

Bycatch Utilization Subcommittee
Report to
Bycatch Advisory Council
April 16, 2024

Purpose: The Bycatch Utilization Subcommittee was formed based on the following recommendation from the Alaska Bycatch Review Task Force:

“The State of Alaska should support taking incremental measures through the regulatory process to improve bycatch utilization with a particular focus on species that are otherwise marketable but are caught with non-targeted gear, or discards in a directed fishery that are required by regulation.” The purpose was to identify issues which would need to be addressed when considering utilization of bycatch that could not be avoided. Bycatch is defined as *“fish which are harvested in a fishery, but are not sold or kept.”*

Subcommittee membership: Brian Gabriel (chair), Duncan Fields and Chelsae Radell.

Meeting information: The subcommittee met four times between November 20, 2023 and March 12, 2024. Public testimony was taken at each meeting. Attendance ranged from 15-50 individuals. Bycatch Advisory Council members were represented at each meeting and ADF&G Deputy Commissioner Rachel Baker attended three of the four meetings.

Presentations:

- a. Jim Harmon with SeaShare; a voluntary, Federally-permitted Prohibited Species Donation program that accepts bycatch seafood donations to distribute to communities and food banks.
- b. Deputy Commissioner Rachel Baker provided an overview of Gulf of Alaska bycatch regulations.
- c. Chelsae Radell presented a processor perspective on challenges facing the processing sector in dealing with bycatch.

Public Comment:

Following is a brief summary of major points provided by the public at the four meetings.

- There is a need to minimize bycatch before moving forward with a utilization program.
- It is important not to incentivize bycatch. Utilization of bycatch could hinder efforts to reduce bycatch and could create more problems.
- Bycatch utilization can work if infrastructure is set up and there is individual accountability with adequate monitoring.
- Processor capacity limitations pose a challenge with a lot of the non-target product that cannot be processed going to the fishmeal plants.
- All fisheries have bycatch and there may be different answers for different species.
- Significant problems with fish too small to be processed pose a challenge.
- If bycatch is allowed to be retained and sold, proceeds should go to research, observer coverage or other fishery benefit.

- Concerns expressed about impact to markets, with small fish and potential quality issues.

Subcommittee Focus:

- a) The subcommittee agreed to initially discuss more full utilization of the high value species of salmon, halibut and crab.
- b) Addressing the federal fisheries in the Gulf of Alaska would be a starting point.
- c) Halibut bycatch was suggested to be a point of discussion.

Subcommittee Findings:

A number of issues that would need to be addressed were identified by the subcommittee. These included regulatory, economic, logistical, and political issues.

Regulatory:

- Retention and remuneration regulations for all species begins at the North Pacific Fishery Management Council.
- Halibut bycatch retention and sale by authorized gear governed by International Pacific Halibut Commission.
- How bycatch proceeds are utilized, such as for research and/or management needs.
- Need to differentiate between regulatory and prohibited species bycatch.
- Bycatch retention could result in higher mortality and caps as well as discard protocols that would need to be revisited.

Economic:

- Processing issues
 - a) Plant configuration and needs for infrastructure and/or technology improvements to process certain products. Global market and tariff issues that create economic distress compound the issue since processors are not able to make as many infrastructure improvements beyond what is necessary.
 - b) Undersized fish may be difficult to process.
 - c) Work force availability and cost.
 - d) Processing small quantities of bycatch species creates inefficiencies and increases costs for processors.
 - e) Subsidies may be needed to address additional costs.
- Harvesting issues
 - a) Quality challenges based on viability of multi-species retained on board.
 - b) Would require processor/harvester partnership and coordination
 - c) Catcher and catcher/processor vessels have limited holding capacity.
- Market issues
 - a) Small fish taken as bycatch entering the market could reduce the value of the directed fishery products.

- b) Additional availability of some species, crab for example, may expand domestic markets.
- c) Required bycatch retention may result in some poorer quality product.
- d) Entire seafood industry is struggling now and instituting a bycatch utilization requirement could be cost prohibitive.

Logistical:

- Transportation challenges for distribution of product.
- Supply chain issues.
- Distribution partner limitations on holding product.

Political:

- Public resistance to allow/require retention and utilization of prohibited species before further reduction measures are implemented.
- Concerns about incentivizing or institutionalizing bycatch.

Report Conclusions:

The issue of increasing utilization of bycatch was discussed at four subcommittee meetings, with hours of public testimony.

While some of the public testimony expressed a position on bycatch in general, most of those providing comment attempted to speak to the specific issue of bycatch utilization. The general public consensus was to express concern about legitimizing or incentivizing prohibited species bycatch, such as salmon, halibut and crab. Several members of the public expressed specific opposition to moving forward with a proposal to allow or require retention of halibut by trawl vessels with the creation of a system to pay for that halibut.

Some testimony was received supporting the general concept of full utilization and ideas were suggested which spoke to regulatory or economic discards, rather than prohibited species.

During the presentations, public comment and subcommittee discussions, it became apparent to the members and the public that the issue of bycatch utilization is complicated and there are many issues to consider. A mandatory rather than a voluntary program would need to have a full economic analysis which would address the issues listed above, along with others which might be identified. There was strong public opposition to moving forward with a bycatch utilization program for prohibited species.

Subcommittee members did not reach a consensus regarding the development of a specific proposal to allow or require the retention and sale of halibut bycatch by trawl vessels.