



Gulf of Mexico Fishery Management Council

Forage Fish

The Gulf of Mexico Fishery Management Council (Council) thinks that Regional Management Councils should have the authority to determine which species should be considered and managed as forage fish. Under existing Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) provisions, some Councils already recognize the importance of forage fish to larger ecosystem functions and those species are regulated under the Council's Fishery Management Plans (FMPs) where appropriate. Councils should retain the authority to determine species requiring conservation and management through development of FMPs. Further, resources are limited in the NOAA Southeast Region. For example, the Southeast Fisheries Science Center (SEFSC) and the states do not currently have enough resources to survey and assess target stocks, let alone prepare stocks assessments for forage species that would be needed to set science-based annual catch limits.

Provisions that would require Councils to specify catch limits for forage fish species to account for the diet needs of marine mammals, birds, and other marine life would greatly impact the ability of Councils to fulfill their responsibilities under the Magnuson-Stevens Act. Many predators are opportunistic feeders and shift their prey based on abundance and availability. As a result, determining the exact amount of individual prey needed each year would be an enormous undertaking, rife with uncertainty, and would divert limited funding away from other critical research such as surveys and stock assessments.

Timing of Amendment Development and Implementation

The Gulf Council meets five times each year on an approximately bi-monthly schedule. The dates and locations of upcoming meetings are posted well in advance on the Gulf Council website (<http://gulfcouncil.org/meetings/council/>). Since 2016, the Gulf Council has formally tracked the number of Council meetings between initiation and final action for each fishery issue, and the number of days between transmittal to the Secretary of Commerce and final implementation (i.e., rulemaking). In general, it takes an average of four Council meetings to complete Regulatory/Framework Actions and seven to nine Council meetings to complete Plan Amendments. This difference between management changes made by Framework Action versus Plan Amendment often comes down to the complexity and contentiousness of the proposed action(s). After the Council takes final action on proposed management changes, the document is transmitted to the Secretary of Commerce via the National Marine Fisheries Service (NMFS), where and when NMFS conducts its own public comment period and formal rulemaking process. Surprisingly in 2016, rulemaking took longer for Framework Actions than it did for Plan

Amendments (average: 245 days versus 214 days, respectively). In 2017, Framework Actions took one-third less time to complete rulemaking than Plan Amendments (average: 217 days versus 293 days, respectively) and in 2018, Framework Actions took half as long as Plan Amendments (average: 130 days versus 278 days, respectively).

Climate Change

The Council, along with the Southeast Regional Office (SERO) and the SEFSC of the National Marine Fisheries Service, actively incorporate considerations of climate change in amendments to FMPs and stock assessments. The Council and SERO incorporate climate change considerations into the Description of the Biological Environment, and in the evaluation of Environmental Consequences, in Council plan and Framework Amendments. The SEFSC and the Council solicit and include (as appropriate) research on fish stock range expansion or shifting, fish stock abundance, and other environmental variables in SEDAR stock assessments for Gulf species. Further, the Council and the SEFSC are working jointly on the development of climate vulnerability plans to further inform future management decisions.