	

Goal 2: Promote Sustainable Fisheries and Communities		
Management objectives	**Council actions and activities during the review period (2022-2025)**	**Examples of earlier actions 2004-2021**
6. Promote conservation while providing for optimum yield in terms of the greatest overall benefit to the nation with particular reference to food production, and sustainable opportunities for recreational, subsistence, and commercial fishing participants and fishing communities.	• These considerations are applied in all Council management recommendations • See specific actions, also under Priorities 1, 7, and 8	• These considerations are applied in all Council management recommendations
7. Promote management measures that, while meeting conservation objectives, are also designed to avoid significant disruption of existing social and economic structures.		
8. Promote fair and equitable allocation of identified available resources in a manner such that no particular sector, group or entity acquires an excessive share of the privileges.		
9. Promote increased safety at sea.	• This consideration is applied in all Council management recommendations • USCG reports • National Institute for Occupational Safety and Health (NIOSH) report	• This consideration is applied in all Council management recommendations

Goal 3: Preserve Food Web		
Management objectives	**Council actions and activities during the review period (2022-2025)**	**Examples of earlier actions 2004-2021**
10. Develop indices of ecosystem health as targets for management.	● Ecosystem Status Reports (ESRs) for eastern Bering Sea, Aleutian Islands, and Gulf of Alaska ● Development of Ecosystem and Socioeconomic Profiles (ESPs) for some stocks	● Development of ESR, ESPs, and risk tables and use in harvest specifications process; ABC<ABCmax as needed ● Development of BS FEP and completion of 2 Action Modules ● Measures to prevent development of targeted fisheries for forage species; measures to restrict incidental
11. Improve the procedure to adjust acceptable biological catch levels as necessary to account for uncertainty and ecosystem factors.	● As needed to account for scientific uncertainty, adopt ABC<maxABC ● Risk tables used in groundfish Stock Assessment and Fishery Evaluation (SAFE) reports to document uncertainty and provide framework for adjusting ABC	
12. Continue to protect the integrity of the food web through limits on harvest of forage species.	● Forage species report included biennially with groundfish SAFE reports	
13. Incorporate ecosystem-based considerations into fishery management decisions, as appropriate.	● ESR presentations as part of annual specifications process ● ESR in-briefs ● Completion of BS FEP Climate Adaptation and Local Knowledge, Traditional Knowledge, and Subsistence (LKTKS) Action Modules	

Goal 4: Manage Incidental Catch and Reduce Bycatch and Waste		
Management objectives	**Council actions and activities during the review period (2022-2025)**	**Examples of earlier actions 2004-2021**
14. Continue and improve current incidental catch and bycatch management program.	• Continuous improvement supported by other actions related to Objectives 15-21	• Improved accounting of mortality, improvements in utilization and retention • Refinement of tools for bycatch and particularly Prohibited Species Catch (PSC) management and avoidance; linking PSC management with abundance (halibut, Chinook and chum salmon) • Restructuring of North Pacific Observer Program; improvements to catch accounting and monitoring; implementation of electronic monitoring • Increasing use of incentive-based programs, development of cooperatives, pairing of regulatory and industry-based bycatch monitoring and avoidance strategies • Enhanced information on salmon abundance and genetic origins • Industry-led gear innovations and modifications
15. Develop incentive programs for bycatch reduction including the development of mechanisms to facilitate the formation of bycatch pools, vessel bycatch allowances, or other bycatch incentive systems.	• Ongoing: Cooperative structures and Incentive Plan Agreements (IPAs; BS pollock) support incentive-based approaches • BS Chum salmon bycatch action recommendations include adjustments to IPAs	
16. Encourage research programs to evaluate current population estimates for non-target species with a view to setting appropriate bycatch limits, as information becomes available.	• Ongoing: Use of information from NMFS AFSC, ADFG, and other research programs that contribute to current population estimates for non-target species, including those managed as PSC	
17. Continue program to reduce discards by developing management measures that encourage the use of gear and fishing techniques that reduce bycatch which includes economic discards.	• Actions to address unobserved crab mortality (incl. consideration of Bristol Bay Red King Crab closures, Crab Conservation Plan, Unobserved Mortality Working Group, industry bycatch avoidance reports, pelagic trawl gear innovations)	
18. Continue to manage incidental catch and bycatch through seasonal distribution of total allowable catch and geographical gear restrictions.	• Ongoing: Various area closures, seasons, and gear restrictions in regulation, annual harvest specifications	
19. Continue to account for bycatch mortality in total allowable catch accounting and improve the accuracy of mortality assessments for target, prohibited species catch, and non-commercial species.	• Monitoring of the vessels in the full coverage and partial coverage categories provides a comprehensive data collection program from which to extrapolate and provide accurate estimates of bycatch mortality discards	
20. Control the bycatch of prohibited species through prohibited species catch limits or other appropriate measures.	• BS Chum salmon bycatch management in the directed pollock fisheries (final action 2026)	
21. Reduce waste to biologically and socially acceptable levels.	• BS Chum salmon bycatch management in the directed pollock fisheries (final action 2026) • Authorization of pot gear for targeting BSAI Greenland turbot • Small sablefish release	

Goal 5: Avoid Impacts to Seabirds and Marine Mammals		
Management objectives	**Council actions and activities during the review period (2022-2025)**	**Examples of earlier actions 2004-2021**
22. Continue to cooperate with the U.S. Fish and Wildlife Service (USFWS) to protect ESA-listed species, and if appropriate and practicable, other seabird species.	● Seabird informational updates ● Cooperation and protective measures (ongoing)	● Ongoing cooperation and information updates ● Protective measures in regulation including for Steller sea lions and walrus ● Ongoing Endangered Species Act (ESA) consultations and reviews, and updates to Biological Opinions
23. Maintain or adjust current protection measures as appropriate to avoid jeopardy of extinction or adverse modification of critical habitat for ESA-listed Steller sea lions.	● Steller sea lion protection measures in regulation (ongoing)	
24. Encourage programs to review status of endangered or threatened marine mammal stocks and fishing interactions and develop fishery management measures as appropriate.	● Protected species reports ● Northern fur seal conservation plan updates	
25. Continue to cooperate with NMFS and USFWS to protect ESA-listed marine mammal species, and if appropriate and practicable, other marine mammal species.	● Cooperative and protective measures (ongoing) ● NMFS reinitiation of Biological Opinion for Bering Sea groundfish fisheries (in progress) ● NMFS completion of Biological Opinion for GOA groundfish fisheries ● Authorization of longline pots for Greenland turbot	

Goal 6: Reduce and Avoid Impacts to Habitat		
Management objectives	**Council actions and activities during the review period (2022-2025)**	**Examples of earlier actions 2004-2021**
26. Review and evaluate efficacy of existing habitat protection measures for managed species.	• Completion of 2023 Essential Fish Habitat (EFH) 5-Year review, including updates to Fishing Effects model • Council Coordination Committee (CCC) Area-Based Management Subcommittee final report and effectiveness checklist	• EFH 5-Year reviews and updates to FMP elements including identification and description of EFH • Development of Habitat Areas of Particular Concern (HAPC) process and identification of HAPCs • Development of, and updates to Fishing Effects model for assessing adverse fishing impacts • Mitigation measures including area-based closures in BSAI (“freezing footprint), AI, and GOA area-based protections • Trawl sweep elevation requirements
27. Identify and designate essential fish habitat and habitat areas of particular concern pursuant to Magnuson-Stevens Act rules, and mitigate fishery impacts as necessary and practicable to continue the sustainability of managed species.	• EFH identification and descriptions; completion of 2023 EFH 5-Year Review and Groundfish FMP amendments; planning for 2028 review • Mitigation measures, including area closures and gear restrictions (ongoing) • Council's EFH consultation policy (ongoing) and annual NMFS reports • Pelagic trawl gear definition	
28. Develop a Marine Protected Area policy in coordination with national and state policies.	• CCC Area-Based Management Subcommittee final report	
29. Encourage development of a research program to identify regional baseline habitat information and mapping, subject to funding and staff availability.	• NMFS EFH Research Plan • Council research priorities	
30. Develop goals, objectives and criteria to evaluate the efficacy and suitable design of marine protected areas and no-take marine reserves as tools to maintain abundance, diversity, and productivity. Implement marine protected areas if and where appropriate.	• Area closures in place (ongoing)	

Goal 7: Promote Equitable and Efficient Use of Fishery Resources		
Management objectives	**Council actions and activities during the review period (2022-2025)**	**Examples of earlier actions 2004-2021**
31. Provide economic and community stability to harvesting and processing sectors through fair allocation of fishery resources.	● BSAI Pacific cod small boat access ● Allocation reviews	● Address excess fishing capacity and overcapitalization ● Implementation and consideration of new LAPP programs; refinements to existing programs, e.g. consideration of entry and access challenges ● Ongoing evaluation through program and allocation reviews
32. Maintain the license limitation program, modified as necessary, and further decrease excess fishing capacity and overcapitalization by eliminating latent licenses and extending programs such as community or rights-based management to some or all groundfish fisheries.	● BSAI pot cod Limited Access Privilege Program (LAPP) (considered but no further action)	
33. Provide for adaptive management by periodically evaluating the effectiveness of rationalization programs and the allocation of access rights based on performance.	● Combined program/allocation reviews (AFA pollock, Central GOA Rockfish, Halibut and Sablefish IFQ, Amendment 80 and allocation reviews (BSA Yellowfin Sole, Atka Mackerel, and Pacific Ocean Perch; GOA Pacific cod sector allocations ● CDQ review (State of AK) ● IFQ and coop reports	
34. Develop management measures that, when practicable, consider the efficient use of fishery resources taking into account the interest of harvesters, processors, and communities.	● Small sablefish retention ● Central GOA Rockfish Program adjustments ● Consideration of clarity, consistency, and efficiency in cost recovery administration ● Executive Order deregulatory measures ● Maximum Retainable Amount (MRA) adjustments ● Greenland turbot in longline pots action	

Goal 8: Increase Alaska Native Consultation		
Management objectives	**Council actions and activities during the review period (2022-2025)**	**Examples of earlier actions 2004-2021**
35. Continue to incorporate local and traditional knowledge in fishery management.	● Adoption of LKTKS Protocol and Policy Statement; work on onramp recommendations ● Integration of LKTKS information into chum salmon bycatch action analysis	● Clarification of formal consultation procedures and NMFS and Council roles ● Improvements to meeting accessibility ● Issue-specific outreach and engagement, primarily salmon bycatch management
36. Consider ways to enhance collection of local and traditional knowledge from communities, and incorporate such knowledge in fishery management where appropriate.		
37. Increase Alaska Native participation and consultation in fishery management.	● Council and NMFS coordination ● Meeting accessibility practices, changes to public comment procedures ● Dedicated Tribal representation on AP ● Chum salmon bycatch action Tribal engagement	

Goal 9: Improve Data Quality, Monitoring and Enforcement		
Management objectives	**Council actions and activities during the review period (2022-2025)**	**Examples of earlier actions 2004-2021**
38. Increase the utility of groundfish fishery observer data for the conservation and management of living marine resources.	• Observer Annual Deployment Plans and Annual Observer Reports • Consideration of cost efficiencies in the partial coverage observer program • Advisory bodies (ongoing) • Removal of Economic Data Reporting requirements • Crew data and universal data collection components (no further action) • Trawl Electronic Monitoring implementation	• Restructuring of the North Pacific Observer Program to achieve equitable costs and improve coverage, adjustments to coverage categories and fees, ongoing adjustments including review of Annual Deployment Plans • Ongoing improvements to catch accounting and monitoring data including integration of new technology • Encouraging research through Council research priorities • Long term cooperation and coordination with agencies and entities
39. Develop funding mechanisms that achieve equitable costs to the industry for implementation of the North Pacific Groundfish Observer Program.		
40. Improve community and regional economic impact costs and benefits through increased data reporting requirements.		
41. Increase the quality of monitoring and enforcement data through improved technology.		
42. Encourage a coordinated, long-term ecosystem monitoring program to collect baseline information and compile existing information from a variety of ongoing research initiatives, subject to funding and staff availability.	• Research priorities • Informational updates, letters of support	
43. Cooperate with research institutions such as the North Pacific Research Board in identifying research needs to address pressing fishery issues.		
44. Promote enhanced enforceability.	• Enforcement precepts, Enforcement Committee	
45. Continue to cooperate and coordinate management and enforcement programs with the Alaska Board of Fish, Alaska Department of Fish and Game, and Alaska Fish and Wildlife Protection, the U.S. Coast Guard, NMFS Enforcement, International Pacific Halibut Commission, Federal agencies, and other organizations to meet conservation requirements; promote economically healthy and sustainable fisheries and fishing communities; and maximize efficiencies in management and enforcement programs through continued consultation, coordination, and cooperation.	• Council meeting B reports, ongoing coordination with named and other international, national, and Alaska-based organizations	

Climate Resilience (additional category)	
The Council's climate resilience work spans multiple Groundfish FMP goals and objectives, and is summarized in this section.	● Completion of BS FEP Climate Action Module; Climate Change Task Force final report and recommendations ● Climate Scenarios Workshop and report ● Climate Resilience Workplan ● IRA funding opportunity and planning, including Scientific Coordination Subcommittee meeting discussions ● Consideration of climate-enhanced adjustments to harvest control rules ● Consideration of climate-ready management policies via Programmatic Evaluation (no further action) and Groundfish management Policy Review ● Reconstitution of Ecosystem Committee

3. Discussion and themes

This section summarizes emergent themes from the in-depth discussion of individual Groundfish Management Policy goals and objectives provided in Section 5. **The Council's work continues to generally align with and support the Management Policy as written**. **This section is not intended to suggest the Management Policy or specific goals or objectives are in need of revision.** It does provide examples to illustrate questions the Council could consider when determining whether it is useful to revise or update elements of the Management Policy for purposes of communicating about the Council's values and priorities, providing guidance to staff, and providing transparency regarding how the Council considers information and tradeoffs in its management recommendations. This section can also help the Council reflect on the attributes of FMP-level policy guidance including substance, length, level of detail, and durability over time. The examples provided are not comprehensive, and readers are encouraged to consult Section 5 for further discussion.

3.1 Relationships with other entities and legal requirements

Consistency with Federal law and policy
Many Groundfish FMP goals and objectives reflect Federal law and regulatory guidance, including the Magnuson-Stevens Act (MSA) National Standards, with which all Council management recommendations must be consistent. Table 2 1 shows the alignment between National Standards and Management Policy goals and objectives. Some, though not all of the National Standards have an associated Groundfish FMP goal or objective. The Management Approach also states the Council's requirement to comply with other Federal laws including the National Environmental Policy Act (NEPA) and the Endangered Species Act (ESA). Goal 5, Avoid Impacts to Seabirds and Marine Mammals, also references the ESA.

As part of this review the Council could consider whether the Management Policy should continue to restate the National Standards and the need for compliance with other Federal laws, and if so whether this should be stated in the Management Approach, embedded in individual goals and objectives, or both (as is current practice). The Management Policy in its current form restates the Council's commitment to fundamental MSA requirements including setting sustainable harvest limits, achieving optimum yield, and balancing social and economic considerations; this was the Council's intent for including these goals and objectives when it developed its Groundfish Management Policy.

Addressing consistency and compliance with Federal requirements does contribute to a long and detailed set of goals and objectives that restates requirements in addition to communicating Council-driven values and priorities. The goals and objectives of the other species-based FMPs are more streamlined and do not reference the National Standards as extensively.[4]

[4] See Appendix 2: Comparison of FMP goals and objectives by theme in the April 2025 Programmatic Evaluation Discussion Document

Table 2. Alignment between Groundfish FMP Management Approach, goals, objectives, and the MSA National Standards. Note, this table indicates where there is alignment between specific words, phrases, and concepts (bolded text) used in the National Standards, and the language of the Groundfish Management Policy. Fishery management recommendations must be consistent with the National Standards and the Management Approach also states that management measures will conform with the National Standards.

National Standard		**Management Approach**	**Goal and/or objectives**
1	Conservation and management measures shall prevent overfishing while achieving, on a continuing basis, the **optimum yield** from each fishery for the United States fishing industry.	Yes	Goal 1 and Obj. 1, 2, and 3; Obj. 6
2	Conservation and management measures shall be based upon the **best scientific information available**.	Yes	No
3	To the extent practicable, an individual stock of fish shall be **managed as a unit** throughout its range, and interrelated stocks of fish shall be managed as a unit or in close coordination.	No	No
4	Conservation and management measures shall not discriminate between residents of different States. If it becomes necessary to allocate or assign fishing privileges among various United States fishermen, such **allocation** shall be (A) **fair and equitable** to all such fishermen; (B) reasonably calculated to promote conservation; and (C) carried out in such manner that no particular individual, corporation, or other entity acquires an excessive share of such privileges.	No	Obj. 8, Obj. 31 and 33
5	Conservation and management measures shall, where practicable, consider **efficiency in the utilization of fishery resources**; except that no such measure shall have economic allocation as its sole purpose.	No	Goal 7 and Obj. 34
6	Conservation and management measures shall take into account and allow for **variations** among, and **contingencies** in, fisheries, fishery resources, and catches.	No	No
7	Conservation and management measures shall, where practicable, **minimize costs** and **avoid unnecessary duplication**.	No	Obj. 34; Obj. 39 and 40
8	Conservation and management measures shall, consistent with the conservation requirements of this Act (including the prevention of overfishing and rebuilding of overfished stocks), take into account the importance of fishery resources to **fishing communities** by utilizing economic and social data that meet the requirements of paragraph (2), in order to (A) provide for the **sustained participation** of such communities, and (B) to the extent practicable, **minimize adverse economic impacts** on such communities.	Yes	Goal 2 and Obj. 6; Goal 7 and Obj. 31 and 34
9	Conservation and management measures shall, to the extent practicable, (A) **minimize bycatch** and (B) to the extent bycatch cannot be avoided, **minimize the mortality of such bycatch**.	Yes	Goal 4 and Obj. 14-221
10	Conservation and management measures shall, to the extent practicable, promote the **safety of human life at sea**.	No	Obj. 9

Coordination with other agencies and entities

Several goals and objectives reference the Council's practice of coordinating with other Federal and state agencies and entities, by requirement as well as through voluntary collaborations. The Council could

consider whether these relationships should continue to be reinforced and formalized as objectives, or whether relationships, requirements, and practices are adequately captured in other ways such as through the Management Approach statement, FMP language, Council Statement of Organization, Practices, and Procedures (SOPPs), and legal requirements. Examples include the following:

- *Objective 43: Cooperate with research institutions such as the North Pacific Research Board in identifying research needs to address pressing fishery issues.*
- *Objective 45: Continue to cooperate and coordinate management and enforcement programs with the Alaska Board of Fish, Alaska Department of Fish and Game, and Alaska Fish and Wildlife Protection, the U.S. Coast Guard, NMFS Enforcement, International Pacific Halibut Commission, Federal agencies, and other organizations to meet conservation requirements; promote economically healthy and sustainable fisheries and fishing communities; and maximize efficiencies in management and enforcement programs through continued consultation, coordination, and cooperation.*

3.2 Durability of FMP guidance over time

Elements of the Groundfish Management Policy including the Management Approach, goals, and objectives reflect the time at which they were written in the early 2000s. The Council could consider whether the wording of the Management Policy has remained relevant and durable over time, and whether it may be appropriate to reorganize, revise, or update this language. Alternatively, the Council may conclude the Management Policy as written can be interpreted in the context of current practices and information, and does not warrant updating as a result.

Updating FMP goals and objectives to reflect current conditions and understanding of the groundfish fisheries and marine ecosystems does have a precedent with the 2004 PSEIS, which noted that the existing FMP goals and objectives adopted in earlier iterations of the Groundfish FMPs "reflect[ed] the issues and needs of the time, and do not necessarily represent today's perspective and our current understanding of the fisheries and the marine ecosystem." The GOA and BSAI Groundfish FMPs, first implemented in 1978 and 1981, respectively, contained management policy statements that incorporated the MSA National Standards and reflected the management issues and priorities of that period. Because the two Groundfish FMPs were prepared by different writers, their respective policy statements differ in wording. The BSAI FMP policy was not changed until the Council's adoption of the Groundfish Management Policy based on the 2004 PSEIS. The GOA FMP policy was updated in 1985, and no further revisions were made until the Council's adoption of the Groundfish Management Policy based on the 2004 PSEIS.[5]

Based on the discussion of individual Groundfish Management Policy goals and objectives in Section 5, there are several areas where updated language may be appropriate to consider. This is not presupposing that any changes are necessary, and the Council's work continues to support and align with goals and objectives as they are written. These examples highlight where minor updates could provide benefits such as additional clarity, bringing policy language more in line with current Council practices, and/or reflecting current understanding of the groundfish fisheries and marine ecosystems.

[5] PSEIS Section 2.3 provides a brief summary of policy guidance provided in the original BSAI and GOA FMPs

Example: References to intended management actions

Some objectives state the Council's intent to address issues identified at the time of the 2004 PSEIS, and specific tools or strategies the Council intended to consider. The Council could consider whether it views any of the Groundfish FMP objectives as mostly completed, or whether it views them as ongoing needs. For example, since 2004 the Council has taken substantial actions that address the objectives below, though in both examples the Council also continues to take other actions that align with each objective.

- *Objective 39: Develop funding mechanisms that achieve equitable costs to the industry for implementation of the North Pacific Groundfish Observer Program.*

  The Council directly addressed Objective 39 through the restructuring of the North Pacific Observer Program (BSAI Amendment 86/GOA Amendment 76, approved in 2012).[6] The Council also continued to support this objective through actions during the review period that include reviewing annual Observer Deployment Plans, supporting the piloting and implementation of electronic monitoring programs, and considering cost efficiency.

- *Objective 32: Maintain the license limitation program, modified as necessary, and further decrease excess fishing capacity and overcapitalization by eliminating latent licenses and extending programs such as community or rights-based management to some or all groundfish fisheries.*

  The Council directly addressed Objective 32 through the development of new LAPP programs, including BSAI Amendment 80 cooperatives (implemented 2008), the Central GOA Rockfish Program (implemented 2011), and the Pacific Cod Trawl Cooperative Program (2023). It continues to support this objective by considering and in some cases developing new LAPP programs, conducting reviews, and making adjustments to existing programs.

Example: Use of terms that have evolved or changed

The 2004 PSEIS was written at a transformative time in Federal fisheries management that included leadup to the 2006 reauthorization of the MSA and early work by Councils and NMFS to develop ecosystem-based fishery management principles and practices. Some goals and objectives include terms that have evolved over time.

- *Goal 3 - Preserve food web*

  The Council continues to implement the objectives of this goal, though the goal itself could be more broadly worded to refer to the attributes of ecosystems. For example, the Council's Ecosystem Policy refers to “productive, biodiverse, resilient marine ecosystems that support a range of services.”

- *Objective 12: Continue to protect the integrity of the food web through limits on harvest of forage species*

[6] Subsequent references to Groundfish FMP amendments include the FMP (BSAI or GOA) followed by the amendment number. The date provided refers to the date of final Council action. Summaries of amendments, implementation dates, and additional resources are available at for the BSAI at https://www.fisheries.noaa.gov/management-plan/groundfish-bering-sea-and-aleutian-islands-management-plan and for GOA at https://www.fisheries.noaa.gov/management-plan/groundfish-gulf-alaska-management-plan.

The Council could consider whether this objective is meant to apply to the concept of forage species more broadly or whether it is tied to the FMPs' specification of "forage fish species" under the ecosystem component category.

- *Objective 28 - Develop a Marine Protected Area policy in coordination with national and state policies.*

  This objective reflects Federal administration and State of Alaska policy priorities at the time the 2004 PSEIS was developed. The term Marine Protected Area has been more narrowly defined over time, and is no longer as widely used in reference to MSA-designated fishery management areas (see Section 5.6).

- *Goal 8 - Increase Alaska Native Consultation*

  The term "consultation" refers to formal, government-to-government consultations between NMFS AKR and Tribes pursuant to Executive Order (E.O.) 13175. At the time of the 2004 PSEIS, the Council used the term consultation in a more general way to include participation, engagement, and outreach.

Example: Research-focused objectives

Several objectives refer to encouraging research programs by NMFS and other entities. The Council generally does not fund or conduct original research, and instead supports these objectives through actions including the MSA requirement to develop research priorities (described under Goal 9);[7] receiving informational reports, and through considering such information in its management recommendations. The Council could consider whether it continues to be useful to include research objectives that are not directly actionable, though do help reinforce and communicate Council priorities. Examples include the following.

- *Objective 16: Encourage research programs to evaluate current population estimates for non-target species with a view to setting appropriate bycatch limits, as information becomes available.*

- *Objective 24: Encourage programs to review status of endangered or threatened marine mammal stocks and fishing interactions and develop fishery management measures as appropriate.*

- *Objective 29: Encourage development of a research program to identify regional baseline habitat information and mapping, subject to funding and staff availability.*

- *Objective 42: Encourage a coordinated, long-term ecosystem monitoring program to collect baseline information and compile existing information from a variety of ongoing research initiatives, subject to funding and staff availability*

[7] Section 302(h)(7) of the Magnuson-Stevens Act requires the Council, in conjunction with the SSC, to develop multi-year research priorities for fisheries, fisheries interactions, habitats, and other areas of research that are necessary for management purposes and to submit those priorities to NMFS.

Example: Evolving Council priorities and tradeoffs

Some goals and objectives describe a desired outcome along with a specific strategy for achieving that outcome. In some cases the Council's approach to supporting an objective may change or become more nuanced over time. For example, Objective 40 focuses on "increased" data reporting requirements:

- *Objective 40: Improve community and regional economic impact costs and benefits through increased data reporting requirements.*

The Council's recent recommendations to remove Economic Data Reporting requirements (2025) and to not to pursue a crew data collection program (2024), have decreased or maintained rather than adding to economic data reporting requirements. In both examples the Council's recommendations reflect an evaluation of the burden relative to the utility of data collection requirements.

Example: Goals that may not fully align with their associated objectives

The Council could consider whether objectives continue to be appropriately organized under broader goal statements. In particular, Goal 8 - Increase Alaska Native Consultation focuses specifically on Alaska Native consultation and participation in the Council management process, although the objectives and Council work tracked under Goal 8 are also relevant to other groups and participants in the Council process.

For example, Goal 8 includes objectives related to incorporation of Local Knowledge and Traditional Knowledge. LK refers to knowledge formed based on personal and/or shared experience. It is not inherently Indigenous knowledge or TK, and can be held by non-Indigenous people. Additionally, the Council's work to improve meeting accessibility and outreach to rural communities includes, though is not limited to, supporting participation by Alaska Native communities. The Council could consider whether there is a different way of structuring these goals and objectives to recognize integration of LKTKS and public engagement as priorities that are not wholly nested under a goal specifically focused on Alaska Native participation.

Example: Other clarifications

If the Council considers making any adjustments to the Groundfish Management Policy, this would also be an opportunity to make minor clarifications and clean up existing language. Examples include the following.

- *Objective 40: Improve community and regional economic impact costs and benefits through increased data reporting requirements.*

  This objective may be missing a verb, such as "evaluate" or "assess" community and regional economic impact costs and benefits.

- *Objective 45: (abbreviated): Continue to cooperate and coordinate management and enforcement programs with the Alaska Board of Fish, Alaska Department of Fish and Game, and Alaska Fish and Wildlife Protection, the U.S. Coast Guard, NMFS Enforcement, International Pacific Halibut Commission, Federal agencies, and other organizations…*

This objective could be updated to reflect that responsibility for the enforcement of wildlife statutes and regulations is now held by the Division of Alaska Wildlife Troopers (formerly Alaska Fish and Wildlife Protection).

3.3 Climate resilience

As part of this review the Council can reflect on the attributes that make a management policy climate resilient. Developing a climate resilient management policy is one of the Council's three stated objectives for climate resilience under the IRA funding opportunity:

1. Develop a climate-resilient management policy.

2. Continue work to incorporate local and traditional knowledge.

3. Strengthen the consideration of uncertainty and risk in harvest specifications.

Developing a climate resilient management policy was formerly the focus of the Programmatic Evaluation, on which the Council decided to take no further action.[8] The Council has not explicitly defined what constitutes a climate resilient management policy, although it has given significant thought to the topic of climate resilience. The Climate Readiness Synthesis prepared by the Climate Change Task Force (Section 5.10) aims to define and assess climate readiness.[9] The Council has also extensively considered the attributes of climate resilience and opportunities for instilling greater resilience in the Council management process through recent discussions and work products. These include the Climate Change Task Force Climate Readiness Synthesis and final report[10], the Climate Resilience Workplan[11], and discussions at the 2024 Climate Scenarios Workshop.[12]

The Council could refer to these resources in reflecting on whether the current Groundfish Management Policy is climate resilient, and also consider questions such as the following.

- What might be the value added by updating the Groundfish Management Policy or other Council policy guidance to support climate resilience?

- Are the climate resilience and adaptation strategies that have been discussed in the Council process aligned with the existing Groundfish Management Policy? Are there any that might not align well?

- Where is there a clearly defined process for consideration of climate information, risks, and potential impacts already incorporated; for example, through the harvest specifications process and analytical documents? Where might there be a need to be more explicit or consistent regarding when, why, how to consider climate resilience and incorporate climate information?

Alignment of FMP guidance with climate resilience definitions and attributes

The Council's climate resilience resources (described further in Section 5.10 on Climate Resilience) help define and focus the Council's consideration of climate resilience. The Council could consider how the

[8] D4 Council motion, October 2025
[9] Climate Readiness Synthesis, prepared by the Climate Change Task Force. NPFMC 2022.
[10] Climate Change Task Force Final Report. Prepared by the Climate Change Task Force. November 2024
[11] D1 Council motion, December 2024
[12] Climate Scenarios Workshop Report

ideas and strategies in these documents align with the current Management Policy. These resources were developed in consideration of all of the Council's FMPs and are not specific to the Groundfish FMPs.

Climate Resilience Workplan (ongoing)

The intent of the Workplan is to guide near-term actions for enhanced climate resilient management in the GOA and the BSAI supported by emerging climate information and advice. Priorities include:

- Incorporate climate forecast linked management advice
- Incorporate climate-driven interactions and cascading impacts through use of ecosystem indicators and models
- Consider and incorporate dynamic management tools to increase in-season adaptation capacity
- Review tier systems, consider climate-informed biomass targets and limits, and climate-robust or forecast-informed harvest control rules

Climate Scenarios Workshop (2024)

The Climate Scenarios Workshop Report describes attributes of and challenges to climate resilience identified by workshop participants. The report also summarizes key messages and ideas for building climate resilience into the Council process, management measures, and science and information inputs. Themes include:

- Council planning and prioritization
- Public participation
- Adaptation, diversification, and flexibility
- Early warnings and responsiveness
- Diverse information inputs and knowledge systems
- Social and economic vulnerability and information needs

Climate Readiness Synthesis (2022)

The CRS defines climate resilience as "whether management tools, assessments, and information on-ramps are designed to address and consider long-term climate change and the unprecedented conditions and unique challenges that it presents." The Climate Readiness Synthesis (2022) assessed the climate readiness of the management process focusing on 1) the management system, 2) Stock Assessment and Fishery Evaluation (SAFE) reports and products including Ecosystem Status Reports (ESRs); and 3) knowledge bases that support climate readiness and adaptation, focusing on indigenous community, industry, and NMFS and Council knowledge bases. The report provided recommendations for improvements in each area.

Onramps for climate information and considerations

While the Groundfish Management Policy does not explicitly refer to climate change, it does refer to mechanisms within the Council process that facilitate the use of climate information and thus support

climate resilience. These examples may help the Council consider different approaches to embedding climate resilience in the Groundfish Management Policy, whether that means explicitly referring to climate resilience, or implicitly by referring to processes that support climate readiness and resilience.

- *Goal 1 - Avoid overfishing.* The Council is currently considering opportunities for improving climate resilience through adjustments to the harvest control rules for Acceptable Biological Catch (ABC).
- *Goal 3 - Preserve food web.* The Council and NMFS continue to refine and build on tools for providing ecosystem information and context to inform Council recommendations and harvest specifications. For example, advances will include stock-specific quantitative evaluations of ecosystem indicators to improve parameter estimates in assessment models.
- Goal 6 - *Reduce and avoid impacts to habitat*. This goal and objectives refer to the Council's responsibilities for describing and minimizing adverse impacts to Essential Fish Habitat. The required 5-year EFH Reviews provide a process for incorporating advances in habitat science and modeling, including up-to-date data on species distributions and environmental conditions.

Alignment of goals and objectives with potential climate resilience strategies

The Council may want to reflect on whether goals and objectives capture the scope of actions that might be considered to support climate resilience. For example:

- *Goal 7 - Promote equitable and efficient use of fishery resources*, and the associated objectives, address actions to limit capacity and overcapitalization including through the use of rights-based management programs. Participants at the Climate Scenarios Workshop commented that the rigidity of current management programs reflect past decisions that were intended to manage access, limit effort, and provide stability, rather than to provide flexibility and opportunities for diversification in response to changing conditions.

3.4 Council policy guidance

The Council management process includes multiple layers of policy guidance that have been voluntarily developed and adopted by the Council and that supplement the statutory requirements of the MSA, the National Standards and guidelines, and NMFS policy and procedural directives. Examples of additional Council policy guidance include the Groundfish Management Policy, Fishery Ecosystem Plan goals and objectives, and standalone Council policies that span multiple FMPs such as the Ecosystem Policy, LKTKS Policy Statement, EFH consultation policy, and Spatial Management Policy. As part of this review process, the Council could consider how it intends for the different components of Council policy guidance to work together.

Particularly relevant to this review are Council guidance related to ecosystem-based fisheries management. In 2014 the Council adopted an Ecosystem Policy (Appendix 1) that includes a value statement, vision statement, and an implementation strategy. The statement was intended to synthesize the Council's policy on ecosystem-based management and work in concert with other management objectives, including those in the Groundfish Management Policy. In adopting the policy, the Council recognized that challenges are potentially in store with respect to climate change, and that the ecosystem approach will help the Council find opportunities to learn from, adapt, and improve management in the

future.[13] The BS FEP, adopted in 2018, includes a set of ecosystem goals paired with process objectives, research objectives, and ecosystem objectives (Appendix 1).

The Council could consider how this policy guidance supplements and aligns with the Groundfish Management Policy. The Ecosystem Policy and BS FEP provide a more detailed vision of ecosystem-based fisheries management that recognizes qualities of sustaining ecosystem resilience, biodiversity, ecosystem productivity and provision of ecological services. They also recognize the importance of providing benefits to commercial, recreational, and subsistence user groups. The Ecosystem Policy applies to all of the Council's work. The BS FEP goals and objectives also reflect Council values and practices that could be applicable to all of Alaska's marine ecosystem regions, though were developed specifically for the Bering Sea region. While the Groundfish FMP goals and objectives do not refer to climate, both the Ecosystem Policy and Bering Sea FEP goals and objectives do refer to climate change and the need to account for and respond to changing conditions.

Another consideration is the significance or weight attributed to management priorities. FMPs provide for ongoing management of the groundfish fisheries, and policy guidance specified at the FMP level provides a strong statement of the Council's intent. This guidance informs future Council actions, provides guidance to analytical staff, and provides a mechanism for public transparency and accountability regarding the information and considerations that guide Council management recommendations. The FMP describes these objectives as guideposts to help focus consideration of potential management measures. To the extent that a policy is adopted in the FMP, future regulations must then be consistent with that policy as Section 304(b) of the MSA requires that implementing regulations are consistent with the relevant FMP.

3.5 Management Approach

The Groundfish Management Policy includes the Management Approach statement in addition to goals and objectives. Past reviews focused on reviewing Council actions relative to goals and objectives, and did not explicitly address the Management Approach statement. As part of this review process the Council could reflect on the text Management Approach and consider the same questions of whether it continues to provide timely and relevant guidance in light of current Council practices and priorities, operations of the groundfish fisheries, and understanding of the GOA and BSAI marine ecosystems.

Management Approach

The Council's policy is to apply judicious and responsible fisheries management practices, based on sound scientific research and analysis, proactively rather than reactively, to ensure the sustainability of fishery resources and associated ecosystems for the benefit of future, as well as current generations. The productivity of the North Pacific ecosystem is acknowledged to be among the highest in the world. For the past 25 years, the Council management approach has incorporated forward looking conservation measures that address differing levels of uncertainty. This management approach has in recent years been labeled the precautionary approach. Recognizing that potential changes in productivity may be caused by fluctuations in natural oceanographic conditions, fisheries, and other, non-fishing activities, the Council intends to continue to take appropriate measures to insure the continued sustainability of the managed species. It will carry out this objective by considering reasonable, adaptive management measures, as described in the Magnuson-Stevens Act and in

[13] February 2014 Council newsletter

conformance with the National Standards, the Endangered Species Act, the National Environmental Policy Act, and other applicable law. This management approach takes into account the National Academy of Science's recommendations on Sustainable Fisheries Policy.

As part of its policy, the Council intends to consider and adopt, as appropriate, measures that accelerate the Council's precautionary, adaptive management approach through community-based or rights-based management, ecosystem-based management principles that protect managed species from overfishing, and where appropriate and practicable, increase habitat protection and bycatch constraints. All management measures will be based on the best scientific information available. Given this intent, the fishery management goal is to provide sound conservation of the living marine resources; provide socially and economically viable fisheries for the well-being of fishing communities; minimize human-caused threats to protected species; maintain a healthy marine resource habitat; and incorporate ecosystem-based considerations into management decisions.

This management approach recognizes the need to balance many competing uses of marine resources and different social and economic goals for sustainable fishery management, including protection of the long-term health of the resource and the optimization of yield. This policy will use and improve upon the Council's existing open and transparent process of public involvement in decision-making.

Values and priorities

The Management Approach includes aspirational statements that help communicate *how* in addition to *what* the Council intends to achieve. These statements align with MSA requirements, including using the best scientific information available (BSIA), ensuring sustainability, optimizing yield, and considering the wellbeing of communities.

The Management Approach also captures what the Council considers distinctive about the North Pacific management process, including the high productivity of North Pacific ecosystems, the Council's precautionary and adaptive approach, and the Council's stewardship role in ensuring the sustainability of fishery resources and ecosystems for current and future generations. The statement also uses the phrases "judicious and responsible," "proactively rather than reactively," and refers to the Council's "open and transparent process of public involvement in decision-making." The Council could consider whether these continue to be the values it wants to communicate, and whether there is anything it would like to add, modify, or clarify.

Other themes

The Council could also reflect on the Management Approach taking into consideration the same themes identified earlier in this section, including the following.

Consistency with Federal law and policy

The Management Approach states the Council's conformance with the MSA, including the National Standards, and other applicable law, including the ESA and NEPA. This may influence whether the Council feels it is necessary to also continue to restate conformance with these requirements through individual goals and objectives.

Durability over time

The Council could consider whether any elements of the Management Approach could be updated based on the considerations identified in Section 2. These include: references to intended management actions, the use of terms that have evolved or changed, practices that have been more clearly defined over time, and Council priorities that may have changed. For example, the statement refers to the recommendations on Sustainable Fisheries Policy from the National Academy of Science's 1999 report Sustaining Marine Fisheries, which established principles of ecosystem-based fisheries management that remain consistent with contemporary fisheries science and management.[14] Many of these recommendations, such as considering uncertainty and accounting for discard and bycatch mortality, were incorporated into the 2006 reauthorization and into longstanding Council practices. The phrase "For the past 25 years" in the Management Policy is also dated, given that the PSEIS was finalized in 2004.

Climate resilience

The Management Approach does not explicitly refer to climate change or resilience, though as part of applying a precautionary and adaptive approach, notes that "potential changes in productivity may be caused by fluctuations in natural oceanographic conditions." If the Council wanted to include guidance on climate change and resilience, it could consider whether the Management Approach, which spans multiple goals and objectives, would be the appropriate place.

Council policy guidance

As with goals and objectives, the Council could consider how the Management Approach aligns with and complements other Council policy guidance. Like other Council policy guidance the Management Approach provides high level guidance that spans goals and objectives, but also carries the added weight of being contained within the FMP.

[14] National Research Council. 1999. Sustaining Marine Fisheries. Washington, DC: The National Academies Press. Available from: https://www.nationalacademies.org/read/6032
See also 2004 PSEIS 4.11-7 for recommendations.

4. Next steps for the Council

The Groundfish Management Policy Review is a process requirement that does not require any changes to be made. In order to support a robust discussion, the Council and public may find it valuable to reflect on whether the Management Policy continues to provide timely and relevant guidance in light of current Council practices and priorities, operations of the groundfish fisheries, and understanding of the BSAI and GOA marine ecosystems. The following discussion topics and prompts are based on Section 3 of this document. The Council may also identify other questions to consider in discussion.

Discussion questions

1. Restating Federal laws and policy: Does the Council want FMP-level guidance to continue to restate the National Standards and requirements for consistency with other Federal laws? The Council and NMFS must ensure consistency with Federal laws, so the explicit statements to that effect in the FMP are redundant. Moreover, the Council and NMFS expressly address these legal requirements during the development and implementation of every fisheries management action (for example, analytical documents include a section on consistency with the National Standards).

2. Durability and relevance: Does the current Groundfish Management Policy, including the Management Approach, goals, and objectives, continue to be relevant and durable over time?

    a. Are there elements of the Management Policy that could be constraining or missing or not well aligned with the Council's current practices and priorities? Although staff staff did not identify any strong concerns or mismatches between the Management Policy and current Council practices, the Council may identify opportunities for clarification.

    b. Does the Council want to consider updates or revisions to reflect current priorities and practices? Is it important to wordsmith goals and objectives for transparency and clarity, or does this review provide a check-in and documentation that meets this purpose?

    c. The Groundfish Management Policy was organized in a way that aligned with the Council's priorities at the time of the 2004 PSEIS. Does the structure of the Policy align well with the Council's priorities today? Is this structure useful for tracking progress relative to the Management Policy?

3. Climate resilience: What makes a management policy climate resilient? Do the existing Policy, goals, and objectives–alone and/or in combination with other policy guidance and planning documents–adequately capture the Council's climate resilience planning strategies and priorities?

4. Council policy guidance: How does the Council use its existing policy guidance, including the Management Policy, standalone Council priorities, and BSFEP goals and objectives? How does the Council intend for these layers of policy guidance to work together?

Potential next steps

The Council could consider actions that include but are not limited to the following. The Council may also direct staff to provide further analysis of issues identified in this document before determining how to proceed.

No action: The Council may conclude that the existing Management Approach, goals, and objectives, and the context of other Council policy guidance, continue to be sufficient and no changes are warranted. This could also be an outcome if the Council identifies areas in which Council practices may have evolved since the Management Approach was originally developed, but determines that FMP guidance can be interpreted in the context of current practices and information. This review document could serve as documentation of how the interpretation of goals and objectives can change over time and in response to changing conditions.

Modify the Groundfish FMP Management Approach, goals, and/or objectives: The Council could consider changes to any or all portions of the Management Policy. The scale of changes could range from minor wording adjustments, to adding or removing goals or objectives, to an entire rewriting of some or all portions of the Management Policy. Any changes to existing guidance, regardless of scope, would require an FMP amendment, and the Council would want to consider the time and resources required relative to other Council priorities. Updating, revising, or developing new policy guidance would not result in immediate nor required changes to specific fisheries management measures.

Whether or not the Council wants to consider changes to the Management Policy it could also consider other steps, including but not limited to the following. These options are not mutually exclusive.

Develop new policy guidance: In place of, or in addition to, changes to FMP guidance, the Council could consider developing a standalone policy focusing on climate resilience (or any other topic). Such a policy could be specific to the Groundfish FMPs, or developed as a cross-FMP policy.

Develop a workplan for implementing goals and/or objectives: One of the purposes of Management Policy Reviews is to consider whether the Council should take additional actions in support of the Policy. The Council could identify aspects of the Management Policy to prioritize for implementation, such as a particular goal or objective, and develop a workplan to guide next steps. (Note, the Council already implemented a Climate Resilience Workplan).

Guidance for future policy reviews: As part of this review process the Council could consider how it wants to conduct future Groundfish Management Policy reviews. The Groundfish FMPs require reviews to be conducted but do not specify how reviews should be conducted or what tools should be used to track the Council's work relative to the Management Policy. The Council could use this and subsequent reviews to address the questions above, in addition to or in place of considering any changes. For example, subsequent reviews could be used to help document changes in the interpretation of the Management Policy.

Guidance for Groundfish Workplan Updates: Council staff provide a two-meeting snapshot of Council work relative to Management Policy goals and objectives under E - Staff Tasking at every Council meeting. This is a voluntary tracking tool and not a requirement of the Groundfish FMPs. The Council could consider whether there are other approaches that would be useful for tracking the Council’s work relative to goals and objectives over time, specifically for groundfish and/or for all of the Council’s FMPs.

Policy reviews for other FMPs: The requirement for regular Management Policy reviews is specific to and contained within the Groundfish FMPs. If the Council finds this discussion valuable it could consider following a similar approach for the Fishery Management Plan for the Bering Sea/Aleutian Islands King and Tanner Crabs (Crab FMP). If the Council intends to develop new, cross-FMP policy guidance it may be appropriate to do so following a Crab FMP Management Policy Review.

Outreach and communication opportunities: This expanded version of the Groundfish Management Policy review may help the Council identify topics that would benefit from plain language outreach materials to tell a more comprehensive story of how groundfish management policies have evolved over time.

5. Additional context for individual goals and objectives

Section 5 of this review document provides a narrative description of how the Council's work during the review period (2022-2025) aligns with each goal and its associated objectives. **This is provided as additional detail and context for the discussion in Sections 1-4.** The description of each goal includes a discussion section with a summary of key points, accomplishments, and challenges, and context for the Council's review of each goal and the associated objectives. The description of individual FMP objectives provides additional information on recent Council actions and issues during the review period. In some cases, actions prior to the review period are included to provide more context for the evolution of groundfish management since 2004, though this is not intended to be comprehensive.

5.1 Goal 1: Avoid Overfishing

Objectives

1. Adopt conservative harvest levels for multi-species and single species fisheries and specify optimum yield.
2. Continue to use the optimum yield cap for the BSAI and GOA groundfish fisheries.
3. Provide for adaptive management by continuing to specify optimum yield as a range.
4. Provide for periodic reviews of the adequacy of F40 and adopt improvements, as appropriate.
5. Continue to improve the management of species through species categories.

Discussion

Key points, accomplishments, and challenges

The Council continues to achieve Goal 1 and implement the precautionary management approach stated in the Management Approach. Since the Management Policy was adopted no groundfish stock has been overfished or subject to overfishing. The Council has also been a national leader in setting and adhering to sustainable harvest levels over time. The harvest specifications process established by the Council pre-dates and helped shape the 2006 reauthorization of the Magnuson-Stevens Act, and subsequent revisions to the National Standard 1 Guidelines[15], that established more stringent standards for Councils to avoid and end overfishing and rebuild overfished stocks and provide guidance for accounting for uncertainty in setting harvest levels. The Council also supported Goal 1 during the review period by participating in national-level dialogue with NMFS and the other Regional Fishery Management Councils, and by hosting the 7th national meeting of the Scientific Coordination Subcommittee, which focused on adapting fisheries management to a changing ecosystem.

The Council may increasingly face climate-related impacts to the performance of the established groundfish harvest strategies. For example, Gulf of Alaska Pacific cod experienced high natural mortality due to unusually warm conditions 2014-2016, prompting significant reductions in ABC compared to previous years. The Council, with the support of NMFS AFSC stock assessment authors, Plan Teams, and the SSC, continues to make progress on tools for documenting and considering climate-related uncertainty. Moving forward the Council may consider adjustments to improve climate resilience and strengthen consideration of uncertainty and risk through ABC control rules (Section 5.10).

[15] NOAA Fisheries resources for MSA National Standard 1, including a timeline of revisions, available from: https://www.fisheries.noaa.gov/national/laws-and-policies/national-standard-1-related-resources

Context for review of Goal 1 and objectives

Goal 1 is consistent with MSA language and the Council's precautionary management approach. The Council could consider how the objectives under Goal 1 relate to adaptations the Council may consider for enhancing the climate resilience of its harvest specifications process, including reviewing the tier system and harvest strategies (Objective 4) and the use of optimum yield ranges (Objectives 2 and 3).

Council work aligned with Goal 1 and objectives

Objective 1

Adopt conservative harvest levels for multi-species and single species fisheries and specify optimum yield.

The Council supports Objectives 1 as well Objectives 2 and 3 through the established, precautionary annual harvest specifications process of adopting the SSC's recommendations for Overfishing Limits (OFL) and ABC, and through setting Total Allowable Catch (TAC). The Council has a long history of adopting precautionary, scientifically informed harvest levels.

Recent issues and actions

Harvest Control Rule adjustments (in progress)

The Council is currently considering opportunities for improving climate resilience through adjustments to the harvest control rules for ABC (See Section 5.10).

Modifications to accountability measures by adding inseason management authority (in progress)

The Council continues to support Objective 1 by making adjustments when needed to adhere to established harvest levels. In 2024, the Council began considering changes to accountability measures after the Annual Catch Limit (ACL; set equal to ABC) for the BSAI rougheye and blackspotted rockfish complex was exceeded in three out of four years. The National Standard 1 guidelines require that the system of ACLs and AMs be reevaluated and modified if necessary when an ACL is exceeded more than once in a four-year period. The Council initiated an analysis for increasing accountability measures by adding inseason management authority for NMFS to better control harvest of groundfish stocks to prevent catch from exceeding the ACL.[16]

2025 harvest specifications process

After a prolonged government shutdown in the fall of 2025 prevented the timely completion of some planned groundfish stock assessments, the SSC relied on the most recent peer-reviewed 2024 SAFE reports and the projections for 2026 resulting from those approved assessments (for all groundfish except GOA deep water flatfish and GOA Pacific cod), along with new information including 2025 catch reports, ecosystem status information, and contextual information from the 2025 BSAI and GOA bottom trawl surveys. While there were some disruptions to the groundfish harvest specifications process this year, it continued to be transparent, robust, and used peer-reviewed scientific data, similar to normal years.[17]

Clarification of spatial apportionment procedures (2025)

[16] C5(d) Council motion, October 2025
[17] NPFMC December 2025 Press Release

The Council supported clarifications to the spatial apportionment of ABCs, the role of Council advisory bodies in recommending these apportionments, and timing within the process. Spatial apportionments of ABC are biologically informed and developed through recommendations from the stock assessment author and Plan Team, with the SSC ultimately recommending these apportionments. These apportionments inform the Council's recommendations for TACs and serve to spatially distribute harvest based on survey and catch data; however, the Council's TACs recommendations can also include consideration of a wide range of socioeconomic considerations. Additionally, the Council will use the term "biologically informed recommended distributions" or BRDs, reflecting that spatial apportionments of ABCs are not ACLs.[18]

Groundfish Stock Prioritization review (2023)

The Council recently reviewed the current approach for determining groundfish stock assessment frequency, which aims to improve efficiency while meeting the need for timely and high-quality assessments. This was a five-year review of the stock assessment prioritization approach that was first developed by NMFS and the Council in 2017 and applies NMFS guidance on prioritizing fish stock assessments.[19] As an outcome of the review the Council supported SSC recommendations that included maintaining the assessment frequency of some stocks and accepting the proposed reduced frequency of other stocks as recommended by AFSC.[20]

Separation of rockfish complexes (2023)

The Council concurred with Groundfish Plan Team recommendations to separate management of GOA Demersal Shelf Rockfish (DSR) and Other rockfish stock complexes beginning in 2025.[21]

Best Scientific Information Available report (2022)

During the review period, the Council and NMFS continued efforts to ensure use of the best available scientific information in support of Goal 1 and related objectives. The Council prepared and submitted a framework describing how it implements the NOAA Fisheries BSIA framework, as required of all regions by a 2018 NOAA Procedural Directive.[22]

History

The Council first developed an objective and measurable definition of overfishing in 1990 (BSAI 16, GOA 21) Subsequent amendments revised the ABC and overfishing definitions to facilitate more conservative, risk-averse management measures when stock size and mortality rates are not fully known. (BSAI 44/GOA 44 in 1996, later revised by BSAI 56/GOA 56, 1998). These amendments implemented the current tier system and harvest policies, which are precautionary both in terms of aligning harvest strategies with information availability and quality, and reducing fishing mortality at lower biomass levels. BSAI 48/GOA 48 (2003) established the current harvest specifications process.

Objectives 2 and 3

[18] C-5c Council motion October 2025; also see the Council's 2015 Spatial Management Policy available at https://www.npfmc.org/how-we-work/management-policies/
[19] Methot Jr., Richard D. (editor). 2015. Prioritizing fish stock assessments. U.S. Dep. Commer., NOAA Tech. Memo. NMFS-F/SPO152, 31 p.
[20] D3 motion, February 2023
[21] C3 Council motion, October 2023
[22] D4 BSIA Directive Report, April 2022

Continue to use the optimum yield cap for the BSAI and GOA groundfish fisheries.

Provide for adaptive management by continuing to specify optimum yield as a range.

The Council supports Objectives 2 and 3 on an ongoing basis. Optimum yield (OY) has been set in the Groundfish FMPs and in regulations as a range, with the upper limit serving as a cap on total removals. The definitions of OY in both Groundfish FMPs provide for some flexibility, stating OY may need to be respecified in the future if major changes occur in the estimate of MSY for the groundfish complex. Likewise, OY may need to be respecified if major changes occur in the ecological, social, or economic factors governing the relationship between OY and MSY.[23]

While Objective 2 refers to an OY cap, it is more accurate to refer to OY as a range with an upper and lower bound. Additionally, Objective 3 refers to "continuing" to specify optimum yield as a range. This could be more clearly worded to state that OY is established in the FMP and regulations, and is not specified on an annual basis.

Recent issues and actions

The Council has recognized that it may be appropriate to reevaluate the role and effectiveness of existing OY ranges, particularly in light of climate-driven impacts to Federally-managed species in both regions. The existing OY ranges are derived from aggregate estimates of single-species MSY, without accounting for species interactions or climate-related impacts on species distribution and productivity. Looking ahead, the Council could assess how current or alternative OY ranges would perform relative to an objective to maintain ecosystem productivity and function and support climate resilience.

History

Early amendments to the Groundfish FMPs established multi-year, multispecies OY ranges of 1.4 to 2.0 million mt for the BSAI and 116,000-800,000 mt for the GOA (BSAI 1, 1982; GOA 15, 1986). For BSAI FMP-managed groundfish this OY range represents 85% of estimated historical MSY of target species; for GOA FMP-managed groundfish, this OY range was based on the examination of historical and recent catches, recent determinations of ABC, and recent and past estimates of MSY for each major groundfish species. The Council's initial reason for specifying OY on a multi-species rather than a single-species was to improve efficiency in the harvest specifications process. Specifying OY as a range also helps provide a measure of stability by communicating expectations to the public.

At the time of Amendment specifying an OY range for the BSAI in the FMP proactively affirmed the Council's intent to maintain 2 million mt as the upper bound on OY. In addition, Public Law 108-199, 2004 states that the optimum yield for groundfish in the Bering Sea and Aleutian Islands Management Area shall not exceed 2 million metric tons. This does not preclude the Council from considering a BSAI OY range with an upper bound that is lower than 2m mt.

In the BSAI, the OY cap operates as a constraint on total groundfish removals, because on an annual basis the sum of stock and species-level ABCs recommended by the SSC regularly exceeds 2 million mt. The Council considers how to maintain removals below the 2 million mt cap through the annual TAC setting process, which involves considering tradeoffs between the availability and value of stocks, ultimately setting some TACs below ABC, particularly for Bering Sea pollock.

[23] See section 3.2.2.2 of both Groundfish FMPs

Objective 4

Provide for periodic reviews of the adequacy of F40 and adopt improvements, as appropriate.

In Objective 4 the term F40 refers to a reference point embedded in the groundfish harvest control rules, below which fishing mortality is reduced relative to stock status. The term F40 is also used here as a shorthand reference to the tier system and associated harvest control rules within the groundfish FMPs that govern the setting of OFL and ABC. The Council supports Objective 4 through the annual harvest specifications process. While the Council continues to meet the intent of Objective 4, this could also be worded to more clearly reflect the Council's intent to ensure the ongoing use of BSIA and understanding, including current work to review the tier system and its associated harvest control rules to consider climate resilience.

Recent issues and actions

The Council's ongoing work to explore climate-informed adaptations to ABC harvest control rules (Section 5.10) meets this objective's focus on periodic review and improvement. Objective 4 is also supported by periodic review of stock assessments by the Center for Independent Experts (CIE), which provides a formal external process for independent expert reviews of NMFS' scientific products and programs. CIE reviews are not intended to select a preferred model nor a specific recommendation for ABC or OFL; they are intended to seek advice on whether the current model configurations represent BSIA. In addition CIE reviewers can provide advice on how to improve models in the future.[24] Reviews completed during the review period include GOA rex sole and EBS pollock (2025), GOA demersal shelf rockfish and GOA pollock (2024), ESRs (2023), and BSAI Pacific Ocean perch (2022).[25]

History

BSAI/GOA Amendments 56 (1998) establish the current groundfish tier system and harvest control rules. Maximum allowable harvest rates are prescribed through a set of six tiers in descending order, corresponding to descending order of information availability. For most tiers, ABC is based on F40% (F40), which is the fishing mortality rate associated with an equilibrium level of spawning per recruit (SPR) equal to 40% of the equilibrium level of spawning per recruit in the absence of any fishing. To further minimize the possibility of catches jeopardizing a stock's long term productivity, there is a buffer established between ABC and OFL. Harvest rates used to establish ABCs are proportionally reduced below a target stock size thereby allowing for automatic rebuilding. If the biomass of any stock falls below B40%, the fishing mortality is reduced relative to stock status. This serves as an implicit rebuilding plan should a stock fall below a reasonable abundance level.

In 2002, the Council contracted with independent reviewers (Goodman et al., 2002) to assess the adequacy of the F40 harvest policy, and determine whether changes should be considered for individual species or for ecosystem needs. The independent review panel found that the current harvest strategies were sufficiently conservative for most stocks, though recommended that alternative harvest strategies be explored for some species, notably rockfish.[26]

[24] D4 BSIA Directive Report, April 2022
[25] Past CIE Peer Review Reports are available at https://www.st.nmfs.noaa.gov/science-quality-assurance/cie-peer-reviews/index
[26] Goodman et al 2002. Scientific Review of the Harvest Strategy Currently Used in the BSAI and GOA Groundfish Fishery Management Plans.

Objective 5

Continue to improve the management of species through species categories.

The Groundfish FMPs use multiple species categories to distinguish between target and ecosystem component species, and to characterize information availability and the need for conservation and management. The Council continues to support Objective 5 through ongoing adjustments to species categories to improve the management of individual species.

Recent issues and actions

Recent examples of shifting species between categories include reclassifying squid (BSAI 117/GOA 106, 2018) and sculpins (BSAI 121/GOA 110, 2020) as ecosystem component species and prohibiting directed fishing.

History

The Groundfish FMPs use species categories to identify those stocks in need of conservation and management. Target species are defined as those species that support either a single species or mixed species target fishery, are commercially important, and for which a sufficient data base exists that allows each to be managed on its own biological merits. The Council can make adjustments to how species are split or combined within this category, following procedures described in the FMP and without the need for an FMP amendment. The grouping of species takes into account both biological and management considerations.

Ecosystem component species include prohibited species, which must be immediately returned to the sea except when retention is required or authorized; and forage fish species, grenadiers, squids, and sculpins, for which management measures are established in regulations implementing the FMP. Within the ecosystem component category, these species groupings reflect different management needs and strategies, including whether they are considered in need of conservation and management. The term ecosystem component species replaces the earlier category of “other species,” and is defined as stocks that a Council or the Secretary has determined do not require conservation and management, but desire to list in an FMP in order to achieve ecosystem management objectives (§ 600.305(d)(13)).

5.2 Goal 2: Promote Sustainable Fisheries and Communities

Objectives

6. Promote conservation while providing for optimum yield in terms of the greatest overall benefit to the nation with particular reference to food production, and sustainable opportunities for recreational, subsistence, and commercial fishing participants and fishing communities.
7. Promote management measures that, while meeting conservation objectives, are also designed to avoid significant disruption of existing social and economic structures.
8. Promote fair and equitable allocation of identified available resources in a manner such that no particular sector, group or entity acquires an excessive share of the privileges.
9. Promote increased safety at sea.

Discussion

The discussion of Goal 2 is structured differently from the other sections of this document. Objectives 6-9 are primarily derived from the National Standards, with which all of the Council's management recommendations must be consistent. In the Groundfish Workplan Updates provided at every Council meeting, specific Council actions are not tracked relative to this goal and objectives; instead updates state that these considerations are applied in all Council management recommendations, and are supported by specific actions tracked under Goals 1, 7, and 8. This section provides additional context for the wording of each objective.

Council work aligned with Goal 2 and objectives

Objective 6

Promote conservation while providing for optimum yield in terms of the greatest overall benefit to the nation with particular reference to food production, and sustainable opportunities for recreational, subsistence, and commercial fishing participants and fishing communities.

The wording of this objective is based on the MSA definition of OY: *The amount of fish which will provide the greatest overall benefit to the Nation, particularly with respect to food production and recreational opportunities, and taking into account the protection of marine ecosystems.* (MSA §3(33)(A)) Objective 6 additionally identifies specific user groups and includes communities by including the phrase "recreational, subsistence, and commercial fishing participants and fishing communities." User groups including subsistence users are identified in the Council's Ecosystem Policy, and Ecosystem Objective 14 of the BSFEP also recognizes non-consumptive and cultural values.

Objective 7

Promote management measures that, while meeting conservation objectives, are also designed to avoid significant disruption of existing social and economic structures.

Objective 7 is not directly derived from the National Standards, though it is consistent with the focus of National Standard 8: providing for the sustained participation of and, to the extent practicable, minimizing adverse impacts on fishing communities; and also recognizes stability as a business and planning consideration. This objective also complements Objective 31, which refers to providing economic and community stability to harvesting and processing sectors, and both objectives align with the rationale and

objectives for implemented LAPPs. Two LAPPs, the Halibut and Sablefish IFQ[27] and the Central Gulf of Alaska Rockfish Program, explicitly identify stability as program objectives and stability is an implicit objective for all LAPPs. Avoiding disruption and promoting stability for user groups and communities were also common themes of discussion at the 2024 Climate Scenarios Workshop, and could be among the objectives considered by the Council for climate resilience initiatives.

Objective 8

Promote fair and equitable allocation of identified available resources in a manner such that no particular sector, group or entity acquires an excessive share of the privileges.

Objective 8 is worded similarly to National Standard 4, which states that *allocation shall be (A) fair and equitable to all such fishermen; (B) reasonably calculated to promote conservation; and (C) carried out in such manner that no particular individual, corporation, or other entity acquires an excessive share of such privileges.* The concept of excessive shares is also addressed by MSA §303A(c)(5)(D) on LAPPs, and the use of accumulation limits, or caps, to prevent the excessive accumulation of harvesting privileges is a required component of catch share program reviews. Thus, Objective 8 has been supported by the Council's consideration of new LAPP programs and by reviews of existing programs undertaken during the review period (Section 5.7). This objective is also supported by NMFS's guidance to the Councils to ensure fisheries allocations are periodically evaluated, and the allocation reviews conducted by the Council to meet this requirement (also Section 5.7).

Objective 9

Promote increased safety at sea.

Objective 9 is consistent with National Standard 10: *Conservation and management measures shall, to the extent practicable, promote the safety of human life at sea.* The Council regularly receives advice and informational reports in support of Objective 9.

- USCG reports: As specified by the MSA, a representative of the USCG holds a non-voting seat on the Council and is able to advise the Council on enforcement and safety considerations. The USCG Arctic District also provides regular reports to the Council that include updates on commercial fishing vessel safety violations and cases of search and rescue.
- Enforcement Committee: The Council maintains a standing committee tasked with advising the Council on monitoring and compliance issues, including measures that could affect safety at sea.
- National Institute for Occupational Safety and Health (NIOSH) updates: The NIOSH Center for Maritime Safety and Health Studies (CMSHS) provided presentations and updates on commercial fishing safety research and recent safety incidents and fatalities to the Council.

Although the Council must always consider safety of human life at sea when weighing consistency with the National Standards, during the review period, the Council took action on issues for which safety at sea was an important consideration. For example, the Council's recent recommendations to revise MRA regulations (Section 5.4) included providing an exemption from MRA requirements in cases of medical or

[27] This review addresses the intersection of Pacific halibut management with BSAI and GOA groundfish fisheries through the Halibat and Sablefish IFQ program and through PSC management; however this document does not address Council activities specifically related to halibut.

mechanical emergencies, or poor weather, that end a fishing trip earlier than planned. By easing this regulatory burden in cases of emergencies, as described above, this measure promotes safety of human life at sea. The Council's 2022 recommendations to improve BSAI small vessel access to Pacific cod (Section 5.7) supports safety at sea, by improving flexibility for small vessels to determine when and under what conditions to fish.

5.3 Goal 3: Preserve Food Web

Objectives

10. Develop indices of ecosystem health as targets for management.
11. Improve the procedure to adjust acceptable biological catch levels as necessary to account for uncertainty and ecosystem factors.
12. Continue to protect the integrity of the food web through limits on harvest of forage species.
13. Incorporate ecosystem-based considerations into fishery management decisions, as appropriate.

Discussion

Key points, accomplishments, and challenges

The Council and NMFS AFSC are national leaders in the implementation of ecosystem-based fisheries management. The Management Approach, along with Goal 3 and its associated objectives, demonstrate the Council was proactive in stating a commitment to incorporating ecosystem-based information and considerations into its management recommendations. Effective partnership with AFSC has contributed to the ongoing development of products and tools including ESRs, ESPS, and risk tables to help ensure ecosystem information is considered at the appropriate point in the process, consistently interpreted and documented, and is accessible and transparent to the public.

Ecosystem-based fishery management (EBFM) practices can support the Council's ability to respond to changing ecosystem conditions. The well established and iterative process of reviewing and considering ecosystem information through the annual harvest specifications process helps ensure that SSC and Council recommendations reflect up-to-date information including the impacts of environmental variability.

Context for review of Goal 3 and objectives

The Council's Ecosystem Policy and BSFEP goals and objectives, provided in Appendix 1, provide additional, more detailed policy guidance related to ecosystems. Goal 3 and objectives 10-13 were developed early in the history of Councils and NMFS conceptualizing ecosystem-informed fisheries management, which is reflected in the wording of Goal 3. More recent policy guidance refers to marine ecosystems rather than using the term food web. For example, the Council's Ecosystem Policy refers to "productive, biodiverse, resilient marine ecosystems that support a range of services."

Council work aligned with Goal 3 and objectives

Objective 10

Develop indices of ecosystem health as targets for management.

The Council supports this objective on an ongoing basis through its review of the ESRs prepared annually by NMFS AFSC. ESRs are provided at the Large Marine Ecosystem (LME) level for the Eastern Bering Sea, Aleutian Islands, and Gulf of Alaska. They provide information on ecosystem status and trends as context for the SSC's ABC and OFL recommendations, as well as for the Council's TAC recommendations for groundfish. ESRs include assessments based on ecosystem indicators that reflect the current status and trends of ecosystem components including physical oceanography, biology, and human dimensions. The information in ESRs is integrated into the annual harvest recommendations through inclusion in stock-specific risk tables, in specific stock assessments as ecosystem considerations, presentations to the Groundfish Plan Teams, presentations to the SSC and Council in their annual October and December meetings, and submission of the final report to the Council in December. ESRs and associated products, including concise "In Brief" documents, are constantly evolving and tailored to the Council's priorities.

For a select set of groundfish stocks, ESPs provide a standardized framework for compiling and evaluating relevant stock-specific ecosystem and socioeconomic indicators. They also communicate linkages and potential drivers of the stock within the stock assessment process. The ESP process creates a traceable pathway from the initial development of indicators to management recommendations and serves as an on-ramp for developing ecosystem-linked stock assessments.[28]

ESRs and ESPs are complementary documents that together support Objective 10 by allowing for incorporating ecosystem information into stock-specific Risk Tables and thereby directly considering ecosystem dynamics in management decisions. Both documents inform the SSC's ABC and OFL recommendations, as well as the Council's final TAC recommendations for groundfish.

Objective 11

Improve the procedure to adjust acceptable biological catch levels as necessary to account for uncertainty and ecosystem factors.

The Council has well established procedures for accounting for uncertainty and ecosystem factors in setting ABC through the annual groundfish harvest specifications process, and these procedures are outlined in part in the FMPs, which summarize the specification of ABC and include a determination whether conditions exist that warrant setting ABC at a value lower than the maximum permissible value.[29] The specification of ABC is informed by the advice of stock assessment authors and the BSAI and GOA Plan Teams, and must be consistent with the final recommendations of the SSC. The SSC routinely recommends ABCs below the maximum permissible amount; for example, in 2024 for sablefish, BSAI Greenland turbot and sharks, and for the GOA rougheye and blackspotted rockfish complex.[30] As noted under Goal 1: Avoid Overfishing, this objective is forward-looking in accounting for scientific uncertainty, and pre-dates the 2006 reauthorization of the MSA and revised National Standard 1

[28] As described in S. Kalei Shotwell (Editor) Appendix 2.1 Ecosystem and Socioeconomic Profile of the Pacific cod stock in the Gulf of Alaska - Report Card
[29] BSAI and GOA Groundfish FMPs Section 3.2.3.3.1
[30] AFSC scientists prepared a Risk Table Update Report, which summarizes the use of risk tables for the harvest specifications process 2018-2024.

Guidelines. NMFS AFSC scientists support the Council's achievement of this objective through the ongoing development of tools to document and consider uncertainty and ecosystem factors.

Risk tables (Dorn, 2020)[31] were first introduced for groundfish management in 2018 and are now provided in groundfish SAFE reports for full and update assessments. They provide a standardized way of documenting concerns that are not explicitly addressed by stock assessment models, including concerns related to the assessment model, population dynamics, the ecosystem, and fishery performance; as well as the severity of these concerns (normal, increased, or extreme). This information helps inform the SSC's determination of whether to reduce the ABC from the maximum permissible ABC to account for uncertainty that is not already accounted for in a stock assessment or in the tier system. Both ESRs and ESPs also support Objective 11 via the use of risk tables.

Objective 12

Continue to protect the integrity of the food web through limits on harvest of forage species.

The Council took early proactive measures to manage fishing-related impacts to the forage base in Alaska and prevent the development of a directed commercial fishery in Federal waters. A 1997 Council action (BSAI 36/GOA 39) defined a forage fish species category and authorized measures to prevent the development of a commercial directed fishery for forage fish, including a closure to direct fishing and prohibition on the sale, barter, trade, or processing of forage species, with incidental catches limited to a maximum retention allowance. Herring are managed as Prohibited Species, not as a forage fish, in both the BSAI and GOA. In the BS trawl fisheries there is a PSC limit set at limit 1% of annual biomass of eastern Bering Sea herring, apportioned among trawl fishery categories, and attainment may close Herring Savings Areas.

The Council and Groundfish Plan Teams receive a biennial report on the status of forage species in the BSAI and GOA. This document presents available data on trends in abundance and distribution of forage populations and a description of their interactions with Federally managed fisheries through bycatch. Information on abundance and trends in forage species is also provided in annual ESRs. The Council could consider whether this objective is meant to apply to the concept of forage species more broadly or whether it is tied to the FMPs' specification of "forage fish species" under the ecosystem component category.

Recent issues and actions

Forage fish workshop (considered but not pursued)

In 2021, Council staff prepared a discussion paper for the Ecosystem Committee to summarize the state of scientific understanding and current research initiatives focused on forage fish, and to consider whether there could be further opportunities for Committee or Council engagement on this topic. The Ecosystem Committee, Plan Teams, and SSC supported holding a public forage fish workshop to consider topics that could include the ecosystem role of forage species, availability of information, potential environmental impacts, and management intersections. The Council endorsed this proposal though did not proceed with a workshop.

[31] Dorn, M. W., & Zador, S. G. (2020). A risk table to address concerns external to stock assessments when developing fisheries harvest recommendations. Ecosystem Health and Sustainability, 6(1). https://doi.org/10.1080/20964129.2020.1813634

Objective 13

Incorporate ecosystem-based considerations into fishery management decisions, as appropriate.

Objective 13, along with the Management Approach statement, emphasize the Council's intent to consider and adopt ecosystem-based management principles. This section outlines milestones during and prior to the review period–in addition to those described above under Objectives 10-12–that cumulatively strengthen the Council's ability to integrate ecosystem information and considerations into its management recommendations.

Recent issues and actions

Harvest specifications process (ongoing)

On an ongoing basis, the Council receives and considers during the harvest specifications process LME-scale contextual ecosystem information through the presentation of ESRs, along with contextual and predictive stock-specific ecosystem information through ESPs via select stock assessments.

Climate Action Module (completed 2024)

The Council convened the Climate Change Task Force (CCTF) from 2020-2024 to develop and execute a work plan for a Climate Action Module under the Bering Sea FEP. This body developed a Climate Readiness Synthesis (2022) and provided its final report in December 2024, leading to the Council's adoption of a Climate Resilience Workplan based on CCTF recommendations. (See Section 5.10).

Local Knowledge, Traditional Knowledge, and Subsistence Information Protocol (completed 2023)

The Council convened an LKTK Task Force from 2019-2023, also as an Action Module under the Bering Sea FEP. The Council adopted the Protocol developed by the Task Force in 2023. (See Section 5.8).

Gulf of Alaska Fishery Ecosystem Plan (considered but not pursued)

During the review period the Council considered but did not proceed with developing a Gulf of Alaska Fishery Ecosystem Plan. While the Ecosystem Committee and Council initially supported further scoping, the Ecosystem Committee ultimately recommended to the Council that it consider waiting until other ongoing initiatives (including GOACLIM and the PEIS; see Section 5.10) reach a level of completion that would facilitate them informing a Gulf FEP prior to deciding whether to initiate an FEP.[32]

History

Milestones completed prior to the review period continue to provide policy guidance and structure to the Council's work incorporating ecosystem information and principles into fisheries management decisions.

Bering Sea Fishery Ecosystem Plan (2018)

The Bering Sea FEP establishes a framework for the Council's continued progress towards ecosystem-based fishery management (EBFM) of the Bering Sea fisheries, and relies and builds on the Council's existing processes, advisory groups, and management practices. The core FEP document that has been adopted identifies management goals and objectives for the FEP and for monitoring of the

[32] Ecosystem Committee Report, January 2023

Bering Sea ecosystem, and describes how the FEP framework will support research projects, termed Action Modules, to address Council priorities. The FEP builds from the Council's Ecosystem Vision Statement, adopted in 2014, and is a continued commitment by the Council to use the best science to sustainably manage fisheries using a precautionary, transparent, and inclusive process.

Arctic Fishery Management Plan (2009)

The Council developed a Fishery Management Plan for Fish Resources of the Arctic Management Area, recognizing that changing ecosystem conditions could lead to the development of commercial fisheries in the U.S. Arctic Exclusive Economic Zone (EEZ) off Alaska. The Arctic FMP takes a precautionary approach to prevent the emergency of unregulated or inadequately regulated commercial fisheries until sufficient research and information exist.

Aleutian Islands Fishery Ecosystem Plan (2007)

The Council developed the Aleutian Islands FEP as a pilot project and a first effort to look across FMPs to consider ecosystem context for fishery management decisions at a regional level. It was designed as an educational tool and resource that would work with the existing Council process, and provide a structure for identifying indicators specific to the region, and identifying sources of uncertainty as well as research and information needs.

5.4 Goal 4: Manage Incidental Catch and Reduce Bycatch and Waste

Objectives

14. Continue and improve current incidental catch and bycatch management program.
15. Develop incentive programs for bycatch reduction including the development of mechanisms to facilitate the formation of bycatch pools, vessel bycatch allowances, or other bycatch incentive systems.
16. Encourage research programs to evaluate current population estimates for non-target species with a view to setting appropriate bycatch limits, as information becomes available.
17. Continue program to reduce discards by developing management measures that encourage the use of gear and fishing techniques that reduce bycatch which includes economic discards.
18. Continue to manage incidental catch and bycatch through seasonal distribution of total allowable catch and geographical gear restrictions.
19. Continue to account for bycatch mortality in total allowable catch accounting and improve the accuracy of mortality assessments for target, prohibited species catch, and non-commercial species.
20. Control the bycatch of prohibited species through prohibited species catch limits or other appropriate measures.
21. Reduce waste to biologically and socially acceptable levels.

Additional objective (BSAI only): Continue to improve the retention of groundfish where practicable, through establishment of minimum groundfish retention standards.[33]

[33] This is included as Objective 22 in the BSAI Groundfish FMP only. It is not numbered here to maintain consistent numbering of objectives in both Groundfish FMPs.

Discussion

Key points, accomplishments, and challenges

Goal 4 of managing incidental catch and reducing bycatch and waste has been a strong focus of the Council's work and capacity during and prior to the review period. The work described in this section illustrates themes such as a more thorough accounting of and commitment to minimizing bycatch, cumulative refinements of PSC management, and moving from static area closures toward more dynamic regulatory and non-regulatory strategies. Effective monitoring and catch accounting are essential to performance and accountability of bycatch management programs and the attainment of these objectives, and over the last 20 years there have been major advances in ability to integrate and benefit from advances in technology including through electronic monitoring.

The Council is also increasingly contending with climate-driven impacts to target and non-target and especially PSC species. For example, the purpose and need for the Bering Sea chum salmon bycatch action recognizes that the best available science suggests that ecosystem and climate changes are the leading causes of recent chum salmon run failures, while also recognizing the Council must address interactions with the groundfish fisheries using the tools and authorities available.

This section of the review document highlights examples of Council actions but is not intended to be comprehensive of the full range of bycatch-related actions and tools used in the groundfish fisheries. Witherell and Fey (2023) and recent updates to the Council provide a more comprehensive overview of bycatch management strategies in place and trends over time.[34]

Context for review of Goal 4 and objectives

Goal 4 is consistent with National Standard 9: *Conservation and management measures shall, to the extent practicable, (A) minimize bycatch and (B) to the extent bycatch cannot be avoided, minimize the mortality of such bycatch*. The objectives associated with Goal 4 describe the tools the Council continues to use for managing and reducing bycatch.

Council work aligned with Goal 4 and objectives

Objective 14

Continue and improve current incidental catch and bycatch management program.

Objective 14 encompasses and is supported by all of the incidental catch and bycatch management strategies used in the groundfish fisheries, and the work described in more detail under Objectives 15-21.

Based on a February 2026 update to the Council, in 2025, across regions and gear types, 3.5% of total catch was discarded in the halibut and groundfish fisheries. The BSAI, GOA and Alaska-wide bycatch rates were all at record lows in 2025, and 5 of the 18 fishery groups had record low bycatch rates in 2025.[35]

[34] Witherell and Fey. Fish Bycatch in the North Pacific Halibut, Hippoglossus stenolepis, and Groundfish Fisheries MFR 85(1-4), 2023 https://doi.org/10.7755/MFR.85.1-4.3 Also see B - Bycatch Report, February 2026.
[35] From B - Bycatch Report, February 2026. This report was in response to a December 2025 Council request for staff to provide updated bycatch information based on Witherell and Fey 2023. This update utilizes the National Bycatch Report Dataset 2026 compiled by AKFIN.

Objective 15

Develop incentive programs for bycatch reduction including the development of mechanisms to facilitate the formation of bycatch pools, vessel bycatch allowances, or other bycatch incentive systems.

Objective 15 states the Council's support for approaches that incentivize bycatch avoidance behavior, in addition to other bycatch management tools (e.g., PSC limits, maximum retainable amounts, time and area closures, etc). Incentive-based approaches can provide industry with responsibility and operational flexibility within specified parameters developed by the Council and NMFS. No new incentive programs were created in regulation during the review period (2022-2025), but existing programs and additional industry-led efforts support Objective 15 and Goal 4 during the review period.

The Council's existing catch share programs and cooperative structures establish management measures that help the industry work together cooperatively to efficiently harvest the allocated species while also administering incentive-based bycatch management strategies that are designed to minimize bycatch at all times and ensure compliance with strict bycatch caps. The Council has developed several catch share programs that allow or require the formation of cooperatives including the American Fisheries Act (AFA), Amendment 80, Central Gulf Rockfish, and BSAI Pacific Cod Trawl programs. The Incentive Plan Agreements used in the Bering Sea directed pollock fishery and recommended adjustments under the recent Bering Sea chum bycatch action, described further under Objective 20, are another example of an incentive-based approach.

Other practices related to incentive-based management strategies include the piloting and implementation of electronic monitoring technology, industry information-sharing for bycatch avoidance, and development of catch handling practices (e.g., halibut decksorting). In some cases Exempted Fishing Permits are used to test and provide proof of concept. The Council's steps to address unobserved crab mortality, including by encouraging ongoing research, and pelagic trawl gear innovation, described further under Objective 17, can also be considered to align with Objective 15.

Objective 16

Encourage research programs to evaluate current population estimates for non-target species with a view to setting appropriate bycatch limits, as information becomes available.

The Council supports Objective 16 through the MSA required process for setting research priorities (Objective 43), and by receiving informational reports. As with other research objectives the Council does not fund or conduct research, but can encourage research by communicating priorities and information needs.

The Council also meets this objective by using information from NMFS AFSC, ADFG, and other research programs that contribute to current population estimates for non-target species, including those managed as PSC. For example, PSC limits for Tanner and snow crab in the BSAI management area are based on their abundance as indicated by the NMFS bottom trawl survey; PSC limits of halibut in the Amendment 80 fleet are based on the most recent survey values for the IPHC setline survey index and the NMFS EBS trawl survey index, and the annual PSC limit for Chinook salmon in the directed fishery for pollock in the Bering Sea subarea is scaled to levels of higher and lower abundance based on the State of Alaska's post-season inriver Chinook salmon run size index.

Objective 17

Continue program to reduce discards by developing management measures that encourage the use of gear and fishing techniques that reduce bycatch which includes economic discards.

During the review period the Council invested significant time in work to understand, account for, and reduce unobserved mortality of crab and impacts to benthic habitat resulting from interactions with the BSAI groundfish fisheries.[36] This work stems from an October 2022 Council motion identifying Bristol Bay red king crab and snow crab as a priority conservation concern, recognizing ecosystem change as the primary driver of poor recruitment and low abundance, and the need for a comprehensive, ecosystem-based approach.[37] The Council has considered both regulatory and non-regulatory approaches, and is currently encouraging industry-led approaches and collaborative research that help characterize and reduce unobserved mortality, with a focus on pelagic trawl gear innovations. Ultimately this work could continue to inform regulatory strategies, industry-led strategies, or a combination of approaches. This issue spans the 2022-2025 review period and addresses multiple objectives under Goal 4, particularly 14, 17, 18, 19, and 20.

The Council's consideration and discussions of static area closures for Bristol Bay Red King Crab (BBRKC) provided the framing for addressing unobserved mortality of crab in the groundfish fisheries. The Council considered though did not proceed with closures via emergency action in 2022, and initiated though ultimately took no further action on a separate rulemaking process.[38] The Council's February 2024 motion identified next steps that included 1) using inseason information and results from ongoing research to develop framework agreements for dynamic closures and crab avoidance measures, 2) incentivizing pelagic trawl gear innovation, 3) developing a revised regulatory definition of pelagic trawl gear (addressed under Goal 6).[39]

Additional, concurrent work contributed to identifying potential strategies and information needs for accounting for and managing unobserved mortality. ADFG developed a 2022 Crab Conservation Workplan that outlined potential conservation and management actions for addressing interactions between Federally managed groundfish fisheries and Bristol Bay Red King Crab and Eastern Bering Sea snow crab. These included non-regulatory measures, potential area closures, potential changes to management boundaries, and potential changes to bycatch management.[40] Also in 2022, in response to an SSC recommendation the Council also formed the Unobserved Fishing Mortality Working Group tasked with developing an approach to estimate the magnitude of unobserved mortality for crab stocks and how these estimations may be utilized in BSAI crab stock assessments.[41] The final report recognized that estimating unobserved mortality for all gear types is a high priority but not currently feasible, and identified research needs that were integrated with the Council's research priority setting process.[42]

The Council has since taken steps to track progress and request updates on industry-led bycatch avoidance strategies (e.g., December 2023 industry updates[43]) and the status of collaborative research on trawl gear

[36] A timeline of Council discussions related to pelagic gear definition, trawl gear innovations, and related agenda items is provided in Table 1 of the C3 Pelagic Trawl Gear Innovations Discussion Paper.
[37] D2 Council motion, October 2022
[38] C1 Council motion December 2022; C2 Council motion February 2024
[39] C2 Council motion February 2024
[40] D2 Crab Conservation Workplan, December 2022
[41] D2 Council motion, December 2022
[42] D1 Unobserved Fishing Mortality Working Group Report, June 2024
[43] B8 agenda items, December 2023

innovation that could help meet the information needs identified by the unobserved mortality working group.[44]

Earlier examples/other gear modifications

Two exempted fishing permits approved during the review period are relevant to Objective 17, including a project testing modifications to the footrope of pelagic trawl gear in the Bering Sea pollock fishery, and a project developing and testing salmon excluders in the Bering Sea pollock fishery. Earlier examples include halibut decksorting and trawl sweep elevation requirements (see Goal 6).

Objective 18

Continue to manage incidental catch and bycatch through seasonal distribution of total allowable catch and geographical gear restrictions.

This objective is supported by management measures that include time and area restrictions, seasonal and area-based apportionments of TACs that are set in the annual groundfish harvest specifications, and other measures in regulation.[45]

At the time this objective was written, the phrase "geographical gear restrictions" primarily referred to closures for bycatch management. Over time the Council's understanding of the utility and best use of fixed closures has identified limitations, and the Council has increasingly considered more dynamic tools, in some cases with static closures as a backstop. Some groundfish management programs with cooperative structures have the tools to administer dynamic closures and voluntary avoidance measures.

The seasonal distribution of TAC may be considered to distribute catch over the course of a fishing year for operational, bycatch management, and other conservation-related reasons. For example, PSC of Pacific halibut is apportioned by sector and season in the Gulf of Alaska and the Bering Sea directed pollock fishery is divided into A (roe-bearing) and B (non- roe bearing) seasons.

GOA Tanner crab protections (in progress)

During the review period, the Council discussed the issue of groundfish fishery impacts on Tanner crab in the Kodiak region, and is currently considering a new groundfish fishing area closure on the east side of Kodiak Island in areas known to have consistently high densities and abundance of Tanner crab. The alternatives to be analyzed include new seasonal and/or year-round closures on the east side of Kodiak as well as reconsideration of existing crab closure areas. The Council intends to establish criteria and a timeline to review the effectiveness of the new closure areas.[46]

[44] See Pelagic Trawl Gear Innovations Summaries on the Council website: https://www.npfmc.org/pelagic-trawl-gear-research-summaries/
[45] For a summary of management measures in each each region, see Table ES-2 in both FMP documents, Summary of Management Measures for the BSAI Groundfish Fishery and GOA Groundfish Fishery
[46] D2 GOA Tanner Crab Council Motion, April 2025

Objective 19

Continue to account for bycatch mortality in total allowable catch accounting and improve the accuracy of mortality assessments for target, prohibited species catch, and non-commercial species.

Monitoring of the vessels in the full coverage and partial coverage categories provides a comprehensive data collection program from which to extrapolate and provide accurate estimates of bycatch mortality discards,[47] and effective catch accounting and monitoring as discussed further under Goal 9 are essential to achieving this objective. At the time of the 2004 PSEIS, Objective 19 documented existing practices and was also forward-looking for the time; it was adopted prior to National Standard 9 and before it became standard practice to account for all mortality in stock assessments.

The Council continues to support efforts to understand, account for and assess bycatch mortality, including through work to address unobserved crab mortality and promote pelagic trawl gear innovation and research as described under Objective 17. Other actions relevant to this objective include bycatch management strategies that apply a discard mortality rate. Halibut PSC management uses discard mortality rates set by gear type and updated based on observer information; these halibut discard mortality rates are reviewed through the harvest specifications process and set in the annual groundfish harvest specifications. Through multiple EFPs, industry tested catch handling and monitoring procedures in an effort to reduce the mortality of discarded halibut. NMFS subsequently modified regulations to allow voluntary halibut deck sorting on trawl catcher processors when operating in non-pollock groundfish fisheries off Alaska.

Objective 19 was also supported by the Council's 2020 Standardized Bycatch Reporting Methodology Assessment (SBRM).[48] This assessment was in response to national guidance published by NMFS for meeting MSA Section 303(a)(11), which requires that any fishery management plan (FMP) establish a standardized reporting methodology to assess the amount and type of bycatch occurring in the fishery, and include conservation and management measures to minimize bycatch and the mortality of bycatch that cannot be avoided. The Council's assessment determined that the groundfish FMPs were already in compliance with SBRM guidance, and that no FMP amendments were necessary.

Objective 20

Control the bycatch of prohibited species through prohibited species catch limits or other appropriate measures.

Since 2004 the Council has taken cumulative steps to limit, account for, and reduce PSC in the groundfish fisheries. Prohibited species include Pacific halibut, herring, salmon, and crab. PSC is a separate ecosystem component species category within the FMPs, and incidental catch of PSC must be immediately released unless retention is required or authorized. In general, when a target fishery reaches a PSC limit apportionment or seasonal allocation, the associated management area closes for the remainder of the year or season. PSC limits are set in the Groundfish FMPs' implementing regulations, and specified as a framework (e.g., limits set on an annual basis within a specific framework based on specific information) or as a number (e.g., for herring a fixed percentage of annual biomass, for Chinook salmon a fixed number).

[47] Witherell and Fey 2023
[48] D2 Standardized Bycatch Reporting Methodology Report, February 2020

Tools for managing PSC in the groundfish fisheries vary by species and target fishery, and are described further below. Management of PSC has evolved significantly since 2004 through changes that include the adoption of hard caps for some species, and a shift from static area closures toward a broader array of regulatory and non-regulatory tools. The North Pacific Observer Program has been critically important for supporting precise and timely catch accounting to support PSC limitations in the groundfish fisheries. Ongoing improvements to the Observer Program including the 2013 restructuring and adoption of electronic monitoring as a tool are discussed further under Goal 9.

Recent issues and actions

BSAI Chum salmon bycatch (final action in 2026)

In February 2026 the Council took final action on measures to constrain bycatch of chum salmon of Western Alaska origin in the Bering Sea pollock fishery.[49] While final action was in 2026, the development of this action spanned the 2022-2025 review period and was a major focus of the Council's work and of public participation in the Council process. The purpose and need for this action recognize that while the best available science suggests that ecosystem and climate changes are the leading causes of recent chum salmon run failures, non-Chinook (primarily chum) salmon are taken in the Eastern Bering Sea pollock trawl fishery which reduces the amount of salmon that return to Western and Interior Alaska rivers and subsistence fisheries.

The Council's recommendation includes a bycatch limit of 45,000 Western Alaska chum salmon, apportioned among the four pollock fishing sectors, with a corridor closure for the Bering Sea pollock fishery. If a sector reaches its portion of the bycatch corridor cap it must close 50% of the corridor for the remainder of the June 10-August 31 period, including four specific statistical areas. Establishing a Western Alaska chum salmon bycatch cap was critical to the Council's approach because approximately 80% of the chum salmon in the overall bycatch are not from Western Alaska. The majority of the pollock fishery's chum salmon bycatch are Russian and Asian hatchery chum, as reported in NOAA's annual genetics analyses. These measures are tied to an index of chum salmon abundance, and would not be in effect at high levels of abundance.

Finally, the Council's recommendation includes changes to the pollock fishery's contractual salmon avoidance plans. The changes focus the fishery on avoidance of Western Alaska chum salmon, incorporating genetics information into inseason avoidance measures, and more transparency in reporting by requiring greater communication among the pollock fishery, salmon users, Alaska Native Tribes, and Tribally-authorized consortia and fish commissions.

The alternatives evaluated under the BSAI chum salmon bycatch action build on tools and strategies linked with other objectives, including Objective 15, developing incentive programs for bycatch reduction; and Objective 16, encouraging research programs to evaluate current population estimates for non-target species.

History

Significant changes and milestones in PSC management are described below. **This section is not comprehensive of all PSC management measures; it highlights significant Council actions**

[49] Notice of Council Action: Council action to establish a limit on Western Alaska chum salmon bycatch in the Bering Sea pollock fishery. NPFMC, February 2026.

2004-present that provide the foundation for PSC management in the groundfish fisheries, and the Council's ongoing work to control bycatch of PSC in support of Objective 20.

Abundance-based management of BSAI halibut PSC

In 2021 the Council took final action (BSAI 123) recommending an abundance-based approach to managing halibut PSC catch in the BSAI Amendment 80 trawl fleet. PSC for this fleet was previously specified as a fixed amount; as of the effective date of this action in 2024, it is linked to abundance and determined annually based on survey indices from the IPHC setline survey and NMFS EBS trawl survey according to a formula specified in the FMP and implementing regulations. Previously, through Amendment 111 in 2014 the Council reduced halibut PSC limits for 4 BSAI groundfish sectors (Amendment 80, BSAI trawl limited access, non-trawl, and Western Alaska CDQ Program).

BSAI Chinook and chum salmon

Current approaches for managing BSAI Chinook and chum salmon bycatch in the Bering Sea pollock fishery (including the Council's 2026 final action, above) include a combination of binding hard caps and incentive-based approaches to bycatch avoidance. Measures implemented under BSAI FMP Amendment 91 (2009) combine a hard cap for Chinook salmon with measures to encourage cooperation in establishing an incentive plan agreement (IPA). An IPA is a voluntary private contractual agreement among vessel owners, CDQ groups, or both that provides incentives to avoid Chinook salmon bycatch at all levels of Chinook salmon abundance and salmon encounters rates (FMP). Amendment 91 effectively established 2 PSC limits, a higher one for sectors that participate in an IPA and meet a minimum performance standard, and a lower one for those not meeting both criteria. Both limits are scaled downward in years of lower abundance. Additionally, if performance standards are not met in 3 of 7 consecutive years the lower limit remains in effect. This incentivizes minimizing bycatch at all levels of abundance.

A later Council action (BSAI 110, 2015) incorporated a more comprehensive approach to managing salmon bycatch that included incorporating chum salmon into existing IPAs, increasing incentives for fishermen to avoid Chinook and chum salmon , and reducing the Chinook salmon PSC limit and performance standard in years with low Chinook salmon abundance in western Alaska. Prior to Amendment 91, the Council's approach to salmon PSC avoidance included limits, static area closures, and a voluntary rolling hotspot closure system supported industry cooperative structures.

GOA Chinook salmon

In 2008 the Council established hard caps for Chinook salmon PSC catch, specific to the directed pollock trawl fisheries in the Central and Western GOA (GOA 93, 2008). A later action implemented a Chinook salmon PSC limit apportioned among the three sectors comprising the Western and Central GOA non-pollock trawl fisheries (Trawl C/P, Rockfish Program CV, and Non-Rockfish Program CV). (GOA 97, 2012). The Council later recommended allowing NMFS inseason managers to allow for the reapportionment of unused Chinook salmon PSC between the pollock and non-pollock sectors (GOA 103, 2015).

Objective 21

Reduce waste to biologically and socially acceptable levels.

In addition to addressing the other objectives under Goal 4, which focus on limiting and accounting for bycatch interactions and mortality, some Council actions have focused on reducing waste in the form of economic discards, regulatory discards, and depredation. In addition to the actions highlighted below, Objective 21 is supported by all Council actions related to Goal 4 and that address the biological as well as the social, economic, and cultural aspects of bycatch management. For example, the recent Bering Sea chum salmon bycatch management action recognizes the cultural, nutritional, economic, and spiritual value of chum salmon to the well-being of western and interior Alaska residents, families and communities.

Maximum Retainable Amount (MRA) adjustments (2025)

In October 2025, the Council took final action recommending modifications to the regulations that implement maximum retainable amounts (MRA) of groundfish species.[50] MRAs are a mechanism to both limit and allow for some retention of species closed to directed fishing while a vessel operator is fishing for species that are open to directed fishing, balancing the need to reduce harvest of incidental catch species while also minimizing regulatory discards.

Small sablefish (2025)

In April 2025, the Council took final action recommending regulatory changes that would allow some flexibility for catcher vessels in the fixed gear IFQ and CDQ fisheries to release small sablefish (under 22").[51] Previously most of the fleet was required to retain sablefish of all sizes. This action originated in response to industry concerns about encountering catches of small, low-value fish as recent large year classes of sablefish recruit to the fishery. The purpose and need for this action recognizes that limited operational flexibility to carefully release sablefish may increase the value of the commercial harvest and allow small fish to contribute to the overall biomass.[52]

Greenland turbot (2023)

During the review period the Council also took action on a regulatory amendment to authorize longline pots as a legal gear in the directed fishery for Bering Sea Greenland turbot.[53] This action addressed killer whale depredation on hook-and-line gear that caused the non-trawl sector of the BS Greenland turbot fishery to stop targeting turbot.

Earlier actions

Earlier actions aligned with Objective 21 include fixed gear catcher vessel rockfish retention requirements (BSAI 119/GOA 107; 2020). GOA 101 (2017) authorized the use of pot gear for targeting GOA sablefish and required retention of Pacific halibut if sufficient IFQ is held by fishermen to cover the halibut IFQ caught using pot longline gear (GOA 101; 2017). Similarly, BSAI 118 required retention of legal-sized

[50] C1 Motion, MRA Adjustments, October 2025
[51] C2 small sablefish motion, April 2025
[52] C2 Small Sablefish Release Analysis, April 2025
[53] C5 Council motion April 2023

halibut provided the IFQ or CDQ permit holder holds sufficient halibut IFQ or CDQ for that retained halibut. One purpose of both actions was to minimize whale depredation and seabird interactions.

The Council has also used retention and utilization requirements as a tool for reducing waste in the groundfish fisheries. The Council first adopted an improved retention/improved utilization program (IR/IU) for all groundfish target fisheries the BSAI in 1996 and GOA in 1997 (BSAI 49, GOA 49). When this became effective in 1998, it required 100% retention of pollock and Pacific cod, and substantially decreased discards of these species. Subsequent refinements to retention and utilization requirements have aimed to balance the objective of reducing waste with feasibility and cost to industry.

The BSAI Groundfish FMP includes an additional objective related to retention standards: *Continue to improve the retention of groundfish where practicable, through establishment of minimum groundfish retention standards*. This objective was added to the BSAI Groundfish FMP with Amendment 97, which addressed Amendment 80 vessel replacement and indirectly improved groundfish retention in the Amendment 80 fleet without imposing minimum retention standards.

5.5 Goal 5: Avoid Impacts to Seabirds and Marine Mammals

Objectives

22. Continue to cooperate with the U.S. Fish and Wildlife Service (USFWS) to protect ESA-listed species, and if appropriate and practicable, other seabird species.
23. Maintain or adjust current protection measures as appropriate to avoid jeopardy of extinction or adverse modification of critical habitat for ESA-listed Steller sea lions.
24. Encourage programs to review status of endangered or threatened marine mammal stocks and fishing interactions and develop fishery management measures as appropriate.
25. Continue to cooperate with NMFS and USFWS to protect ESA-listed marine mammal species, and if appropriate and practicable, other marine mammal species.

Discussion

Background

The discussion of Goal 5 is structured differently from other sections of this document to provide context for the Council's responsibilities with regard to seabirds and marine mammals. Goal 5 and Objectives 22-25 reflect the requirement for U.S. fisheries management to be consistent with the requirements of other regulations, including the Endangered Species Act (ESA), the Marine Mammal Protection Act (MMPA), and the Migratory Bird Treaty Act, which pertain to species including marine mammals and seabirds. Measures for protecting the endangered western distinct population segment of Steller sea lions have had a particularly strong influence on groundfish management since 2004.

ESA Section 7, Interagency Cooperation requires Federal agencies to ensure, in consultation with the NMFS or USFWS, that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of listed species or destroy or adversely modify critical habitat. NMFS and USFWS share responsibility for implementation of the ESA. NMFS is also the "action" agency for ESA consultations for Federal fisheries actions given its role in approving or disapproving the conservation and management recommendations of the Council on behalf of the Secretary of Commerce. The Council is encouraged to work with NMFS and USFWS to design or modify new actions in a manner that avoids or minimizes impacts on listed species or designated critical habitat. NMFS AKR Sustainable Fisheries Division

consults with USFWS and NMFS AKR Protected Resources Division on the species under each agency's jurisdiction.

After reinitiation of Section 7 consultation, USFWS completed a Biological Opinion on the effects of the groundfish fisheries managed under the BSAI FMP and GOA FMP on ESA-listed seabirds and designated critical habitat under U.S. Fish & Wildlife Service's jurisdiction on March 8, 2021. USFWS concurred with NMFS's determination that the groundfish fisheries were not likely to adversely affect the northern sea otter or its designated critical habitat. For all other listed seabird species and critical habitats managed by USFWS, they concluded that the BSAI and GOA groundfish fisheries analyzed in that opinion are not likely to jeopardize the continued existence of threatened or endangered species or result in the destruction or adverse modification of critical habitat.

In 2022 NOAA Fisheries reinitiated Section 7 consultation to evaluate the effects of the GOA and BSAI groundfish fisheries on ESA-listed species and critical habitats under NMFS's jurisdiction. This reinitiation was not in response to any action under consideration by the Council; rather it was in response other triggers including new critical habitat designations (humpback whales, ringed and bearded seals); amount of authorized incidental take exceeded (Steller sea lion, sperm whale); and humpback whale population reclassification into distinct population segments. The action under consideration was the authorization of status quo fishery management measures under the GOA FMP and BSAI FMP. NMFS completed consultation on the GOA FMP first and is in the process of completing the BSAI FMP consultation. The Council requested NMFS allow the Council Chair and Executive Director to review the draft BSAI FMP Biological Opinion and provide comments to NMFS before it is finalized.

For the GOA, NMFS AKR completed a Biological Opinion and Conference Opinion on the effects of all groundfish fisheries managed under the GOA FMP, on species listed under the ESA and designated critical habitat, on December 23, 2024. NMFS AKR concluded that the GOA groundfish fisheries analyzed in that opinion are not likely to jeopardize the continued existence of any threatened or endangered species under NMFS's jurisdiction. It was also NMFS's conference opinion that the GOA groundfish fisheries are not likely to jeopardize the continued existence of the sunflower sea star proposed to be listed as threatened under the ESA. NMFS concurred that the GOA groundfish fisheries are not likely to adversely affect the other threatened and endangered species, as well as designated critical habitat, under the jurisdiction of NMFS.

Key points, accomplishments, and challenges

The Council continues to maintain measures for protected species and receives periodic informational updates from the NMFS AKR Protected Resources Division and USFWS. The Council has also taken additional steps to recognise the role of marine mammals and seabirds in the BSAI and GOA ecosystems. For example, the establishment of a forage fish category in the Groundfish FMPs (Objective 12) recognizes the importance of forage species as a critical food source for many marine mammal, seabird and fish species. Additionally, the ESRs presented annually to the Council include information on the status and population trends in seabird and marine mammal populations, which can provide insight into ecosystem productivity and changes.

Context for review of Goal 5 and objectives

Objectives 22-25 continue to be relevant and consistent with the Council's responsibilities, which are also reinforced by the the Vision Statement within the Council's Ecosystem Policy ("...support robust populations of marine species at all trophic levels, including marine mammals and seabirds"), and by

Objective 8 of the Bering Sea FEP ("Avoid and/or minimize impacts to seabirds, marine mammals, and protected species).

Council work aligned with Goal 5 and objectives

Objective 22

Continue to cooperate with the U.S. Fish and Wildlife Service (USFWS) to protect ESA-listed species, and if appropriate and practicable, other seabird species.

The Council supports Objective 22 through required and recommended seabird protections and through ongoing cooperation and coordination with USFWS, the Federal agency responsible for conservation and protection of seabirds through Federal programs relating to migratory birds and species listed under the Endangered Species Act. USFWS holds a non-voting seat on the Council and provides expertise on the conservation, protection, and enhancement of fish and wildlife and their habitats.

The Council receives information on seabird interactions through Annual Observer Reports, and a summary of seabird bycatch in the groundfish and halibut fisheries as well as information population trends is provided in ESRs. USFWS also conducts long-term monitoring of seabird populations and engages with industry and NMFS to develop strategies and technologies to reduce the incidental take of seabirds in groundfish fisheries.

Objective 23

Maintain or adjust current protection measures as appropriate to avoid jeopardy of extinction or adverse modification of critical habitat for ESA-listed Steller sea lions.

The Council supports Objective 23 through established, longstanding protections for Steller sea lions. The wording of this objective derives from Section 7(a)(2) of the ESA. Interactions between Steller sea lions and the BSAI and GOA groundfish fisheries have been a strong influence in groundfish management, particularly following a 2000 Biological Opinion determining that fisheries for walleye pollock, Pacific cod and Atka mackerel jeopardized the survival and recovery of Steller sea lions and adversely modified their critical habitat. Federal legislation (Public Law 106-554) allowed for a phase-in of protections while the Council developed an approach that would allow fisheries to operate in such a manner that would not jeopardize the continued existence of Steller sea lions and would prevent adverse modification of their critical habitat.

Current protections for Steller sea lions focus on reducing competition with commercial fishing for key prey species, including walleye pollock, Pacific cod, and Atka mackerel; and limiting disturbance near terrestrial habitats. Specific measures, first adopted with Amendment 70 to both FMPs and updated with various Amendments, include closed area buffers around Steller sea lion rookeries and haulouts, seasonal apportionment and limits on catch of prey species within Steller sea lion critical habitat, and vessel monitoring system (VMS) requirements. Additionally, the FMPs and implementing regulations specify that directed fishing of pollock, Pacific cod, and Atka mackerel is prohibited in the event that the spawning biomass of such a species is projected in the stock assessment to be at or below B20% in the coming year and the directed fishery remains closed until a subsequent stock assessment projects that the spawning biomass will exceed 20 percent of the projected unfished spawning biomass. This requirement was triggered in 2019 when the depressed status of GOA Pacific cod due to environmental conditions resulted in a closure of the directed fishery for 2020.

Objective 24

Encourage programs to review status of endangered or threatened marine mammal stocks and fishing interactions and develop fishery management measures as appropriate.

Objective 24 is similar to other research objectives in that it states the Council's support for using the best available science to understand the status of non-targeted and protected species, and appropriately manage the impacts the groundfish fisheries, but reflects that the Council does not have the ability to conduct or support research. This objective is strengthened by the requirement for the Council's conservation and management recommendations to be consistent with requirements of the ESA.

This objective is supported by periodic updates to the Council and SSC on the status of protected species, research, and current issues[54] and through the Council's research priorities.

Objective 25

Continue to cooperate with NMFS and USFWS to protect ESA-listed marine mammal species, and if appropriate and practicable, other marine mammal species.

Objective 25 addresses the Council's marine mammal protection responsibilities for species in addition to Steller sea lions (the focus of Objective 23). The wording of this objective reflects that marine mammals are protected under both the MMPA and the ESA. All marine mammals, regardless of whether they are ESA-listed or not, are protected under the MMPA which prohibits, with certain exceptions, the "take" of marine mammals, which means to harass, hunt, capture, or kill, or attempt to harass, hunt, capture, or kill any marine mammal. This objective refers to cooperation with both NMFS and USFWS because under the ESA and MMPA, jurisdiction is split between NMFS (whales, dolphins, seals and sea lions) and USFWS (sea otters, walruses).

ESA listing provides the strongest requirement for Council response but in support of Objective 25, the Council also cooperates with both agencies to consider interactions with non-ESA listed marine mammals. The MMPA and NMFS regulations require all commercial fisheries in the U.S. Exclusive Economic Zone to report the incidental mortality and injury of marine mammals that occur during their operations (16 U.S.C. 1387(e), 50 CFR 229.6). North Pacific observers, if deployed, also provide independent monitoring of incidental takes. Section 118 of the MMPA (as well as in regulations at 50 CFR 229.2) requires all commercial fisheries to be placed into one of three categories, based on the frequency of incidental mortality and serious injury relative to the value of potential biological removal (PBR) for each stock of marine mammal.

The Council also monitors and stays informed about other issues pertaining to interactions between groundfish fisheries and marine mammals. Recent issues include the following:

BSAI walrus: Walrus are currently protected through seasonal EEZ closures around important haulout areas including the Walrus Islands (Round Island and The Twins) and Cape Pierce. Council members acknowledged testimony received during staff tasking about walrus disturbance around Round Island, and Council members representing ADFG and USFWS noted their intent to gather information from their

[54] Examples of NMFS AKR Protected Resources Division updates include D6 February 2022 update to the SSC and B2 April 2025 update to the Council

agencies to assist subsistence users in the area to better understand the consistent declines in walrus populations in the area.[55]

Killer whales: The number of incidental takes of killer whales is higher than previous years; however, it is still below the annual level that would pose a risk to the long-term health for any of the three killer whale stocks found in the region where the incidental takes occurred. In 2024, Amendment 80 (A80) deepwater flats trawl fishers implemented a gear modification (i.e. "Whale Fence") to physically prevent killer whales from entering the net mouth. Additional measures to reduce waste and interactions due to depredation are addressed under Goal 4.

5.6 Goal 6: Reduce and Avoid Impacts to Habitat

Objectives

26. Review and evaluate efficacy of existing habitat protection measures for managed species.
27. Identify and designate essential fish habitat and habitat areas of particular concern pursuant to Magnuson-Stevens Act rules, and mitigate fishery impacts as necessary and practicable to continue the sustainability of managed species.
28. Develop a Marine Protected Area policy in coordination with national and state policies.
29. Encourage development of a research program to identify regional baseline habitat information and mapping, subject to funding and staff availability.
30. Develop goals, objectives and criteria to evaluate the efficacy and suitable design of marine protected areas and no-take marine reserves as tools to maintain abundance, diversity, and productivity. Implement marine protected areas if and where appropriate.

Discussion

Key points, accomplishments, and challenges

The Council took early and proactive habitat conservation measures that include "freezing the footprint" of nonpelagic trawl fishing in the Bering Sea, prohibiting bottom trawling in 95% of the Aleutian Islands management area, and implementing site-specific protections and gear restrictions in the Aleutian Islands and Gulf of Alaska.[56] The North Pacific region has some of the highest quality essential fish habitat (EFH) data available, and employs a sophisticated Fishing Effects model to evaluate the cumulative impacts of fishing activity on EFH.

Context for review of Goal 6 and objectives

Goal 6 and Objectives 26, 27, and 29 continue to align with the Council's responsibilities related to EFH as specified in the MSA and implementing regulations, described further below. Objectives 28 and 30 focus on the use of marine protected areas as a management strategy and reflect the time at which they were written.

[55] December 2025 Council newsletter

[56] Maps and tables of site specific measures are provided in the 2023 EH Review Final Summary Report. Pirtle, J. L., G. A., Harrington, M. Zaleski, C. Felkley, S. Gardiner, and J. T. Thorson. 2025. Essential Fish Habitat 5-year Review Final Summary Report: North Pacific 2023 Essential Fish Habitat 5-year Review. U.S. Dep. Commer., NOAA Tech. Memo. NMFS-F/AKR-31, 134 p. https://doi.org/10.25923/ve1v-ns96

While climate resilience is not explicitly included in Goal 6 and its associated objectives, the EFH 5-year review process provides an on-ramp for climate related information. For example, the species distribution models used in EFH 5-year reviews to update EFH descriptions and maps include the most recent survey and environmental data, ensuring EFH information reflects the current state of the ecosystems. In the upcoming 2028 EFH 5-year Review, Level 3 EFH information and maps will be updated for focal species with published temperature-dependent vital rates. NMFS will also demonstrate the use of new spatio-temporal species distribution models to describe and map how EFH may shift over time as hindcasts (EFH level 2 and 3).

Council work aligned with Goal 6 and objectives

Objective 26

Review and evaluate efficacy of existing habitat protection measures for managed species.

The process for EFH 5-year reviews, described under Objective 27, includes reviewing and updating EFH information and the required EFH components of FMPs, and revising or amending EFH provisions as warranted based on available information. This process does not explicitly call for reviewing and evaluating the effectiveness of existing habitat protection measures. The Council's use of the Fishing Effects model (described below) to periodically re-evaluate fishing impacts to EFH using updated information and with existing habitat protection measures in place, is one aspect of EFH 5-Year reviews that helps meet the intent of this objective indirectly and in the context of EFH.

The phrase "review and evaluate" in this objective may be more aspirational than practicable at this time. The Council can and has revisited the rationale for area-based management measures, such as those implemented to address gear interactions with the seafloor and unobserved crab mortality (see Section 5.4). However, there are challenges to quantitatively evaluating efficacy that would include defining efficacy and identifying appropriate metrics, and obtaining the necessary information (e.g., the ability to conduct a targeted research study; availability of level 4 EFH information on production rates by habitat).

Council staff recently participated in a cross-Council initiative that involved evaluating fishery area closures and other area-based conservation areas. In response to Executive Order 14008: Tackling the Climate Crisis at Home and Abroad, the CCC convened an Area-Based Management Subcommittee to assist with tracking and reacting to the 30 by 30 initiative and associated America the Beautiful efforts. The Subcommittee's work culminated in a 2023 report that includes an effectiveness checklist, through which Councils evaluated the effectiveness of conservation areas by considering qualitative factors such as research and monitoring, enforceability, and climate resilience.[57]

[57] Council Coordinating Committee Area-Based Management Subcommittee, 2023. An Evaluation of Conservation Areas in the U.S. EEZ. Final Report. Available at: https://www.fisherycouncils.org/area-based-management. Also see Bachman et al 2025. Use of conservation areas for fisheries management and ecosystem conservation in the U.S. exclusive economic zone. Marine Policy Volume 175, 2025. https://doi.org/10.1016/j.marpol.2025.106633.

Objective 27

Identify and designate essential fish habitat and habitat areas of particular concern pursuant to Magnuson-Stevens Act rules, and mitigate fishery impacts as necessary and practicable to continue the sustainability of managed species.

The wording of Objective 27 refers to the Council's habitat conservation responsibilities as described in the MSA and implementing regulations (50 CFR Part 600 Subpart J). The Council supports this objective through EFH 5-year reviews.

Identifying and designating EFH and HAPCs (ongoing/periodic)

The MSA defines EFH as "those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity" (16 USC 1802(10)). The Council is required to describe and identify EFH in FMPs, minimize adverse effects from fishing on EFH to the extent practicable, and identify other actions to encourage conservation and enhancement of EFH, among other requirements. The Council first identified and described EFH for its FMPs in 1998 (BSAI 55/GOA 55; later superseded by BSAI 65 and 78 and GOA 65 and 73; the subsequent amendments were based on an effects analysis in the 2005 EFH EIS).

The Councils and NMFS are required to review the EFH components of FMPs and revise or amend these based on available information at least every five years. These reviews provide periodic opportunities to update and incorporate the best available scientific information to identify and conserve EFH. The Council and NMFS recently initiated the next EFH review process, which will result in a final review document planned for 2028.[58] Previous reviews were completed in 2010, 2017, and 2023 and resulted in amendments to EFH information for both Groundfish FMPs (respectively, BSAI 98/GOA 90, BSAI 115/GOA 105, and BSAI 127/GOA 115).

As part of identifying EFH, the Council should (but is not required to) identify Habitat Areas of Particular Concern (HAPCs). HAPCs are a subset of EFH that are particularly important due to their ecological function and/or exposure to human-induced degradation. The designation of HAPC does not automatically confer additional protection, but they can help focus conservation and management efforts. The Council first identified several HAPCs and implemented gear restrictions in 2005, and in 2010 adopted a process for identifying site-specific HAPCs that is unique to the Alaska region and is described in the Groundfish FMPs.[59] The Council can initiate this process by setting priorities and issuing a request for HAPC proposals. In 2015, the Council designated six areas with high concentrations of skate egg cases as HAPCs (BSAI 104).

Mitigating Adverse Fishery Impacts (ongoing/periodic)

Councils are required to minimize to the extent practicable adverse effects from fishing on EFH.

EFH 5-year reviews are the process for updating the best available scientific information about potential adverse effects from fishing to EFH, and considering whether fishing activities adversely affect EFH in a manner that is more than minimal and not temporary in nature (§ 600.815(a)(2)(ii)).

[58] D2 EFH Review Plan December 2025; D2 Council motion
[59] See section 4.2.3.1 of both Groundfish FMPs

Since 2005, the Council has adopted several closure areas to conserve EFH, to minimize the effects of fishing on EFH, and specifically address concerns about the impacts of bottom trawling on benthic habitat (particularly on coral communities). Measures to mitigate adverse impacts of fishing on EFH were implemented following the 2005 EFH EIS. These actions included prohibiting bottom trawling in 95% of the Aleutian Islands management area, and closing six areas with especially high density coral and sponge habitat to all bottom contact fishing gear. In the Gulf of Alaska, the Council voted to prohibit bottom trawling for all groundfish species in 10 designated areas along the continental shelf. A later amendment "froze the footprint" of nonpelagic trawl fishing in the Bering Sea, closing a 133,000 square nautical mile area of the EBS. As part of the evaluation of EFH, the Council has adopted a number of mitigation measures in the fisheries to provide additional protection to EFH.[60]

Fishing impacts are now evaluated using a Fishing Effects (FE) model that develops a cumulative estimate of disturbance based on all fishing activity that impacts the seafloor. As part of this process, stock assessment authors contribute to evaluating whether impacts to EFH for their species are more than minimal and not temporary, and recommend whether mitigation measures are needed.[61] The FE model also provides an onramp to incorporate new information to better quantify and understand bottom contact by fishing gear, including Council-directed work to support pelagic trawl gear innovation.[62] The FE model was first developed for the 2017 EFH 5-year Review and updated for the 2023 EFH Review. It will be updated and rerun with additional years of fishing effort data for the upcoming 2028 EFH Review.

The Council has also supported Objective 27 through actions to protect habitat outside of the EFH 5-year review process. Amendments to both Groundfish FMPs (BSAI 94/GOA 89, 2009) instituted elevated trawl sweep modifications, requiring vessels in the flatfish nonpelagic trawl fisheries to use modified trawl gear in order to protect benthic habitat.

Recent issues and actions

Pelagic trawl gear definition (2025)

The Council took final action in 2025 to recommend updating the Federal regulatory definition of trawl gear. This will establish a clear, enforceable definition to monitor vessel compliance with gear and area closures in areas where the use of nonpelagic trawl gear is prohibited, and to ensure regulations reflect gear designs and innovations that are currently in use and that meet conservation and management goals. The Council simultaneously took steps to encourage gear innovations to address concerns that include the impacts of pelagic trawl gear to sensitive seafloor habitat and unobserved fishing mortality of crab (also see Section 5.4).

EFH consultations (ongoing)

The MSA requires Federal agencies to consult with NMFS when undertaking activities (for example, coastal development) that may adversely impact EFH, and enables Councils to comment on Federal or state agency actions that may adversely affect EFH. The NMFS Alaska Regional Office is responsible for engaging in EFH consultations and reports annually to the Council (usually in April) on the number and type of EFH early coordination and consultations. During the review period for this document (2022-2025), the agency engaged in approximately 115-130 early engagements and consultations

[60] Chapter 7 *in* 2023 EFH 5-year Review Final Summary Report https://doi.org/10.25923/ve1v-ns96
[61] 2022 Evaluation of Fishing Effects on Essential Fish Habitat https://doi.org/10.25923/c2gh-0w03
[62] C3b Council motion, June 2025

annually. In 2012, the Council adopted an EFH consultation policy with criteria to help NMFS identify issues that may be of particular interest to the Council.[63]

EFH amendments

The most recent EFH 5-Year Review was completed in 2023, and both Groundfish FMPs were amended to incorporate EFH information (BSAI 127/GOA 115, 2023).

Objective 28

Develop a Marine Protected Area policy in coordination with national and state policies.

The definition of Marine Protected Areas (MPAs), and state and Federal policy priorities related to MPAs, have changed since this objective was developed. During the review period the Council continued to be responsive to administration priorities regarding area-based management and protections.

The Council does not have its own Marine Protected Area policy. The focus of this objective on MPAs reflects the analytical approach to the 2004 PSEIS, which evaluated a set of example management policies ranging from less to more precautionary. The analysis considered how these management policies could be implemented, and the use of MPAs and no-take reserves was one example of a mechanism for habitat conservation under the more precautionary approaches analyzed. The use of MPAs was also included among the National Academy of Science's 1999 recommendations on Sustainable Fisheries Policy, cited in the Groundfish Management Approach. Objective 28 also reflects Federal administration and state policy priorities at the time, including Executive Order 13158[64] (2000), which directed Federal agencies to help strengthen and expand a national system of MPAs; and work by the Alaska Department of Fish and Game in 2001-2002 to develop a process for establishing MPAs in Alaska.[65]

As part of their work the CCC Area-Based Management Subcommittee (see Objective 26) considered the meaning of "marine protected area." This term has evolved and been more narrowly defined over time to focus on conservation of ecosystem services and cultural values, resulting in the exclusion of areas formerly considered by NMFS and the Councils as meeting the definition of an MPA under EO 13158 from consideration as MPAs by the NOAA MPA center. In response, the group developed its own definition of the term conservation area that is specific to marine fisheries management.[66]

Objective 29

Encourage development of a research program to identify regional baseline habitat information and mapping, subject to funding and staff availability.

While the Council does not directly conduct, staff, or fund habitat research, it is required to develop research priorities for areas of research that includes habitat and so does have opportunities to communicate its habitat research priorities. Habitat research specifically focused on EFH is conducted by NMFS AFSC and AKR scientists under the direction of an EFH Habitat Research Plan, which was most recently updated at the conclusion of the 2023 EFH review in preparation for the 2028 review.[67] NMFS

[63] See B2 NMFS EFH Report, April 2025; also April 2012 letter from NPFMC to NMFS AKR
[64] Executive Order 13158
[65] See archived ADFG page for more information
[66] Bachman et al 2025, https://doi.org/10.1016/j.marpol.2025.106633
[67] Pirtle, J. L., J. T. Thorson, S. R. Bayer, T. P. Hurst, M. E. Matta, and M. C. Siple. 2024. Alaska Essential Fish Habitat Research Plan: A Research Plan for the National Marine Fisheries Service's Alaska Fisheries Science Center

conducts an annual internal EFH Research Proposal Process to fund research that directly addresses priorities identified in the plan. NMFS scientists, SSC members, and the Council contribute to identifying EFH research recommendations as part of EFH 5-year reviews.

Objective 30

Develop goals, objectives and criteria to evaluate the efficacy and suitable design of marine protected areas and no-take marine reserves as tools to maintain abundance, diversity, and productivity. Implement marine protected areas if and where appropriate.

As described under Objective 28, use of the terms Marine Protected Area and no-take reserve in Objective 30 reflect the analytical approach used for the 2004 PSEIS, and were also more widely in use at the time these objectives were written. As also referenced above, the cross-Council CCC Area-Based Management Subcommittee recently adopted and defined the term "conservation areas" for describing area-based conservation measures used for fisheries management purposes.

The Council has practiced area-based management by establishing approximately 200 conservation areas for purposes that include conserving marine resources and biodiversity, protecting vulnerable habitats and ecosystems, and supporting healthy coastal communities.[68] Some of these are specifically intended to support the goal of reducing and avoiding impacts to habitat, and others are intended for other purposes that also support the objectives of maintaining abundance, diversity, and/or productivity, such as closures to directed fishing for prey species of Steller sea lions.

The Council does not have any guidance intended to systematically guide the use of area-based management measures, although every conservation area established in regulation includes a clear purpose and rationale.

5.7 Goal 7: Promote Equitable and Efficient Use of Fishery Resources

Objectives

31. Provide economic and community stability to harvesting and processing sectors through fair allocation of fishery resources.
32. Maintain the license limitation program, modified as necessary, and further decrease excess fishing capacity and overcapitalization by eliminating latent licenses and extending programs such as community or rights-based management to some or all groundfish fisheries.
33. Provide for adaptive management by periodically evaluating the effectiveness of rationalization programs and the allocation of access rights based on performance.
34. Develop management measures that, when practicable, consider the efficient use of fishery resources taking into account the interest of harvesters, processors, and communities.

and Alaska Regional Office. U.S. Dep. Commer., NOAA Tech. Memo. NMFS-F/AKR-33, 17 p. doi: 10.25923/sf79-ym32

[68] Bachman et al 2025

Discussion

Key points, accomplishments, and challenges

Goal 7 addresses allocation of and access to fishery resources, and is relevant to all of the Council's decisions and particularly the consideration, design, and ongoing management of LAPPs and other allocative decisions and programs. The Council's work since 2004 has addressed capacity and overcapitalization issues in the groundfish fisheries (Objective 32), including through the implementation of several LAPPs. The Council has also discussed ongoing and emerging challenges related to managing latent capacity and providing opportunities for new entrants.The Council and public have also identified allocation-related issues through staff tasking discussions and in the context of climate resilience planning (e.g. the 2024 Climate Scenarios Workshop); for example, related to fleet diversity, balancing the needs of user groups and fishing communities with different fishing portfolios, and the potential for increasing specialization to limit flexibility.

Context for review of Goal 7 and objectives

Objectives 31 and 34 echo the wording of National Standards 4 and 5 respectively, making these objectives durable over time. Objective 33 calls for evaluating the effectiveness of rationalization programs and allocation decisions, which is consistent with MSA requirements for LAPPs and additional policy and procedural guidance issued by NMFS since 2004.

Objective 32 is specific to the North Pacific and states the Council's intent to continue decreasing excess fishing capacity and overcapitalization, and to extend community or rights-based management programs. The Council could consider how conditions in the groundfish fisheries, and its interpretation of this objective, may have changed since this objective was adopted. For example, discussions at the Climate Scenarios Workshop highlighted that existing management programs can encourage specialization and create barriers to flexibility and diversification.

Council work aligned with Goal 7 and objectives

Objective 31

Provide economic and community stability to harvesting and processing sectors through fair allocation of fishery resources.

Many of the Council's management recommendations and ongoing practices involve establishing and managing allocations, and are therefore relevant to Objective 31. The National Standard 4 guidelines define allocation as the "direct and deliberate distribution of the opportunity to participate in a fishery among identifiable, discrete user groups or individuals" (50 CFR 600.325(c)(1)). The Council allocates resources through regulatory allocations of target species, including through LAPPs and allocations by sector and gear type. There are also management measures that may not meet the NS4 definition of allocation, but have incidental allocative impacts. This focus of this objective on stability highlights that allocation can be a strategy to support social and economic outcomes.

All of the Council's existing LAPP programs address stability in the harvesting and processing sectors. In some cases this is an explicit objective of the program (e.g., the Halibut and Sablefish IFQ program), and in others stability of the harvesting and processing sectors may be an implicit objective recognized in the Council's purpose and need statement. For example, the Council's purpose and need for reauthorizing (without sunset) the Central Gulf of Alaska Rockfish Program notes that fishery dependent communities

in the Central Gulf of Alaska and the onshore processing sector have benefited from a more stable workforce. Similarly, the purpose and need statements for allocation actions other than LAPPs, such as the BSAI and GOA Pacific cod allocations, note stability as an implicit objective.

The Council also implicitly supports the objective of stability through the design and ongoing management of groundfish management programs. For example, the BSAI American Fisheries Act pollock cooperative program, Amendment 80 cooperatives, and the Pacific Cod Trawl Cooperative Program include catch limit "sideboards" that limit the potential for these fleets to leverage the stability of their participation in rationalized fisheries to expand into other fisheries.

The focus of this objective on stability also reflects the intent of management strategies in place at the time of the 2004 PSEIS, including multiple actions establishing allocations to inshore and offshore components of the BSAI and GOA pollock fisheries, and allocations of Pacific cod among the various gear types to promote economic stability.

Issues and actions during the review period

Many Council actions are aligned with Objective 31, and the following actions during the review period directly support the objective of stability and/or evaluating allocations.

Allocation reviews (ongoing)

The Council periodically conducts allocation reviews in response to NMFS policy guidance, which includes consideration of whether allocations are fair and equitable; see Objective 33.

Pacific cod small boat access (2022)

The Council took final action in 2022 to improve BSAI small vessel access to Pacific cod by enabling small vessels, defined as less than or equal to 55' overall length, to access the historically underutilized BSAI jig sector allocation during the A-season. The Council's purpose and need statement noted that this action is intended to increase stability and opportunity for smaller vessels which do not have the same flexibilities as other, larger vessels (e.g., weather, travel distance).

Objective 32

Maintain the license limitation program, modified as necessary, and further decrease excess fishing capacity and overcapitalization by eliminating latent licenses and extending programs such as community or rights-based management to some or all groundfish fisheries.

Objective 32 (as well as 33) reflect the Council's recognition, at the time of the 2004 PSEIS, of the need to limit capacity and address overcapitalization in the groundfish fisheries, and state the Council's intent to do so through the implementation of additional LAPPs. This statement also appears in the Groundfish Management Policy Statement.

Issues and actions during the review period

Pot Cod LAPP (2025; no further action)

The Council considered but ultimately did not pursue the development of a cooperative-based LAPP for the BSAI pot catcher vessel ≥ 60 ft. (CV) and pot catcher/processor (CP) Pacific cod fisheries, in response

to industry concerns about increasing participation in the CV sector and potential for new participants in both sectors.[69]

History

The Council did not act to create any new LAPPs during the 2022-2025 review period. The most recent is the BSAI Pcod trawl catcher vessel LAPP, which was implemented in 2023 following final Council action in 2021 (BSAI 122). The Council's existing programs continue to support the objective of managing fleet capacity, and have been integral to the achievement of other objectives, including bycatch management. Existing programs and their implementation dates are as follows.

- Western Alaska Community Development Quota Program (1992)
- Halibut and Sablefish Individual Fishing Quota Program (1995)
- Bering Sea American Fisheries Act (AFA) Pollock Cooperatives (1999)
- Aleutian Islands Pollock (2005)
- Bering Sea and Aleutian Islands Groundfish (Non-Pollock) Cooperatives - Amendment 80 (2008)
- Central Gulf of Alaska Rockfish (2011)
- Pacific Cod Trawl Cooperative Program (2023)

The Council also considered development of a LAPP as one of the alternatives under a Gulf of Alaska Trawl Bycatch Management action, though postponed this action indefinitely in 2016.[70]

The Council first limited entry by adopting a moratorium on the entry of new vessels into the groundfish and Bering Sea crab fisheries (BSAI 23/GOA 28, 1994). The License Limitation Program (LLP) which limits the number, size and operations of vessels fishing crab and groundfish in the BSAI and GOA first went into effect in 2000 (BSAI 39/GOA 41, 1995).

Objective 33

Provide for adaptive management by periodically evaluating the effectiveness of rationalization programs and the allocation of access rights based on performance.

The Council supports Objective 33 through periodic LAPP reviews, allocation reviews, and CDQ program reviews.[71] The Council's commitment to periodic evaluation through Objective 33 is proactive in that it precedes and aligns with MSA requirements for all LAPPs to include provisions for regular monitoring and review, included in Section 303A - Limited Access Privilege Programs during the 2006 reauthorization of the Act (§303(A)(c)(G). Review processes are further detailed in a NMFS Procedural Directive.[72] Reviews are intended to evaluate a program's performance in meeting its goals and objectives. After reviewing the program's impacts, the Council may take any necessary and appropriate action to recommend to modify or end the program.

[69] D1 Council motion, October 2025
[70] C10 Council motion, December 2016
[71] Resources from LAPP and allocation reviews are available at https://www.npfmc.org/allocation-and-program-review/
[72] NMFS Procedure 01-121-01: Guidance for conducting review of catch share programs

In addition to MSA-required program reviews, in 2016 NMFS issued guidance to the Councils to ensure fisheries allocations are periodically evaluated.[73] Like program reviews, allocation reviews provide a mechanism for regular review and do not require the Council to make any changes as a result. The Council follows an approach for efficiently completing both LAPP and allocation reviews by combining these where appropriate.

Issues and actions during the review period

Program and allocation reviews

The Council completed multiple groundfish LAPP reviews that also serve as allocation reviews:

- American Fisheries Act (AFA) Bering Sea pollock fishery (2025)
- Central GOA Rockfish (2025)
- Halibut and Sablefish IFQ Program (2025)
- Amendment 80 (2024)

The Council may but is not required to further explore issues identified during the review. The Council is considering two issues identified during the Halibut and Sablefish IFQ review, IFQ/CQE transfer and beneficiary changes; and may determine in 2026 whether to initiate an analysis.[74] This review also prompted consideration of changes to the cost recovery process, described under Objective 34.

Non-LAPP allocation reviews completed during the review period include the following.

- BSAI Yellowfin Sole, Atka Mackerel, and Pacific Ocean Perch Allocation Review (2025)
- GOA Pacific Cod Sector Allocation Review (2023)

CDQ Program Review (2023)

The MSA provisions establishing the Western Alaska Community Development (CDQ) Program direct the State of Alaska to conduct a ten-year review evaluating the performance of each entity participating in the program, and determine whether each CDQ group has maintained or improved its overall performance with respect to criteria including economic development, financial performance, employment, and other community benefits. (MSA §305(i)(1)). The State of Alaska completed its most recent review in 2023 and determined that all six CDQ groups have maintained or improved their performance.[75]

Other examples of evaluation

The Council has adopted other practices that support Objective 34 by providing the Council and public with information on program performance, including bycatch avoidance (Goal 4). These include IFQ reports, which provide information on IFQ program activity and trends; and annual industry cooperative reports that are a resource for the Council to track the effectiveness of the cooperatives and their ability to

[73] NMFS 01-119 Fisheries Allocation Review Policy and associated procedural directives, 01-119-01 Criteria for Initiating Fisheries Allocation Reviews. Council Coordinating Committee Allocation Workgroup Guidance Document; and 01-119-02 Recommended Practices and Factors to Consider When Reviewing and Making Allocation Decisions
[74] D2 Council motion, October 2025
[75] B5 CDQ Decennial Review, April 2023

meet the Council's goals for the programs.[76] Cooperative reports also enable cooperatives to provide feedback on the programs to the Council.

Objective 34

Develop management measures that, when practicable, consider the efficient use of fishery resources taking into account the interest of harvesters, processors, and communities.

Objective 34 is worded similarly to National Standard 5: *Conservation and management measures shall, where practicable, consider efficiency in the utilization of fishery resources; except that no such measure shall have economic allocation as its sole purpose.* NS5 and Objective 34 both recognize the balance between efficiency and the attainment of other objectives including social and economic. The term "efficiency" in NS5 refers to contributing to the benefit of the nation with the least cost to society, including economic inputs such as capital, labor, and fuel (50 CFR 600.330(b)). All Council actions should be consistent with NS5 and thus support Objective 34. This objective also complements Objective 32, as one aspect of efficiency is managing access to avoid overcapitalization and excess capacity.

Issues and actions during the review period

Cost recovery (In progress)

The term "efficiency" in Objective 34 can also refer to efficient program administration. Section 303A(e) of the MSA authorizes NMFS to recover actual costs related to the management, data collection and analysis, and enforcement activities of LAPPs and the CDQ Program. NMFS provides annual reports on these costs. The Council considered opportunities for streamlining the cost recovery regulations and processes to reduce the administrative costs, thereby reducing costs for fishery participants; and identified opportunities to further improve clarity, consistency, and efficiency within cost recovery processes.

The Council is currently considering adjustments to the timing and administration of cost recovery programs, as well as opportunities to improve clarity, consistency, and efficiency; which could in turn reduce costs for fishery participants. NMFS AKR made adjustments to improve transparency of the December 2025 cost recovery report. The Council directed NMFS and NOAA Office of Law Enforcement (OLE) to cease charging travel, rent, lease, and utility costs that are not incremental costs associated with a LAPP, and requested additional detail to be included in future cost recovery reports. The Council further requested that NMFS initiate a package of cost recovery program changes for future consideration.[77]

EO deregulatory measures (2025)

In response to Executive Order (EO) 14276, Restoring American Seafood Competitiveness, the Council identified and submitted to the Secretary a list of recommended actions and a workplan to reduce burdens on domestic fishing and to increase production within sustainable fisheries, including actions that stabilize markets, improve access, enhance economic profitability, and prevent closures. These outcomes are consistent with the intent of Objective 34. The workplan identified actions that are already under consideration, those for which the Council has already taken final action and which at the time were

[76] B10 Action memo, April 2025 provides an overview of cooperative reports by sector
[77] D1 Council motion, April 2025

awaiting NMFS rulemaking; as well as a series of new actions related to recordkeeping and reporting, monitoring, and streamlining of regulations.[78]

CGOA Rockfish Program adjustments (2022)

This action revised the Central Gulf of Alaska Rockfish Program with changes to increase flexibility and efficiency, improve functionality, and better ensure the total allowable catch for the primary rockfish species is fully harvested and landed in Kodiak as intended (GOA 113, 2022). The Council's purpose and need notes unforeseen changes in the fishery, including Covid 19, impacts to the GOA flatfish market due to the continuing foreign trade tariffs, and the loss of several shorebased processing facilities in Kodiak, that resulted in difficulties processing all the trawl CV rockfish quota.

Additional Council actions related to the efficient use of fishery resources include adjustments to maximum retainable amounts (MRAs) and release of small sablefish, both addressed in Section 5.4.

[78] Workplan and letter to the Assistant Administrator, September 16 2025

5.8 Goal 8: Increase Alaska Native Consultation

Objectives
35. Continue to incorporate local and traditional knowledge in fishery management.
36. Consider ways to enhance collection of local and traditional knowledge from communities, and incorporate such knowledge in fishery management where appropriate.
37. Increase Alaska Native participation and consultation in fishery management.

Discussion

Key points, accomplishments, and challenges

The Groundfish FMPs acknowledge LKTK as a component of best available scientific information, consistent with National Standard 2 guidelines and the Council's Ecosystem Policy. The Council's adoption of the Local Knowledge, Traditional Knowledge, and Subsistence (LKTKS) Protocol in 2023 is a milestone that formalizes guidance on identifying, analyzing, and incorporating LKTKS into the Council process for the Bering Sea region.[79]

During and prior to the review period, the Council made process improvements to support Tribal and rural engagement and participation, particularly through improved remote accessibility. The Community Engagement Committee, LKTKS Taskforce, Climate Scenarios Workshop, and Climate Change Task Force involved the public in identifying further opportunities for participation and representation in the Council process, and these ideas can continue to inform the Council's work.

The Council does not engage in formal government-to-government consultations, which are the responsibility of NMFS AKR. During the review period, NMFS took additional steps to support Tribal consultation and engagement, and coordinate with the Council on its Tribal outreach efforts.

Context for review of Goal 8 and objectives

There are multiple points the Council may want to consider in reviewing Goal 8 and objectives 35-37.

Definition of consultation: The term "consultation" has a specific legal meaning that is different from how this term is used in Goal 8 and Objective 37, and the Council could consider whether to continue using this term in the Management Policy. NMFS AKR is responsible for carrying out formal government-to-government consultations with Federally recognized Tribes on Federal policies that have Tribal implications. The 2004 PSEIS used the term consultation more loosely to include the identification and use of LK and TK, Alaska Native representation on the Council and Advisory Panel, addressing issues related to Alaska Natives during NEPA compliance, and allowing for subsistence harvest of fish and wildlife.[80] The Council also previously used the term "consultation" to refer to issue-specific and ongoing outreach and engagement.

References to LKTK in other Council policy guidance: The Council could also consider how Objectives 35 and 36 align with other cross-FMP guidance related to LKTKS including the LKTKS Protocol and Statement, the Council's Ecosystem Policy, and the BSFEP goals and objectives. For example, the BSFEP also includes Process Objective 6 of facilitating and organizing communication of ecosystem science, LK,

[79] D2 LKTKS Protocol, April 2023; D1 Council motion, October 2023
[80] 2004 PSEIS Section 4.10.2.8

TK, and relevant Council policy between scientists, communities, and decision makers. The FEP also refers to subsistence, non-consumptive, and cultural values, and includes an objective of supporting sustainable opportunities and community resilience for subsistence users and Alaska Native communities (Ecosystem Goal 4 and associated objectives).

Climate resilience: While Goal 8 and objectives do not refer to climate change or resilience, other documents including the LKTKS Protocol and the Climate Scenarios Workshop Report do highlight current and potential climate change impacts on Alaska Native and subsistence resource users, and the role of LKTK in identifying and contextualizing change. Objective 2 of the Council's IRA funding for climate resilience is to continue work to incorporate Local Knowledge and Traditional Knowledge.

Alignment of Goal 8 with objectives: The wording of Goal 8 focuses specifically on Alaska Native consultation and participation in the Council management process. However, some Council work tracked under Goal 8 is also relevant to other groups and individuals that participate in the Council process. The Council could consider whether there is a different way of structuring these goals and objectives to recognize LKTKS and public engagement as priorities that are not nested under a goal specifically focused on Alaska Native participation. In particular:

- Local knowledge: LK refers to knowledge formed based on personal and/or shared experience. It is not inherently Indigenous knowledge or TK, and can be held by non-Indigenous people.
- Public engagement: The Council's work to improve meeting accessibility (e.g., through streaming meetings and enabling remote testimony) is meant to facilitate participation by all members of the public.
- Rural communities: The Council has at times focused on improving outreach to rural communities, which can include though are not limited to Alaska Native communities.

Council work aligned with Goal 8

Objectives 35 and 36

These objectives are typically tracked together in Groundfish Workplan Updates.

Continue to incorporate local and traditional knowledge in fishery management.

Consider ways to enhance collection of local and traditional knowledge from communities, and incorporate such knowledge in fishery management where appropriate.

Recent issues and actions

The Council supported both of these objectives during the review period by adopting the Local Knowledge, Traditional Knowledge, and Subsistence Information (LKTKS) Protocol, and a Policy Statement summarizing the approach in the Protocol. The LKTKS Protocol defines these knowledge systems and includes guidance for how to appropriately identify, analyze, and incorporate LK, TK, and subsistence information into the Council's decision-making process. The Protocol was developed by the LKTKS Taskforce, a Council advisory body convened from 2019-2023 as an Action Module under the BSFEP, and with input from LK and TK knowledge holders. The Protocol is specific to the Bering Sea region, though it could be used more widely as the information within is relevant to Council and agency staff, Council advisory bodies, and the public.

The Taskforce also identified onramp recommendations for potential changes to the Council's process to better incorporate LKTKS knowledge systems.[81] The Council expressed support for these onramps, understanding additional capacity and resources may be necessary for full implementation of specific onramps in the future. The Council also implemented work on several onramp recommendations including ongoing development of the LKTKS search engine, continued support for two-way dialogue and engagement between the Council and Tribes and communities as well as Tribal Consultations led by NMFS occurring early and often, new materials to support analytical staff, and changes to the Council's public comment procedures to allow testifiers to provide introductions without it counting against their allowed time limit for oral public comments at the Council, SSC, and Advisory Panel (AP) meetings.

The Council has also supported Objectives 35 and 36 through development of the draft EIS for the Bering Sea Chum Salmon Bycatch Action. Staff incorporated LK, TK, the social science of LK and TK, and subsistence information into this analysis, and worked with Tribal cooperating agencies to co-produce some sections of the document. This work can help to inform practices for future analyses.

Earlier Council documents including the 2004 PSEIS and the Bering Sea FEP describe attributes of LK and TK, but do not define them to the extent accomplished by the Protocol.

Objective 37

Increase Alaska Native participation and consultation in fishery management.

As described above the term "consultation" refers to NMFS Alaska Region's responsibility for engaging in formal government-to-government consultations. This section addresses the actions taken jointly and individually by NMFS and the Council that support formal consultations as well as other forms of engagement.

Council and NMFS coordination (ongoing)

The Council and NMFS have a shared goal of supporting Tribal participation in the Council process, and understanding the outcomes of Tribal Consultations as early in the process as possible and preferably prior to Council final action on issues.[82] The Council does not routinely participate in Tribal Consultations though Council staff and a non-quorum of Council members may attend when invited.

During the review period NMFS has taken additional steps to support Tribal Consultation and engagement, and coordinate with the Council on its Tribal outreach efforts. In addition to its consultation responsibilities NMFS supports informal engagement through issue-specific listening and informational meetings, most recently for the Programmatic Evaluation (Section 5.10) and the Bering Sea chum salmon bycatch action (Section 5.4). NMFS AKR began publishing a Tribal newsletter in 2022, and beginning in 2024 held regular engagement sessions prior to Council meetings. NMFS provides written reports on Tribal consultation and engagement under B agenda items at Council meetings.

Tribal representation on the Council and Council advisory bodies

Increasing Tribal representation on Council bodies has been suggested by the public and by the Community Engagement Committee (CEC; currently on pause) as a way to improve representation of Alaska Native perspectives and priorities, as well as by the LKTKS Taskforce as a way to facilitate TK

[81] D2 LKTKS Onramp Recommendations, April 2023
[82] D1 Council motion on Community Engagement Committee Recommendations, February 2021

holders. The Council modified its Statement of Organization, Practices, and Procedures in 2022 to include a designated Alaska Native Tribal seat on the AP, noting that this designated seat in no way limits the number of Alaska Natives that may serve as members of the AP. The Council encourages and in some cases has established dedicated seats for Alaska Native representation on other bodies including the CEC, LKTKS Task Force, and Salmon Bycatch Committee (convened by the Council in 2022-2023). The Council's 2025 call for SSC nominations noted that while not a requirement, the Council values candidates who have experience working with Alaska coastal communities and/or with scientific expertise with LKTK.[83]

As a related issue, members of the public have also requested the Council's membership include a designated Tribal voting seat. While the Council's membership has at times included Alaska Native representation, the Council does not have the authority to make changes to Council membership to require a designated Tribal voting seat because Council membership is established by the MSA (Section 302(a)(1)(G), (b)).

Council committees

At two separate points since 2004, the Council convened ad hoc committees tasked with improving engagement with Alaska Native and rural communities. The committees discussed similar topics including improving two-way communication, addressing both issue-specific and ongoing outreach needs, the use of technology to improve access to the Council process, and the tradeoffs involved in dedicating more staff time and resources to this work. Both committees' work documented past and current Council outreach practices.

- Rural Outreach Committee (2009-2011): The ROC developed an outreach protocol that was implemented by Council staff for several projects, primarily concerning salmon bycatch in Bering Sea fisheries.
- Community Engagement Committee (CEC) (met 2019-2021; currently paused): The Council reconstituted a Community Engagement Committee, with new membership and tasking in response to public support for increasing the Council's engagement with rural and Alaska Native communities. The Council recognized that it was undertaking new, "programmatic" initiatives including the Bering Sea FEP, that may not have specific actions or alternatives for which the Council's traditional outreach plan is designed. The CEC produced a final report and the Council recommended actions implementing some of the report's recommendations.[84]

Rural community and Tribal liaison position

Since 2021, the Council has supported staff being assigned tasking related to rural community and Tribal issues. The staff member assigned with "rural and Tribal liaison" responsibilities serves as a first point of contact, provides outreach on Council action, and helps facilitate participation in the Council process.

Remote accessibility and meeting practices

The Council has made changes to its meeting practices over time that have improved accessibility by rural and Alaska Native communities. The Council first began audio streaming of meetings in 2009. Beginning with the Covid pandemic in 2020 the Council began streaming and allowing for remote testimony during virtual meetings, and continued streaming allowing remote and in-person testimony for all meetings

[83] NPFMC Call for Nominations for 2025 Advisory Panel and SSC Membership
[84] D1 Community Engagement Committee Report, February 2021; D1 Council motion, February 2021

(Council, AP, and SSC) as the Council resumed hybrid virtual/in-person meetings. These changes were adopted as the Council resumed fully in-person meetings in April 2022. The Council also adopted changes to its public comment procedures to allow testifiers to provide introductions without it counting against their allowed time limit for oral public comments at Council, SSC, and AP meetings.

Issue-specific engagement and outreach

The Council has supplemented the public Council process with issue-specific outreach as part of the development of some Council actions. For example, in conjunction with the 2026 Bering Sea chum salmon bycatch action, Council staff attended several meetings of Regional Advisory Councils of the U.S. Department of Agriculture and U.S. Department of Interior's Federal Subsistence Board. The Council also supported direct outreach to Alaska Native communities for 2011 and 2015 salmon bycatch actions, including through direct mailings, teleconferences, attendance and staff presentations at RAC and other organizational meetings, and rural outreach visits.

5.9 Goal 9: Improve Data Quality, Monitoring, and Enforcement

Objectives

38. Increase the utility of groundfish fishery observer data for the conservation and management of living marine resources.
39. Develop funding mechanisms that achieve equitable costs to the industry for implementation of the North Pacific Groundfish Observer Program.
40. Improve community and regional economic impact costs and benefits through increased data reporting requirements.
41. Increase the quality of monitoring and enforcement data through improved technology.
42. Encourage a coordinated, long-term ecosystem monitoring program to collect baseline information and compile existing information from a variety of ongoing research initiatives, subject to funding and staff availability.
43. Cooperate with research institutions such as the North Pacific Research Board in identifying research needs to address pressing fishery issues.
44. Promote enhanced enforceability.
45. Continue to cooperate and coordinate management and enforcement programs with the Alaska Board of Fish, Alaska Department of Fish and Game, and Alaska Fish and Wildlife Protection, the U.S. Coast Guard, NMFS Enforcement, International Pacific Halibut Commission, Federal agencies, and other organizations to meet conservation requirements; promote economically healthy and sustainable fisheries and fishing communities; and maximize efficiencies in management and enforcement programs through continued consultation, coordination, and cooperation.

Discussion

Key points, accomplishments, and challenges

Timely, high quality catch accounting and monitoring data are fundamental to effective groundfish management programs. Cumulative improvements over time, including milestones such as the restructuring of the North Pacific Observer Program and the implementation of electronic monitoring (EM) as a tool, have supported the Council's ability to develop innovative management strategies and support other goals and objectives related to sustainability, bycatch management, and efficient use of fishery resources. Timely, high-quality data are also critical for adapting to changing ecosystem and fishery conditions and implementing responsive, climate-informed management tools.

Goal 9 and objectives also reflect that the Council invests in maintaining partnerships with a network of agencies (Federal and State) and other organizations to help communicate research needs and meet its conservation and management goals.

Context for review of Goal 9 and objectives

The Council continues to support Goal 9 and its associated objectives, which are stated as long-term aspirations and opportunities for continuous improvement. One aspect of continuous improvement is balancing the costs and benefits of data improvements. Objective 40 calls for *increased* economic data reporting requirements, though the Council's actions during the review period emphasized the need to weigh industry cost and burden relative to data utility, and ultimately maintained or reduced economic data reporting requirements.

Council work aligned with Goal 9 and objectives

Objectives 38 and 39

These objectives are typically tracked together in Groundfish Workplan Updates.

Increase the utility of groundfish fishery observer data for the conservation and management of living marine resources.

Develop funding mechanisms that achieve equitable costs to the industry for implementation of the North Pacific Groundfish Observer Program.

North Pacific Observer Program (Observer Program) data are used for multiple purposes including stock assessment, monitoring groundfish quotas, monitoring the bycatch of groundfish and non-groundfish species, assessing the effects of the groundfish fishery on other living marine resources and their habitat, and assessing methods intended to improve the conservation and management of groundfish and other living marine resources. Increasing the utility of this data, as in Objective 38, can refer to enhancing the ability of Observer Program data to meet these needs, while balancing other considerations such as timeliness, cost, logistical feasibility, and use of technology.

The Council directly addressed Objective 39 through the restructuring of the Observer Program (BSAI 86/GOA 76, implemented in 2013). This action changed how observer coverage is funded and the observer coverage requirements for processors and vessels, in order to achieve enhanced observer coverage and a more equitable distribution of costs to the industry. During the review period, and on an ongoing basis, the Council and NMFS support Objectives 38 and 39 in the following ways.

Observer Annual Deployment Plans (ADPs) and Annual Reports (ongoing)

NMFS develops ADPs to outline how observers and EM will be deployed for the upcoming calendar year, and prepares Annual Reports that evaluate the performance of the prior year's ADP implementation. This iterative process provides flexibility in the deployment of monitoring resources. The Annual Report is presented to the Council in June each year and informs the Council and the public about how well various aspects of the program are working. The review highlights areas where improvements are recommended to: 1) collect the data necessary to manage the groundfish and halibut fisheries; 2) maintain the scientific goal of unbiased data collection and; 3) accomplish the most effective and efficient use of the funds collected through the observer fees. A draft ADP for the upcoming year is prepared in October each year and a final ADP is completed in December.

Council advisory bodies (ongoing)

The Council maintains two advisory bodies tasked with providing recommendations related to groundfish monitoring requirements. The Fishery Monitoring Advisory Committee (FMAC) provides the Council with recommendations on issues or regulatory actions related to both full and partial observer coverage groundfish fisheries, and reviews and provides input on the North Pacific Observer Program Annual Report. The Partial Coverage Fishery Monitoring Advisory Committee (PCFMAC) advises the Council on matters related to partial coverage groundfish fisheries.

Cost efficiencies (ongoing during review period)

In 2019, the Council approved an increase to the observer fee from 1.25 to 1.65%, and identified cost efficiency as its highest priority for work on the partial coverage observer program.[85] In response to this direction, NMFS developed a Partial Observer Coverage Cost Efficiencies Analysis conducted in 2022-2023 that was integrated with the draft 2024 ADP. This analysis was intended to evaluate deployment designs to more efficiently spend observer fee revenues such that greater coverage and/or improved monitoring is achieved using both observers and EM. The Council expressed support for implementing the 2024 ADP.

Objective 40

Improve community and regional economic impact costs and benefits through increased data reporting requirements.

Objective 40 is supported by ongoing and periodic informational reports provided by NMFS to the Council, including Economic SAFE reports, which present the economic status of groundfish fisheries off Alaska in terms of economic activity and outputs; Annual Community Engagement and Participation Overview (ACEPO) reports; and the ongoing development of Ecosystem and Socioeconomic Profiles (see Section 5.3).

Economic Data Reporting (EDR)

Objective 40 calls for improving the ability to assess community and regional economic impact costs and benefits through *increasing* data reporting requirements. The Council recently recommended *removing* economic data reporting requirements from three groundfish fishery sectors.[86] Council members commented that EDR data generated limited and nuanced utility in informing management decisions, relative to their costs.

The Council originally implemented three EDR programs in the groundfish fisheries: the BSAI American Fisheries Act pollock fishery and the BSAI Amendment 80 fisheries, and GOA groundfish trawl catcher vessels and processors in fisheries not yet managed under a catch share program fishery. EDR programs were designed to gather data and information to improve the Council's ability to analyze the social and economic effects of the catch share or rationalization programs, to understand the economic performance of participants in these programs, and to help estimate impacts of bycatch avoidance efforts. Each program was designed around a more specific set of goals and collected different data elements.

Ultimately the Council's recommendation to remove EDR reporting requirements cited the limited utility of EDR data, cost savings for industry by reducing the reporting burden, reduction in associated cost recovery fees, and consistency with Executive Orders 14276 and 14192 addressing deregulation and burden to industry.

[85] C2 Council motion, October 2019
[86] C6 Council motion, October 2025 recommends removing EDR requirements for the AFA and Amendment 80 fleets, and the earlier C1 Council motion, February 2022 recommends removing EDR requirements for the GOA groundfish trawl fleet.

Crew data and universal data collection components (2024; no further action)

In 2022 and 2023 the Council reviewed staff discussion papers that aimed to identify economic data components, including crew data, that are not currently collected across all sectors and could support analytical documents if collected consistently. The Council considered developing a crew data collection program that would collect information on crew licenses/residency, crew compensation, and number of crew positions to support economic and community impact analyses required for Council actions and program reviews. The Council took no further action on this issue, noting concerns about a lack of secure funding to implement the data collection and the potential for additional costs.[87]

Objective 41

Increase the quality of monitoring and enforcement data through improved technology.

Since 2004 there have been transformative changes in technology to support timely, accurate, and precise catch accounting and monitoring. These changes include widespread adoption of Vessel Monitoring Systems (VMS), electronic reporting (ER), and electronic monitoring (EM), collectively referred to as electronic technologies (ET); along with the capacity to transmit, compile, and analyze data. All of these tools support the Council's ability to develop effective strategies for managing the groundfish fisheries and achieving other Groundfish FMP goals and objectives, particularly those related to bycatch and efficient use of fishery resources.

The design and implementation of monitoring programs, collection of monitoring and enforcement data, and quality assurance are responsibilities of the NMFS Alaska Region and NOAA OLE. The Council also plays an important role through actions and policy recommendations to ensure the Council and NMFS have high quality, timely, and cost-effective data to support management and scientific information needs. These actions include adopting monitoring program goals and objectives, supporting the testing and integration of new technology through collaboration with the industry and NMFS, and recommendations authorizing the use of new technology.

A history of implementing electronic technologies in North Pacific fisheries (through 2021) is documented in the Alaska Region Electronic Technologies Implementation Plan.[88] This section highlights the types of Council actions that support Objective 41.

Implementation of electronic monitoring (ongoing)

EM is used as a tool in the North Pacific for estimating catch and discards, and verifying compliance with regulations (e.g., catch sorting, weighing, and retention). The most recent Council initiative to advance EM was the Council's 2022 final action to implement an EM program for compliance monitoring of pelagic trawl pollock catcher vessels and tender vessels delivering to shoreside processors and stationary floating processors in the BSAI and GOA (BSAI 126/GOA 114). This program operated under an EFP 2020-2024. NMFS and the Council are currently discussing next steps for the development and implementation of EM in the GOA Rockfish Program.

A major earlier milestone in EM implementation was the Council's recommendation to integrate EM into the North Pacific Observer Program, specifically authorizing EM as a tool for catch estimation in the GOA and BSAI fixed gear groundfish and halibut fisheries (BSAI 114/GOA 104, 2016). The Council and

[87] C5 Council motion, October 2024
[88] NMFS Alaska Region Electronic Technologies Implementation Plan, 2021

NMFS consider how to optimize observer and EM deployment for fisheries in the partial coverage category each year, based on an analysis of costs, budget, fishing effort, and monitoring needs.

Collaboration, innovation, and phased implementation

The testing and uptake of new technology moves forward through collaboration between the Council, NMFS, and industry partners. As described in the most recent ET Implementation Plan, this typically involves a phased approach starting with a proof-of-concept, moving through pilot projects, testing, and different stages of implementation before the program reaches maturity and is implemented through regulation. Applications for the use of Exempted Fishing Permits (EFPs) and financial support from non-government programs have been critical to field testing and developing new programs. The Council does not approve EFPs or funding awards but is able to receive updates and express its support, and NMFS regulations require that the Regional Administrator consult with the Council on EFP applications if the Regional Administrator determines an EFP application warrants further consideration (§ 679.6).

In February 2024 the Council reviewed and supported an eLogbooks EFP application submitted to NMFS that would exempt fishermen from the regulations that require fishing vessels to produce printed copies of electronic logbooks, in order to facilitate the transition using electronic logbooks that are fully-integrated with modern technology.

Council advisory bodies

The Council has convened and tasked an evolving group of advisory bodies that have played an instrumental role in advancing ET and supporting Objective 41. The Council established an EM Workgroup in 2013 that was initially tasked with developing an EM program on fixed gear catcher vessels for integration into the Observer Program. As the fixed gear EM program moved into implementation, the Council reconstituted the workgroup as the Trawl EM Committee and refocused its work on developing EM as a tool for meeting monitoring objectives on trawl catcher vessels in the BS and GOA pelagic pollock fisheries.

Objectives 42 and 43

These objectives are typically tracked together in Groundfish Workplan Updates.

Encourage a coordinated, long-term ecosystem monitoring program to collect baseline information and compile existing information from a variety of ongoing research initiatives, subject to funding and staff availability.

Cooperate with research institutions such as the North Pacific Research Board in identifying research needs to address pressing fishery issues.

The Council does not fund or conduct research, but can communicate information needs as well as research priorities consistent with the Magnuson Stevens Act (16 U.S.C. 302(h)(7)), including the following ways:

- Workshops: The Council has held workshops as a forum for identifying information needs, including the February 2023 SSC workshop and report[89] and June 2024 Climate Scenarios Workshop and report.[90]
- AFSC updates: NMFS AFSC periodically provides updates to the Council and SSC on the agency's resources, capacity, and priorities, as well as more detailed updates on specific initiatives including survey modernization and prioritization.
- Letters and comments: The Council occasionally submits comments on national initiatives, and has sent letters emphasizing the importance of ongoing fishery and ecosystem surveys for supporting conservation and management.[91]
- ESRs and Council presentations.

The Council also supports Objectives 43 and 44 through its process for setting research priorities, as required by the MSA. Since 2018 the Council has completed this on a triennial basis. The purpose is to communicate these information needs to the Secretary of Commerce and NMFS AFSC for their consideration in developing research priorities and budgets for the region; and also to communicate priorities to other research and funding entities. The Council approved the most recent set of research priorities in June 2024.[92] The Council and SSC recently adjusted the research priorities process to provide more transparency and opportunities for public input including early in the process.

Objective 43 highlights the Council's relationship with the North Pacific Research Board (NPRB), a Congressionally authorized program that is able to recommend marine research to the Secretary of Commerce to be funded through a competitive grant program. NRPB is an important audience for the Council's research priorities. The Council participates in the NPRB process through membership on the Board of Directors and staff participation on the Science Panel, and NPRB provides occasional updates to the Council.

Objective 44

Promote enhanced enforceability

On an ongoing basis, the Council supports enforceability of groundfish management programs through the work of the Enforcement Committee, whose membership includes representation from the USCG, NOAA OLE, and the State of Alaska. This body is tasked with reviewing proposed plans, regulations, or other management actions and providing their assessment of enforcement issues as early as possible in the development process; as well as advising on monitoring and compliance approaches and consideration of measures that could affect safety at sea.

The Council maintains as a resource a document developed by NOAA Fisheries OLE, USCG, and State of Alaska that outlines law enforcement considerations as a resource for Council and NMFS staff involved in analysis and rulemaking.[93]

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[89] SSC February 2023 Final Workshop Report: Rapid change in the northern Bering and southern Chukchi Seas - Identifying ecosystem responses and effects on the management of Federal fisheries
[90] Climate Scenarios Workshop Report. NPFMC. October 2024
[91] Including May 2025 Letter to the Secretary; June 2024 letter to the NMFS Assistant Administrator
[92] D5 Council motion, June 2024
[93] Enforcement Considerations For NOAA Fisheries and North Pacific Fishery Management Council. Developed by NOAA Fisheries Enforcement, U.S. Coast Guard, and State of Alaska. December 2015

The Council considers enforceability in all of its management program recommendations. Promoting enforceability was a primary consideration of several Council recommendations during the review period, including actions intended to provide operational flexibility, including Council action on Maximum Retainable Amounts (Section 5.4) and the pelagic trawl gear definition (Section 5.6).

Objective 45

Continue to cooperate and coordinate management and enforcement programs with the Alaska Board of Fish, Alaska Department of Fish and Game, and Alaska Fish and Wildlife Protection, the U.S. Coast Guard, NMFS Enforcement, International Pacific Halibut Commission, Federal agencies, and other organizations to meet conservation requirements; promote economically healthy and sustainable fisheries and fishing communities; and maximize efficiencies in management and enforcement programs through continued consultation, coordination, and cooperation.

The Council maintains a long history of cooperative management with all involved agencies and entities. The Council recognizes and works to achieve the shared goals of its many partners in stewardship of Alaska's fisheries and its supporting ecosystems. The Council receives regularly scheduled updates from several agencies and programs, including ADFG, NMFS OLE, and USCG, as part of Council meeting B reports, and occasional updates from others. The Council also has established a Joint Protocol[94] with the Board of Fisheries establishing a mechanism to achieve cooperative, compatible management systems for fisheries resources in State and Federal waters. Besides those partners listed in Objective 45, the Council maintains effective working relationships with international, national, and Alaska organizations.

5.10 Climate Resilience

This section is structured differently than other sections of the review document, as the Groundfish FMPs currently do not include any goals or objectives that explicitly address climate change. The Council's climate resilience planning and work have primarily been tracked under Goal 1 focusing on biological sustainability, and Goal 3 focusing on ecosystem-based fisheries management. This section summarizes the Council's climate resilience planning in one place to provide a comprehensive and cumulative overview of this work, and enable the Council to consider whether existing policy guidance aligns with the Council's climate resilience priorities. The role of climate resilience with regard to the Groundfish Management Policy is also discussed in Section 3.3.

Discussion

Key points, accomplishments, and challenges

Climate resilience was a significant focus of the Council's work during and in the years leading up to the review period due to factors that include the following:

- Climate-related changes and shocks to North Pacific ecosystems and managed species, including the decline of GOA Pacific cod, the crash of EBS snow crab, and recruitment variability of sablefish
- Council discussions, including through the Climate Scenarios Workshop, that have considered climate adaptation challenges and strategies

[94] The Joint Protocol agreement between the Council and the Alaska Board of Fisheries was last revised in December 2009.

- Public awareness and concern about the impacts of climate change on fisheries and communities, including subsistence users
- New climate-informed information products, tools, and modeling capabilities being developed at NMFS AFSC through the Alaska Climate Integrated Modeling Project (ACLIM) and Gulf of Alaska counterpart (GOACLIM), and the NOAA Changing Ecosystems and Fisheries Initiative (CEFI)
- National and cross-Council discussions through the Council Coordination Committee and the Scientific Coordination Subcommittee (SCS) including the 8th National Scientific Coordination Subcommittee meeting (SCS8) that focused on applying ABC control rules in a changing environment.
- Funding provided to the regional fishery management councils under the IRA to support climate resilience.

In response to the issues and initiatives described below, the Council's accomplishments include addressing climate resilience as a systemic need throughout the Council process, engaging in strategic, cross-FMP discussion to identify where climate resilience planning can be impactful and actionable, and shifting from idea-generating and planning toward concrete steps for integrating climate science and considerations into management processes. Ongoing challenges include limitations to capacity and resources, responding to administration priorities, and balancing climate resilience planning with other Council priorities and planning needs. Another challenge of planning for climate resilience, highlighted by the Climate Scenarios Workshop, is considering the range of approaches climate adaptation could entail, from ongoing, incremental adjustments to existing programs to more transformative changes.

Context for discussion of goals and objectives

The Groundfish FMPs do not include goals and objectives for climate resilience. The Council's Ecosystem Policy and Bering Sea FEP goals and objectives do refer to climate change and resilience both explicitly and implicitly, for example by referring to ecosystem tipping points (BSFEP Ecosystem Objective 15; see Appendix 1). The 2004 PSEIS does include discussion of climate change impacts to groundfish species and marine ecosystems, and since then Council analytical documents and other EISs have continued to evaluate the impacts of the specific action and alternatives in the context of current ecosystem conditions and climate change. Section 3.3 provides a detailed discussion of information and questions the Council could consider regarding the climate resilience of the Groundfish Management Policy.

Council work aligned with climate resilience

Completed initiatives

Climate Change Task Force and recommendations (2024)

The Council initiated a Climate Action Module under the BSFEP with the goal of facilitating the Council's work toward climate-ready fisheries management in the region. To support this work the Council convened the Climate Change Task Force (CCTF) to develop and execute a work plan. The CCTF produced two resources to help guide the Council's climate resilience planning:

- The Climate Readiness Synthesis (2022) assessed the climate readiness of the management process focusing on 1) the management system, 2) SAFE reports and products including ESRs; and 3) knowledge bases that support climate readiness and adaptation, focusing on indigenous

community, industry, and NMFS and Council knowledge bases. The report provided recommendations for improvements in each area.[95]

- The CCTF Final Report (2024) provided the group's final recommendations. One recommendation was for the Council to develop and implement a climate change workplan to increase resilience in fisheries management by more effectively incorporating climate related information and tools into decision making, which led to the Council adopting the Climate Resilience workplan described below.[96]

Climate Scenarios Workshop (2024)

In June 2024 the Council held a public two-day Climate Scenarios Workshop to generate ideas for short- and long-term management approaches to improve climate resiliency of Federally managed fisheries. The meeting included over 200 in-person and virtual participants in an exploration of hypothetical future climate scenarios, and generated a wide range of ideas related to Council processes, management tools, and integrating climate science.[97]

Ongoing initiatives

Inflation Reduction Act (IRA) Climate Resilience funding

The Council applied for and received $2.6 million in funding from NMFS to support climate resilience planning, through a funding opportunity made available to the regional fishery management councils under the IRA. The Council's direction is for this funding to build on and accelerate existing initiatives by focusing on three objectives:

1. Develop a climate-resilient management policy
2. Continue work to incorporate local and traditional knowledge
3. Strengthen the consideration of uncertainty and risk in harvest specifications

IRA funding supports staff and contractor time to support climate resilience initiatives during the funding period.

Climate Resilient Management Policies

Developing a climate-resilient management policy corresponds to Objective 1 of the Council's IRA funding priorities. This objective was originally intended to be achieved through the Programmatic Evaluation initiated by the Council in 2023, which would have revisited the management policies, goals, and objectives for all of the Council's Federally managed fisheries. The Council invested significant planning and discussion in this work, and ultimately recommended taking no further action in response to public testimony and concerns about capacity and the scope of this action.[98] The Council reinstituted the triennial process of reviewing Groundfish FMP objectives, as addressed by this review document, which provides another pathway for considering the climate resilience of Council policy guidance.

[95] Climate Readiness Synthesis. Prepared by the NPFMC Climate Change Task Force, 2022
[96] Climate Change Task Force Final Report. Prepared by the NPFMC Climate Change Task Force. November 2024
[97] Climate Scenarios Workshop Report, October 2024
[98] D4 Council motion October 2025

Climate Resilience Workplan

The Council established a Climate Resilience Workplan implementing some of the CCTF's recommendations, focusing on near-term opportunities to integrate existing and emergent climate information into management.[99] The Workplan identifies onramps for products of the Changing Ecosystems and Fisheries Initiative (CEFI) and provides a strategy for bridging climate science and the Council process. One priority of this workplan is to review tier systems, consider climate-informed biomass targets and limits and climate-robust or forecast-informed harvest control rules, as described below.

Harvest Specifications Adjustments

The Council is considering adjustments that could improve utilization of climate science and enhance climate resilience in the groundfish and crab harvest specifications. There are multiple potential points for integrating climate informed advice, including through assessments; harvest control rules, which provide predetermined rules for determining OFL and ABC based on stock status and information availability; and TAC setting. The Council's work at this time is focusing primarily on harvest control rules for ABC setting. Council staff are co-leading collaborative work with NMFS AFSC scientists to examine whether alternative ABC harvest control rules could perform better than the status quo under changing ecosystem conditions. This work has been discussed by the SSC (including at a June 2025 workshop) and the Groundfish Plan Teams, and at the June 2026 meeting the Council will review a discussion document and provide direction on next steps, which could include developing a purpose and need statement and alternatives for analysis.

Ecosystem Committee

In 2025, the Council reconstituted its Ecosystem Committee with new terms of reference and membership, and tasked this group with providing advice related to ecosystem-based fisheries management and climate resilience planning.

[99] D1 Council motion December 2024

Appendix 1: Council Policy Guidance

Groundfish Management Policy

Excerpted from Fishery Management Plan for the Groundfish of the Bering Sea and Aleutian Islands Management Area and the Fishery Management Plan for the Groundfish Fisheries of the Gulf of Alaska

Note: The BSAI Groundfish FMP includes an additional objective under Goal 4: Manage incidental catch and reduce bycatch and waste - Objective 22: Continue to improve the retention of groundfish where practicable, through establishment of minimum groundfish retention standards. The Council recommended adding this objective in 2005 through BSAI Amendment 79. Consistent numbering of objectives between the two FMPs is used in this review document for ease of reference.

Management Approach

The Council's policy is to apply judicious and responsible fisheries management practices, based on sound scientific research and analysis, proactively rather than reactively, to ensure the

sustainability of fishery resources and associated ecosystems for the benefit of future, as well as current generations. The productivity of the North Pacific ecosystem is acknowledged to be among the highest in the world. For the past 25 years, the Council management approach has incorporated forward looking conservation measures that address differing levels of uncertainty. This management approach has in recent years been labeled the precautionary approach. Recognizing that potential changes in productivity may be caused by fluctuations in natural oceanographic conditions, fisheries, and other, non-fishing activities, the Council intends to continue to take appropriate measures to insure the continued sustainability of the managed species. It will carry out this objective by considering reasonable, adaptive management measures, as described in the Magnuson-Stevens Act and in conformance with the National Standards, the Endangered Species Act, the National Environmental Policy Act, and other applicable law. This management approach takes into account the National Academy of Science's recommendations on Sustainable Fisheries Policy.

As part of its policy, the Council intends to consider and adopt, as appropriate, measures that

accelerate the Council's precautionary, adaptive management approach through community-based or rights-based management, ecosystem-based management principles that protect managed species from overfishing, and where appropriate and practicable, increase habitat protection and bycatch constraints. All management measures will be based on the best scientific information available. Given this intent, the fishery management goal is to provide sound conservation of the living marine resources; provide socially and economically viable fisheries for the well-being of fishing communities; minimize human-caused threats to protected species; maintain a healthy marine resource habitat; and incorporate ecosystem-based considerations into management decisions.

This management approach recognizes the need to balance many competing uses of marine resources and different social and economic goals for sustainable fishery management, including protection of the long-term health of the resource and the optimization of yield. This policy will use and improve upon the Council's existing open and transparent process of public involvement in decision-making.

Objectives

Adaptive management requires regular and periodic review. Objectives identified in this policy statement will be reviewed annually by the Council. The Council will also review, modify, eliminate, or consider new issues, as appropriate, to best carry out the goals and objectives of this management policy.

To meet the goals of this overall management approach, the Council and National Marine Fisheries Service (NMFS) will use the Alaska Groundfish Fisheries Programmatic Supplemental Environmental Impact Statement (NMFS 2004) as a planning document. To help focus consideration of potential management measures, the Council and NMFS will use the following objectives as guideposts, to be re-evaluated, as amendments to the FMP are considered over the life of the analysis.

Goal 1: Prevent Overfishing

1. Adopt conservative harvest levels for multi-species and single species fisheries and specify optimum yield.
2. Continue to use the existing optimum yield cap for the GOA groundfish fisheries.
3. Provide for adaptive management by continuing to specify optimum yield as a range.
4. Provide for periodic reviews of the adequacy of F40 and adopt improvements, as appropriate.
5. Continue to improve the management of species through species categories.

Goal 2: Promote Sustainable Fisheries and Communities

6. Promote conservation while providing for optimum yield in terms of the greatest overall benefit to the nation with particular reference to food production, and sustainable opportunities for recreational, subsistence, and commercial fishing participants and fishing communities.
7. Promote management measures that, while meeting conservation objectives, are also designed to avoid significant disruption of existing social and economic structures.
8. Promote fair and equitable allocation of identified available resources in a manner such that no particular sector, group or entity acquires an excessive share of the privileges.
9. Promote increased safety at sea.

Goal 3: Preserve Food Web

10. Develop indices of ecosystem health as targets for management.
11. Improve the procedure to adjust acceptable biological catch levels as necessary to account for uncertainty and ecosystem factors.
12. Continue to protect the integrity of the food web through limits on harvest of forage species.
13. Incorporate ecosystem-based considerations into fishery management decisions, as appropriate.

Goal 4: Manage Incidental Catch and Reduce Bycatch and Waste

14. Continue and improve current incidental catch and bycatch management program.
15. Develop incentive programs for bycatch reduction including the development of mechanisms to facilitate the formation of bycatch pools, vessel bycatch allowances, or other bycatch incentive systems.
16. Encourage research programs to evaluate current population estimates for non-target species with a view to setting appropriate bycatch limits, as information becomes available.
17. Continue program to reduce discards by developing management measures that encourage the use of gear and fishing techniques that reduce bycatch which includes economic discards.
18. Continue to manage incidental catch and bycatch through seasonal distribution of total allowable catch and geographical gear restrictions.

19. Continue to account for bycatch mortality in total allowable catch accounting and improve the accuracy of mortality assessments for target, prohibited species catch, and non-commercial species.
20. Control the bycatch of prohibited species through prohibited species catch limits or other appropriate measures.
21. Reduce waste to biologically and socially acceptable levels.

Goal 5: Avoid Impacts to Seabirds and Marine Mammals

22. Continue to cooperate with the U.S. Fish and Wildlife Service (USFWS) to protect ESA-listed species, and if appropriate and practicable, other seabird species.
23. Maintain or adjust current protection measures as appropriate to avoid jeopardy of extinction or adverse modification of critical habitat for ESA-listed Steller sea lions.
24. Encourage programs to review status of endangered or threatened marine mammal stocks and fishing interactions and develop fishery management measures as appropriate.
25. Continue to cooperate with NMFS and USFWS to protect ESA-listed marine mammal species, and if appropriate and practicable, other marine mammal species.

Goal 6: Reduce and Avoid Impacts to Habitat

26. Review and evaluate efficacy of existing habitat protection measures for managed species.
27. Identify and designate essential fish habitat and habitat areas of particular concern pursuant to Magnuson-Stevens Act rules, and mitigate fishery impacts as necessary and practicable to continue the sustainability of managed species.
28. Develop a Marine Protected Area policy in coordination with national and state policies.
29. Encourage development of a research program to identify regional baseline habitat information and mapping, subject to funding and staff availability.
30. Develop goals, objectives and criteria to evaluate the efficacy and suitable design of marine protected areas and no-take marine reserves as tools to maintain abundance, diversity, and productivity. Implement marine protected areas if and where appropriate.

Goal 7: Promote Equitable and Efficient Use of Fishery Resources

31. Provide economic and community stability to harvesting and processing sectors through fair allocation of fishery resources.
32. Maintain the license limitation program, modified as necessary, and further decrease excess fishing capacity and overcapitalization by eliminating latent licensees and extending programs such as community or rights-based management to some or all groundfish fisheries.
33. Provide for adaptive management by periodically evaluating the effectiveness of rationalization programs and the allocation of access rights based on performance.
34. Develop management measures that, when practicable, consider the efficient use of fishery resources taking into account the interest of harvesters, processors, and communities.

Goal 8: Increase Alaska Native Consultation

35. Continue to incorporate local and traditional knowledge in fishery management.
36. Consider ways to enhance collection of local and traditional knowledge from communities, and incorporate such knowledge in fishery management where appropriate.
37. Increase Alaska Native participation and consultation in fishery management.

Goal 9: Improve Data Quality, Monitoring and Enforcement

38. Increase the utility of groundfish fishery observer data for the conservation and management of living marine resources.
39. Develop funding mechanisms that achieve equitable costs to the industry for implementation of the North Pacific Groundfish Observer Program.
40. Improve community and regional economic impact costs and benefits through increased data reporting requirements.
41. Increase the quality of monitoring and enforcement data through improved technology.
42. Encourage a coordinated, long-term ecosystem monitoring program to collect baseline information and compile existing information from a variety of ongoing research initiatives, subject to funding and staff availability.
43. Cooperate with research institutions such as the North Pacific Research Board in identifying research needs to address pressing fishery issues.
44. Promote enhanced enforceability.
45. Continue to cooperate and coordinate management and enforcement programs with the Alaska Board of Fish, Alaska Department of Fish and Game, and Alaska Fish and Wildlife Protection, the U.S. Coast Guard, NMFS Enforcement, International Pacific Halibut Commission, Federal agencies, and other organizations to meet conservation requirements; promote economically healthy and sustainable fisheries and fishing communities; and maximize efficiencies in management and enforcement programs through continued consultation, coordination, and cooperation.

Ecosystem Policy

In February 2014, the Council adopted an Ecosystem Policy that shall be given effect through all of the Council's work, including long‑term planning initiatives, fishery management actions, and science planning to support ecosystem‑based fishery management. The Ecosystem Policy includes three parts: a Value Statement, a Vision Statement, and an Implementation Strategy.

Value Statement – The Gulf of Alaska, Bering Sea, and the Aleutian Islands are some of the most biologically productive and unique marine ecosystems in the world, supporting globally significant populations of marine mammals, seabirds, fish, and shellfish. This region produces over half the nation's seafood and supports robust fishing communities, recreational fisheries, and a subsistence way of life. The Arctic ecosystem is a dynamic environment that is experiencing an unprecedented rate of loss of sea ice and other effects of climate change, resulting in elevated levels of risk and uncertainty. The North Pacific Fishery Management Council has an important stewardship responsibility for these resources, their productivity, and their sustainability for future generations.

Vision Statement – The Council envisions sustainable fisheries that provide benefits for harvesters, processors, recreational and subsistence users, and fishing communities, which (1) are maintained by healthy, productive, biodiverse, resilient marine ecosystems that support a range of services; (2) support robust populations of marine species at all trophic levels, including marine mammals and seabirds; and (3) are managed using a precautionary, transparent, and inclusive process that allows for analyses of tradeoffs, accounts for changing conditions, and mitigates threats.

Implementation Strategy – The Council intends that fishery management explicitly take into account environmental variability and uncertainty, changes and trends in climate and oceanographic conditions, fluctuations in productivity for managed species, and associated ecosystem components, such as habitats and non-managed species, and relationships between marine species. Implementation will be responsive to changes in the ecosystem, and our understanding of those dynamics, incorporate the best available science, including local and traditional knowledge, and engage scientists, managers, and the public.

Bering Sea Fishery Ecosystem Plan Goals and Objectives

Excerpted from the Bering Sea Fishery Ecosystem Plan

Ecosystem Goals

1. Maintain, rebuild, and restore fish stocks at levels sufficient to protect, maintain, and restore food web structure and function;
2. Protect, restore, and maintain the ecological processes, trophic levels, diversity, and overall productive capacity of the system;
3. Conserve habitats for fish and other wildlife;
4. Provide for subsistence, commercial, recreational, and non-consumptive uses of the marine environment;
5. Avoid irreversible or long-term adverse effects on fishery resources and the marine environment;
6. Provide a legacy of healthy ecosystems for future generations.

Process Objectives

The following Process Objectives provide the Council's objectives for implementing the Alaska-wide ecosystem goals specifically for the Bering Sea ecosystem area, through the BS FEP.

1. Create and implement a cohesive process for Bering Sea EBFM, using the Council's ecosystem vision statement, which provides a mechanism for incorporating new sources of ecosystem information into Council processes, and defines the Council's management process to improve understanding by the broader public.
2. Create a transparent process to track the Council's progress towards achieving its six ecosystem goals.
3. Maintain and improve upon the open and public process for the Council to identify ecosystem objectives and management responses, including engaging with communities that are in the Bering Sea ecosystem or users of the ecosystem.
4. Develop discrete research objectives and associated Action Modules to identify and address research and information needs.
5. Improve incorporation of local knowledge (LK) and traditional knowledge (TK) in Council management for the Bering Sea ecosystem
6. Facilitate and organize communication of ecosystem science, LK, TK, and relevant Council policy between scientists, communities, and decision makers
7. Provide a framework that would identify and prioritize research and information needs across disciplines
8. Synthesize and update current scientific understandings of Bering Sea ecosystem processes and status, including fisheries and subsistence use, to inform fishery management.
9. Maintain and enhance systematic status and trend monitoring of Bering Sea ecosystem processes and status relative to ecosystem objectives to detect change.
10. Create and track performance metrics to evaluate the ecosystem effects of specific management actions.
11. Track how BS FEP information is used in Council process
12. Establish a process to use ecosystem information to inform decisions for adaptive management, including to address changing circumstances under novel or intensified stressors.
13. Provide a framework for considering management strategies and associated opportunities, risks, tradeoffs, and cumulative effects affecting Council-managed species and the broader Bering Sea

ecosystem, with consideration for ecological, economic, social, and cultural factors of fishery harvest.

14. Periodically review and refine the content of the Core BS FEP, including specification of process, ecosystem, and research objectives.

Research Objectives

The Research Objectives provide the bridge between the Process Objectives and Action Modules to be initiated under the BS FEP framework. Every Research Objective is related to at least one of the Process Objectives. Additionally, each Research Objective has two equally important parts: the research question, and the avenue for that information feeding into the management process.

1. Evaluate and develop resiliency for the Council's management strategies in the Bering Sea, and investigate options for responding to changing environmental and climatic circumstances such as changes to fish distribution and abundance, shipping patterns, etc.
    - *Links to Process Objective 14*
2. Develop processes to guide the use of subsistence data, local knowledge (LK), and traditional knowledge (TK) information from the Bering Sea in the Council process.
    - *Links to Process Objective 6*
3. Assess Council management in the Bering Sea with respect to ecosystem-based fishery management best practices and identify areas of success and gaps indicating areas for improvement, on a regular basis.
    - *Links to Process Objective 1*
4. Identify and develop interdisciplinary conceptual model(s) of the connected Bering Sea ecosystem components to respond to specific management questions.
    - *Links to Process Objective 7*
5. Develop methods to track whether Council Bering Sea research priorities are effectively articulated to partner research agencies, and how funded research is eventually used in the Council process.
    - *Links to Process Objective 8*

Ecosystem Objectives

For fishery management to more explicitly take into account and be responsive to changes in the ecosystem, each of the six overarching Ecosystem Goals are associated with one or more strategic Ecosystem Objectives.

Ecosystem Goal 1: Maintain, rebuild, and restore fish stocks at levels sufficient to protect, maintain, and restore food web structure and function

1. Maintain target biomass levels for target species, consistent with optimum yield, using available tools.
2. Maintain healthy populations and function of non-target and forage species.
3. Adjust fishing-related mortality from the system to be sustainable and commensurate with total productivity and continue to limit optimum yield to 2 million metric tons for the BSAI groundfish fisheries.

Ecosystem Goal 2: Protect, restore, and maintain the ecological processes, trophic levels, diversity, and overall productive capacity of the system

4. Maintain key predator/prey relationships.

5. Conserve structure and function of ecosystem components.

Ecosystem Goal 3: Conserve habitats for fish and other wildlife

6. Minimize adverse impacts to essential fish habitat, to the extent practicable.
7. Avoid and/or minimize impacts to ecologically-sensitive habitat, including habitat areas of particular concern (HAPCs).
8. Avoid and/or minimize impacts to seabirds, marine mammals, and protected species.

Ecosystem Goal 4: Provide for subsistence, commercial, recreational, and non-consumptive uses of the marine environment

9. Support benefits in the Bering Sea fishery and fishery-related industries.
10. Provide opportunities for new entrants in Federal fisheries.
11. Promote economic and community stability to all commercial harvesting and processing sectors.
12. Support sustainable opportunities and community resilience for subsistence users and Alaska Native communities.
13. Provide for directed fisheries including subsistence fisheries by minimizing bycatch mortality.
14. Preserve the ability for stakeholders to derive non-consumptive and cultural value from the Bering Sea ecosystem.

Ecosystem Goal 5: Avoid irreversible or long-term adverse effects on fishery resources and the marine environment

Ecosystem Goal 6: Provide a legacy of healthy ecosystems for future generations

Combined objectives for goals 5 and 6:

15. Establish appropriate thresholds to minimize risk of crossing ecosystem tipping points caused by fishery or other human activity.
16. Encourage responsible parties to minimize adverse impacts to fish and other wildlife associated with changes in shipping activity, tourism, energy, and other types of development.
17. Ensure that fishery management is sufficiently adaptive to account for the effects of climate change or other ecosystem changes, including loss of sea ice and ocean acidification.