DNV

WHEN TRUST MATTERS

SURVEILLANCE NO. 2

RESPONSIBLE FISHERIES MANAGEMENT CERTIFICATION SCHEME, VERSION 2.1

Alaska pollock

Certification Body	DNV Business Assurance USA
Assessment team	Jodi Bostrom, Giuseppe Scarcella, Paul Knapman
Fishery client	At-sea Processors Association
Date	June 26, 2025

Certified Seafood International

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ABBREVIATIONS AND ACRONYMS

ABC	Acceptable biological catch
ADFG	Alaska Department of Fish and Game
AFDF	Alaska Fisheries Development Foundation
AFSC	Alaska Fisheries Science Center
AI	Aleutian Islands
AKSC	Alaska Seafood Cooperative
APA	At-sea Processors Association
B20%	20% of the equilibrium SSB in the absence of fishing
BMSY	Biomass corresponding to the maximum sustainable yield (biological reference point); the peak value on a domed yield-per-recruit curve
BOF	Board of Fisheries
BS	Bering Sea
BSAI	Bering Sea and Aleutian Islands
CDQ	Community development quota
CITES	Convention on International Trade in Endangered Species
EBFM	Ecosystem-based fisheries management
EBS	Eastern Bering Sea
EEZ	Exclusive economic zone
EFH	Essential fish habitat
EIS	Environmental Impact Statement
EM	Electronic monitoring
ESA	Endangered Species Act
ETP	Endangered, threatened, and protected (species)
FAO	Food and Agriculture Organization of the United Nations
FMSY	Fishing mortality corresponding to the maximum sustainable yield
GOA	Gulf of Alaska
IUCN	International Union for the Conservation of Nature
MSC	Marine Stewardship Council
MSY	Maximum sustainable yield
mt	Metric tons
nm	Nautical mile
NMFS	National Marine Fisheries Service (NOAA Fisheries)
NOAA	National Oceanic and Atmospheric Administration
NOVA	Notice of violation and assessment
NPFMC	North Pacific Fishery Management Council
OFL	Overfishing limit
PBR	Potential biological removal
PDO	Pacific Decadal Oscillation
PSC	Prohibited Species Catch
RFM	Responsible Fisheries Management
RIR	Regulatory Impact Review
SAFE	Stock Assessment and Fishery Evaluation (report)
SASH	Sexual assault, sexual harassment
SSB	Spawning stock biomass
SSC	Scientific and Statistical Committee
TAC	Total allowable catch
USFWS	U.S. Fish and Wildlife Service
VMS	Vessel monitoring system

1 EXECUTIVE SUMMARY

Table 1. General information and the fishery

Fishery name	Alaska Pollock Fishery		
Fishery being assessed	**Applicant Group:** At-sea Processors Association (APA) **Product Common Name (*Species*):** Alaska pollock (*Gadus chalcogrammus*) **Geographic Location:** Gulf of Alaska (GOA) and Bering Sea and Aleutian Islands (BSAI) within Alaska jurisdiction (200 nautical miles [nm] exclusive economic zone [EEZ]) **Gear Types:** Pelagic Trawl (main), other gears (bottom trawl, jig, longline, pot) from other non-directed pollock fisheries legally landing pollock **Principal Management Authority:** National Marine Fisheries Service (NMFS); North Pacific Fishery Management Council (NPFMC); Alaska Department of Fish and Game (ADFG); Alaska Board of Fisheries (BOF)		
Date certified	December 6, 2011; recertified December 6, 2017; second recertification February 6, 2023	Date of certificate expiry	February 5, 2028
Surveillance type	On-site surveillance		
Date of surveillance audit	April 28-29, 2025		
Surveillance stage	1st Surveillance		
	2nd Surveillance	X	
	3rd Surveillance		
	4th Surveillance		
	Other (expedited etc)		
Surveillance team	Lead assessor: Jodi Bostrom Assessors: Giuseppe Scarcella, Paul Knapman		

The Responsible Fisheries Management (RFM) Certification Program is a voluntary program that is owned and managed by the Certified Seafood Collaborative to provide an independent, third-party certification that can be used to verify that these fisheries are responsibly managed according to the RFM standard. Additionally, application to the RFM is only available for fisheries operating within the North American fisheries operating in the U.S. and Canadian 200 nm EEZ.

The RFM Certification Program uses the fundamental clauses of the RFM Fisheries Standard Version 2.1 and is in accordance with ISO 17065 accredited certification procedures. The assessment is based on the fundamental clauses specified in the RFM Fisheries Standard Version 2.1. It is based on four key components of responsible management derived from the Food and Agriculture Organization of the United Nations (FAO) Code of Conduct for Responsible Fisheries (1995) and Guidelines for the Eco-labeling of products from marine capture fisheries (2009).

A The Fisheries Management System
B Science, Stock Assessment Activities, and the Precautionary Approach
C Management Measures, Implementation, Monitoring, and Control
D Serious Impacts of the Fishery on the Ecosystem

The purpose of this annual surveillance report is to:

1. Establish and report on any material changes to the circumstances and practices affecting the original complying assessment of the fishery
2. Monitor any actions taken in response to non-conformances raised in the original assessment of the fisheries
3. Rescore any clauses where practice or circumstances have materially changed since the last audit

1.1 Audit conclusion

Fishery	Status of certification	Comment
Alaska pollock (*Gadus chalcogrammus*) caught by vessels within APA using pelagic trawl and other gears (bottom trawl, jig, longline, and pot) from other non-directed pollock fisheries legally landing pollock caught in the GOA and BSAI within Alaska jurisdiction (200 nm EEZ) managed by the NMFS, NPFMC, ADFG, and Alaska BOF	**Certified**	Following the second surveillance audit conducted on April 28-29, 2025, the team recommends the continued certification of this fishery according to the RFM Fisheries Standard v2.1.

2 ASSESSMENT TEAM DETAILS

Jodi Bostrom DNV Lead Assessor and main area of responsibility Fundamental clause D (Serious Impacts of the Fishery on the Ecosystem)	Jodi Bostrom is a senior assessor and team leader for Marine Stewardship Council (MSC) Fisheries and RFM Fisheries at DNV Business Assurance. She earned an M.Sc. in Environmental Science from American University and a B.Sc. in Zoology from the University of Wisconsin. She has over five years of experience in MSC fisheries assessment services. Prior to that, she worked for five years at the MSC as a Senior Fisheries Assessment Manager. Among other things, she developed the MSC's benthic habitats policy and the Consequence Spatial Analysis (a risk-based framework for assessing habitat impacts in data-deficient situations) as part of the MSC Standard revision. Prior to the MSC, Jodi spent 11 years with the US National Academy of Sciences' Ocean Studies Board where she worked on various projects from fisheries management and policy to bycatch and dredging impacts to eutrophication and sea level rise.
Paul Knapman Main areas of responsibility Fundamental clause A (Fisheries Management System) and C (Science, Stock Assessment Activities, and the Precautionary Approach)	Paul is an independent consultant based in Halifax, Nova Scotia, Canada. Paul began his career in fisheries more than 30 years ago as a fisheries officer in the UK, responsible for the enforcement of UK and EU fisheries regulations. He then joined the UK government's nature conservation advisors, establishing and managing their marine fisheries program. He developed an extensive program of work with fisheries managers, scientists, the fishing industry and ENGOs to integrate national and European fisheries and nature conservation requirements. He also helped lead a national four-year project contributing to the 2002 review of the Common Fisheries Policy. He then became Head of the largest inshore fisheries management organization in England, with responsibility for managing an extensive area of inshore fisheries on the North Sea coast. The organization's responsibilities and roles included: stock assessments; habitat monitoring; setting and ensuring compliance with total allowable catches and quotas; establishing and applying regional fisheries regulations; the development and implementation of fishery management plans; the lead authority for the largest marine protected area in England. In 2004, Paul moved to Canada and established his own consultancy providing analysis, advisory and developmental work on fisheries management policy in Canada and Europe. He drafted the first management plan for one of Canada's marine protected areas, undertook an extensive review on illegal, unreported, and unregulated fishing in the Baltic Sea and was appointed as rapporteur to the European Commission's Baltic Sea Regional Advisory Council. In 2008, Paul joined Moody Marine as their Americas Regional Manager, responsible for managing and developing their regional MSC business. He became General Manager of the business in 2012. Paul returned to consultancy in 2015.
Giuseppe Scarcella Main area of responsibility Fundamental clause B (Science, Stock Assessment Activities, and the Precautionary Approach)	Giuseppe Scarcella is an experienced fishery scientist and population analyst and modeler, with wide knowledge and experience in the assessment of demersal stocks. He holds a first degree in Marine Biology and Oceanography (110/110) from the Unversità Politecnica delle Marche, and a Ph.D. in marine Ecology and Biology from the same university, based on a thesis "Age and growth of two rockfish in the Adriatic Sea". After his degree he was offered a job as project scientist in several research programs about the structure and composition of fish assemblage in artificial reefs, off-shore platform and other artificial habitats in the Italian Research Council – Institute of Marine Science of Ancona now Institute for Biological Resources and Marine Biotechnologies. During the years of employment, he has gained experience in benthic ecology, statistical analyses of fish assemblages evolution in artificial habitats, fisheries ecology and impacts of fishing activities, stock assessment, otolith analysis, population dynamic and fisheries management. During the same years he attended courses of uni-multivariate statistics and stock assessment. He is also actively participating in the scientific advice process of FAO GFCM in the Mediterranean Sea and Scientific, Technical and Economic Committee for Fisheries for the European Commission. He is author and co-author of more than 50 scientific paper peer reviewed journals and more than 200 national and international technical reports, most of them focused on the evolution of fish assemblages in artificial habitats and stock assessment and fishery management.

3 BACKGROUND ON THE FISHERY

3.1 Fishery description

Following the fourth surveillance audit of the last certification cycle, a non-conformance was placed on Fundamental Clause 3. This non-conformance was closed at the first surveillance audit of this new certification cycle. All information on this fishery can be obtained from the original full assessment report, subsequent surveillance reports, and recertification reports available for download at https://csicertified.org/certified-fishery-species/alaska-pollock/. Recent catch is similar to previous years, and recent data are presented in Table 2.

Table 2. Total allowable catch (TAC) and catch data for 2024

Species	Latin name	2024 TAC (metric ton; mt)	2024 Total Catch (mt)
Pollock in BSAI	*Gadus chalcogrammus*	1,319,000	1,249,662
Pollock in GOA	*Gadus chalcogrammus*	195,720	125,151

3.2 Previous assessments and surveillance audits

The Alaska pollock fisheries were first certified under the requirements of the Alaska RFM standard v1.2 on December 6, 2011. The initial certification and four annual surveillance audits were carried out by the certification body Global Trust.

On April 15, 2017, the certificate for this fishery was transferred from Global Trust to DNV GL (now DNV). The certificate transfer and the fourth surveillance audit were carried out by DNV. During June-December 2017, the fishery went through the full reassessment against a newer version of the standard, v1.3. This reassessment did not result in any changes in the compliance of the fishery with the RFM standard, and no non-conformances were raised. The new certificate was, therefore, issued with the validity date until December 5, 2022.

In January 2021, the fourth surveillance of the recertification took place via an off-site surveillance audit, which was done in conjunction with the reassessment site visit, and the surveillance report was issued on May 27, 2022. Following the results of the second reassessment, the fishery was recertified against the RFM Fisheries Standard v2.1 with one non-conformance. The certificate was issued with the validity date until February 5, 2028.

The first surveillance audit of this new certification cycle took place via an off-site surveillance audit on March 8, 2024. During the surveillance audit, the non-conformance was closed.

4 THE ASSESSMENT PROCESS

The RFM assessment/reassessment evaluates the fishery against the conformance criteria outlined in the RFM's Fishery Standard v2.1, which contains clauses that are categorized into four sections:

- Section A – The Fishery Management System
- Section B – Science and Stock Assessment Activities and the Precautionary Approach
- Section C – Management Measures, Implementation, Monitoring, and Control
- Section D – Serious Impacts of the Fishery on the Ecosystem

Scoring of each clause is based on a series of Evaluation Parameters: Process, Current Status/Appropriateness/Effectiveness, and Evidence Basis. The scoring guidelines, which are used for all clauses, are as follows:

- If all Evaluation Parameters are satisfied, the clause is scored in full conformance.
- If any single Evaluation Parameter is not satisfied, the clause is scored in minor non-conformance.
- If any two Evaluation Parameters are not satisfied, the clause is scored in major non-conformance.
- If any three or more Evaluation Parameters are not satisfied,the clause is scored in critical non-conformance.

During the assessment/reassessment, the fishery is assigned a confidence rating for each clause, which signifies the confidence of the assessment team that the fishery is demonstrated to be in conformity to the requirements of that clause. Clauses are scored according to the following confidence ratings:

- Low confidence rating (critical non-conformance level) – Information and/or evidence is completely absent or contradictory to whether an element of the fishery complies with the given requirements of a supporting clause. In these cases, a low confidence rating, equivalent to a critical non-conformance, is assigned.
- Medium confidence rating (major non-conformance) – Information and/or evidence is limited. In these cases, major improvement is needed to achieve full conformance, and a medium confidence rating with a major non-conformance is assigned.
- Medium confidence rating (minor non-conformance) – Information and/or evidence is broadly available; however, there are some information gaps. In these cases, minor improvement is needed to achieve full conformance, and a medium confidence rating with a minor non-conformance is assigned.
- High confidence rating (full conformance) – Sufficient information and/or evidence is available to demonstrate full conformance. In these cases, a high confidence rating is assigned.

Annual surveillance audits are undertaken to review any changes in the fishery since the last assessment, reassessment, or surveillance audit. Progress toward closing any non-conformances is also evaluated.

4.1 Surveillance audit meetings

The surveillance announcement was announced publicly on Certified Seafood Collaborative's website (https://csicertified.org/certified-fishery-species/alaska-pollock/) on March 27, 2025. The audit took place on-site in Seattle, Washington on April 28-29, 2025.

4.2 Stakeholder input

Table 3 provides the agenda and list of participants. (Note that this RFM surveillance audit was held in conjunction with the fishery's audit against the MSC Standard and with the MSC and RFM audits for the Alaska cod (Alaska Fisheries Development Foundation [AFDF]) and Alaska flatfish (Alaska Seafood Cooperative [AKSC]) fisheries, which in some cases involved MRAG Americas and their subcontractors.) DNV received no written stakeholder input before the audit and no requests to meet with the team. The team did receive an update on the fishery, including the latest catch data, from the client prior to the audit.

Table 3. Surveillance agenda and participants

Date	Topics	Attendees	All Times PDT
April 28	RFM/MSC AK groundfish joint client opening meeting • Introduction of the team, their roles and responsibilities • Review scope of assessment,	Austin Estabrooks (APA) Kristy Clement (AFDF) Ann Robertson (Consultant for AFDF) Beth Concepcion (AKSC) Sara Webster (AKSC)	10:00-10:30 am

Date	Topics	Attendees	All Times PDT
	audit criteria, assessment process and objectives of the audit • Review of the agenda and timeline for the assessment	Chris Woodley (AKSC) Giuseppe Scarcella (DNV and MRAG Americas subcontractor) Paul Knapman (DNV subcontractor) Jodi Bostrom (DNV) Erin Wilson (MRAG Americas) Nick Hahlbeck (MRAG Americas) Susan Ranck (ANAB observer) Wyatt Fournier (MSC observer)	
	RFM/MSC meeting with pollock client • Review of basic info about the company • Review of scope • Review of fishing operations • Review of impact on ecosystem • Compliance with rules and regulations • Review of progress against conditions and recommendations • Review of traceability risks	Austin Estabrooks (APA) Julie Bonney, Chelsae Radell, Shelby Bacus (Alaska Groundfish Data Bank – GOA pollock representatives) Giuseppe Scarcella (DNV and MRAG Americas subcontractor) Paul Knapman (DNV subcontractor) Jodi Bostrom (DNV) Erin Wilson (MRAG Americas) Nick Hahlbeck (MRAG Americas) Susan Ranck (ANAB observer) Wyatt Fournier (MSC observer)	11:30 am – 12:30 pm
	End of Day 1		
April 29	RFM/MSC meeting with NPFMC • Review of management measures, regulations, etc.	Dave Witherell (NPFMC) Diana Evans (NPFMC) Sarah Marrinan (NPFMC) Taylor Holman (NPFMC) Kate Haapala (NPFMC) Giuseppe Scarcella (DNV and MRAG Americas subcontractor) Paul Knapman (DNV subcontractor) Jodi Bostrom (DNV) Erin Wilson (MRAG Americas) Nick Hahlbeck (MRAG Americas) Susan Ranck (ANAB observer) Wyatt Fournier (MSC observer)	1:00-2:30 pm
	Break		2:30-2:45 pm
	RFM closing meeting with pollock client • Preliminary results • Post-audit process and timeframes • Confirm availability of information and resources required by cutoff date	Austin Estabrooks (APA) Giuseppe Scarcella (DNV subcontractor) Paul Knapman (DNV subcontractor) Jodi Bostrom (DNV) Susan Ranck (ANAB observer)	3:15-4:00 pm
	End of Audit		

5 UPDATES TO AND CHANGES WITHIN THE FISHERY

5.1 Target species biology

Walleye pollock (*Gadus chalcogrammus*), commonly referred to as Alaska pollock, is one of the most ecologically and economically significant groundfish species in the North Pacific Ocean. Its distribution spans a broad range across the North Pacific, from the Sea of Japan and the Sea of Okhotsk to the Eastern Bering Sea (EBS), Aleutian Islands (AI), and GOA, with the largest commercial concentrations found in U.S. waters off Alaska.

Alaska pollock supports the largest single-species fishery in the United States by volume and is a cornerstone of the U.S. seafood industry. In addition to its economic value, pollock plays a critical ecological role as a mid-trophic-level species in both BSAI and GOA ecosystems. It serves as a major forage species for a wide variety of higher trophic level predators including marine mammals (such as Steller sea lions), seabirds, and larger fish species (such as Pacific cod and arrowtooth flounder), while also being an important predator of zooplankton and smaller fish.

According to FishBase, the trophic level of Alaska pollock is approximately 3.6, indicating it occupies a mid-level position in the marine food web, feeding primarily on euphausiids, copepods, and small fishes (https://www.fishbase.se/summary/Gadus-chalcogrammus.html). This trophic position is further supported by food web analyses conducted by National Oceanic and Atmospheric Administration's (NOAA) Alaska Fisheries Science Center (AFSC), which place pollock as a dominant mid-level consumer rather than a lower trophic level species such as small pelagic fish or zooplankton (https://apps-afsc.fisheries.noaa.gov/Publications/AFSC-TM/NOAA-TM-AFSC-178.pdf). Therefore, Alaska pollock stocks are not considered lower trophic level resources but rather function as key intermediaries in the energy transfer from plankton to higher predators.

NOAA Fisheries (NMFS) currently manages Alaska pollock as three distinct stocks based on geographic and biological considerations:

- **EBS stock**, which supports the largest fishery and is managed as a Tier 1 stock under the NPFMC framework due to its rich data availability and well-developed assessment models.
- **AI stock**, which is smaller and less productive, managed separately to account for ecological and oceanographic differences in this region.
- **GOA stock**, which supports a significant fishery and is managed independently to reflect different population dynamics and environmental drivers compared to the BSAI regions.

These management units recognize the spatial structure of the species' population and are informed by extensive scientific assessments, including genetic studies, tagging research, and ecosystem modeling. Pollock's ecological role and its importance to fisheries management make it a focal point of NOAA's ecosystem-based fishery management strategies across Alaskan waters.

5.2 Scientific stock assessment

5.2.1 AI pollock

Pollock in the AI have experienced notable fluctuations in abundance and spatial distribution since the 1980s, driven by environmental variability, undocumented foreign fishing in the late 1980s (Egan, 1988a, 1988b), and recruitment variability (Coulson et al., 2006; Carr and Marshall, 2008). After reaching 444,000 t in 1986, biomass declined to 78,000 t by 1994, followed by variable recovery reaching 165,565 t by 2024, with high uncertainty (CV: 0.24–0.47 since 2014).

Biomass has shifted eastward since 2004, likely due to recruitment failures in the Central Bering Sea (BS) and past exploitation pressures (Bailey et al., 1999). Genetic studies reveal AI pollock are more similar to GOA stocks than EBS stocks (Grant et al., 2010), with weak genetic differentiation near Adak and Atka (Barbeaux et al., 2016). Recruitment events in 1978, 1989, 2000, and 2012 were shared with other regions, though AI-specific peaks occurred in 1981, 1983, and 1986 (Figure 1).

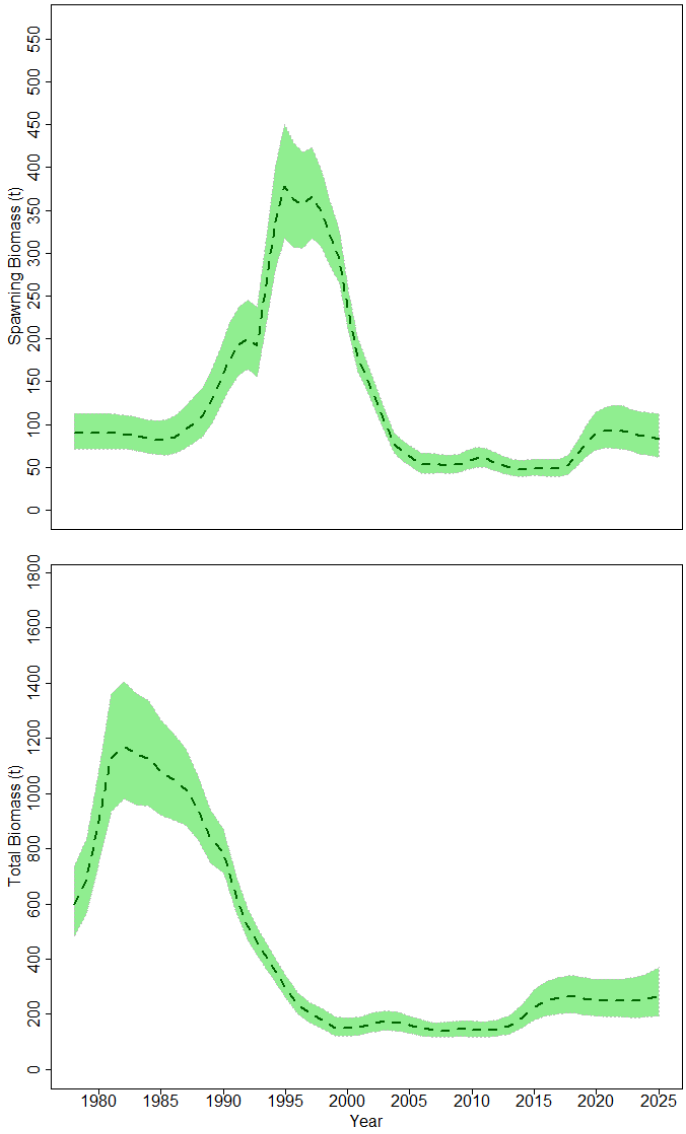

Figure 1. Estimates of AI pollock spawning stock biomass (SSB) (upper graph) and age 1+ total biomass (lower graph) in 1,000s of tons from the authors' preferred Model 15.1. Confidence intervals are two standard deviations.

Stock assessment utilizes the AMAK model (Barbeaux et al., 2015) implemented in ADMB software (Fournier, 1998), with Models 15.1 and 15.2 estimating mortality and recruitment dynamics. The 2024 assessment indicates the stock is above B20% (20% of the equilibrium SSB in the absence of fishing) with low exploitation rates (Figure 2; Barbeaux et al., 2024). However, high uncertainty persists, and recent recruitment has been low. Historical analysis shows that the 1978-year class dominates recruitment history, raising concerns about overestimation of stock productivity. Current management remains precautionary under Tier 5 guidelines.

Female SSB rose to a peak of 378,483 t in 1984 from 176,915 t in 1978 due to the large 1978-year class. SSB remained high in the late 1980s as the larger than average 1981, 1982, 1983, and 1986-year classes matured (Figure 2). The early 1990s fishery appeared to concentrate on the older fish, particularly the 1978-year class. This is consistent with a switch in the domestic fishery to a concentration on spawning aggregations for roe. The status of AI pollock in 2023 and 2024 was assessed to be well above B20% and had low exploitation rates (Figure 2).

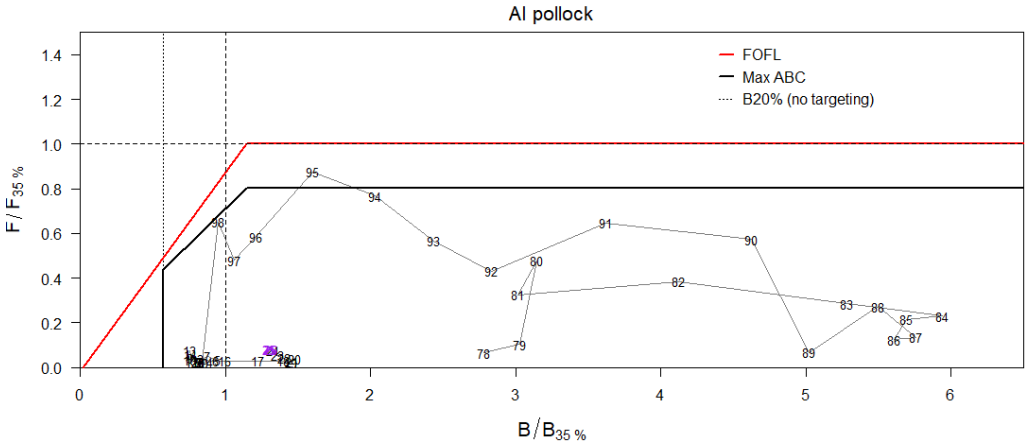

Figure 2. AI pollock spawning biomass relative to BMSY and full-selection fishing mortality relative to FMSY (1978-2026). The ratio of fishing mortality to FMSY is calculated using the estimated selectivity pattern in that year. 2025 and 2026 are plotted with catch assumed to be at the five-year average of F = 0.032 (Alternative 3). Source: Barbeaux et al. 2024

The Tiers require reference point estimates for biomass level determinations. The following reference points for Tier 3 of Amendment 56 are in Table 4.

Table 4. Summary of results of AI walleye pollock. Source: Barbeaux et al. 2024

Quantity	As estimated or *specified last* year for: 2024	2025	As estimated or *recommended this* year for: 2025	2026*
M (natural mortality rate)	0.21		0.21	
Tier	3a		3a	
Total (age 1+) biomass (t)	279,764	302,068	288,407	305,528
Female spawning biomass (t)				
Projected	79,747	81,335	82,781	80,639
$B_{100\%}$	174,218		182,006	
$B_{40\%}$	69,687		72,802	
$B_{35\%}$	60,976		63,709	
F_{OFL}	0.380	0.380	0.406	0.406
$maxF_{ABC}$	0.305	0.305	0.325	0.325
F_{ABC}	0.305	0.305	0.325	0.325
OFL (t)	51,516	53,030	55,728	56,231
maxABC (t)	42,654	43,863	46,051	46,437
ABC (t)	42,654	43,863	46,051	46,437
Status	2022	2023	2023	2024
Overfishing	no	n/a	no	n/a
Overfished	n/a	no	n/a	no
Approaching overfished	n/a	no	n/a	no

* Projection based on estimated catches of 5,106 t for 2024 and 5,156 t for 2025, the five-year average *F* (2019-2023) of 0.032, used in place of maximum permissible ABC for 2025.

5.2.2 EBS pollock

EBS pollock remains one of the largest and most commercially valuable stocks globally. Spawning occurs from March to May, with early life stages influenced by environmental factors (Duffy-Anderson et al., 2016; Gann et al., 2015). Juveniles shift from plankton to piscivory as they grow (Buckley et al., 2009; Livingston, 1991).

Since the 1960s, the fishery has evolved from foreign to fully domestic operations with strict observer coverage and electronic monitoring (EM) (Ianelli and Williamson, 2007). The fishery is managed under Tier 1a, with biomass currently well above BMSY (147% of BMSY; Table 12; Ianelli et al., 2024).

Recent surveys reveal biomass increases and strong recruitment from the 2018 year class. The 2024 Acoustic-Trawl Survey estimated biomass at 2.87 million t, down 25% from 2022, consistent with other surveys (Honkalehto and McCarthy, 2015). Projections show stable stock conditions with low risk of falling below management thresholds (Ianelli et al., 2024; Figure 3; Figure 4).

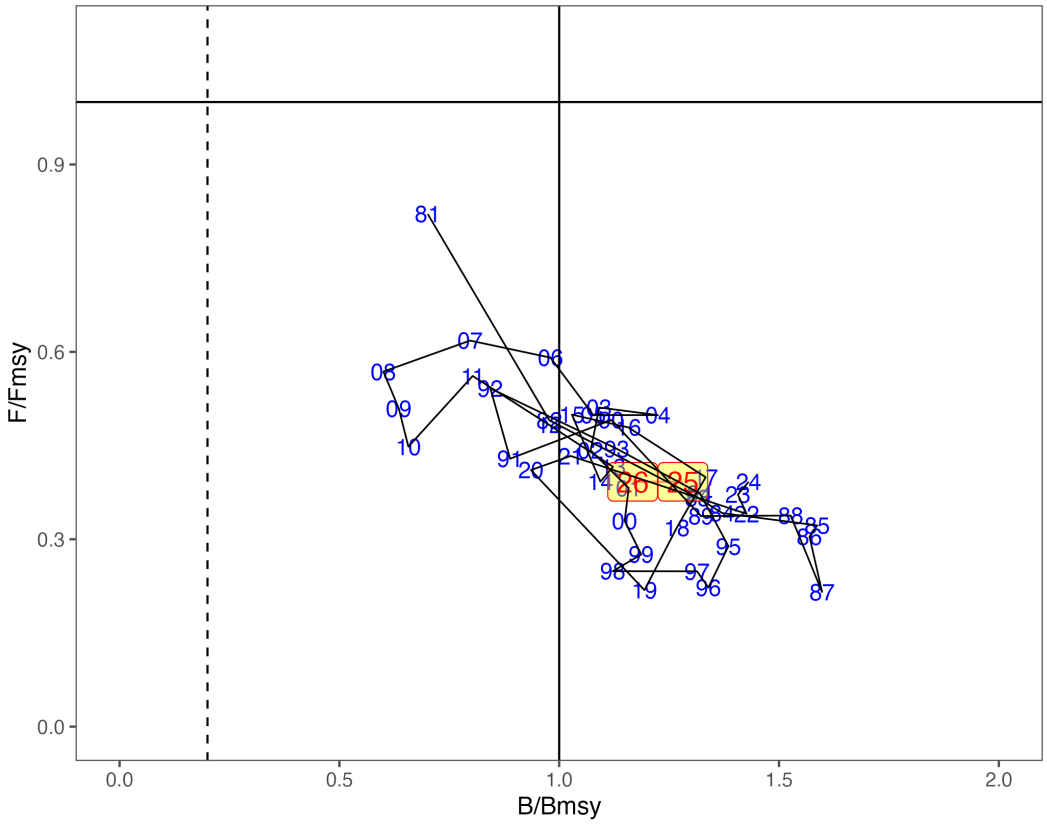

Figure 3. Estimated SSB relative to annually estimated FMSY values and fishing mortality rates for EBS pollock. Two projection years are shaded in yellow. Source: Ianelli et al., 2024

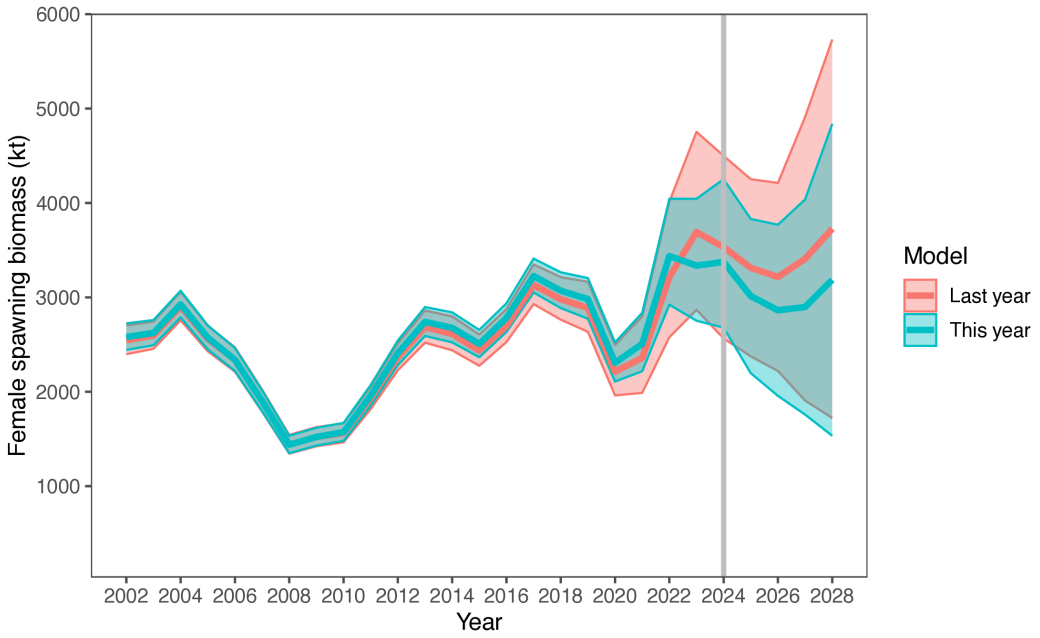

Figure 4. The estimated EBS pollock SSB for model 23 last year and this with projections equal to the estimated fishing mortality from 2024. Source: Ianelli et al., 2024

The estimate of BMSY is 2,310 kt (with a CV of 30%) which is less than the projected 2025 spawning biomass of 3,100 kt. For 2025, the estimates put the stock in Tier 1a. The corresponding maximum permissible ABC would thus be 3,715,000 t with a fishable biomass estimated at around 8,378 kt. For the current year SSB, this corresponds to 147% of the BMSY level (Table 5).

Table 5. Summary of results of EBS walleye pollock. Source: Ianelli et al. 2024

Tier 1 version

	As estimated or *specified* *last* year for:		As estimated or *recommended* *this* year for:	
Quantity	2024	2025	2025	2026
M (natural mortality rate, ages 3+)	0.3	0.3	0.3	0.3
Tier	1a	1a	1a	1a
Projected total (age 3+) biomass (t)	10,184,000 t	9,437,000 t	8,526,000 t	8,075,000 t
Projected female spawning biomass (t)	3,518,000 t	3,255,000 t	3,118,000 t	3,342,000 t
B_0	6,728,000 t	6,728,000 t	5,975,000 t	5,975,000 t
B_{msy}	2,689,000 t	2,689,000 t	2,310,000 t	2,310,000 t
F_{OFL}	0.422	0.422	0.523	0.523
$maxF_{ABC}$	0.379	0.379	0.443	0.443
F_{ABC}	0.33	0.33	0.402	0.402
OFL	3,162,000 t	3,449,000 t	4,383,000 t	3,785,000 t
$maxABC$	2,837,000 t	3,095,000 t	3,715,000 t	3,209,000 t
ABC	2,313,000 t	2,401,000 t	2,417,000 t	2,036,000 t
Status	2022	2023	2023	2024
Overfishing	No	n/a	No	n/a
Overfished	n/a	No	n/a	No
Approaching overfished	n/a	No	n/a	No

Tier 3 version

	As estimated or *specified* *last* year for:		As estimated or *recommended* *this* year for:	
Quantity	2024	2025	2025	2026
M (natural mortality rate, ages 3+)	0.3	0.3	0.3	0.3
Tier	1a	1a	3a	3a
Projected total (age 3+) biomass (t)	10,184,000 t	9,437,000 t	8,526,000 t	8,075,000 t
Projected female spawning biomass (t)	3,518,000 t	3,255,000 t	3,118,000 t	3,342,000 t
$B_0(B_{100\%})$	6,728,000 t	6,728,000 t	5,902,000 t	5,902,000 t
$B_{msy}(B_{35\%})$	2,689,000 t	2,689,000 t	2,066,000 t	2,066,000 t
F_{OFL}	0.422	0.422	0.513	0.513
$maxF_{ABC}$	0.379	0.379	0.394	0.394
F_{ABC}	0.33	0.33	0.394	0.394
OFL	3,162,000 t	3,449,000 t	2,957,000 t	2,496,000 t
$maxABC$	2,837,000 t	3,095,000 t	2,417,000 t	2,036,000 t
ABC	2,313,000 t	2,401,000 t	2,417,000 t	2,036,000 t
Status	2022	2023	2023	2024
Overfishing	No	n/a	No	n/a
Overfished	n/a	No	n/a	No
Approaching overfished	n/a	No	n/a	No

5.2.3 GOA pollock

GOA pollock is genetically distinct from EBS stocks, though latitudinal gradients and mixing near Adak and Atka exist (Grant and Utter, 1980; I. Spies, pers. comm., 2021). The fishery transitioned to domestic operations in 1988, targeting pre-spawning aggregations in winter and deeper waters in summer. The 2023 biomass estimate was 921,886 t, driven by the 2020- and 2017-year classes. Acoustic and trawl surveys confirmed biomass increases, with a 71.7% rise in 2023 and a 17.2% increase in nearshore biomass (Monnahan et al., 2023). The age-structured model (1970-2024) accounts for fishing mortality, recruitment variability, and environmental influences. Model 23d, the preferred model, improved fit and precision, with spawning biomass at 56% of unfished levels in 2024 (Figure 5 and Figure 6; Monnahan et al., 2024).

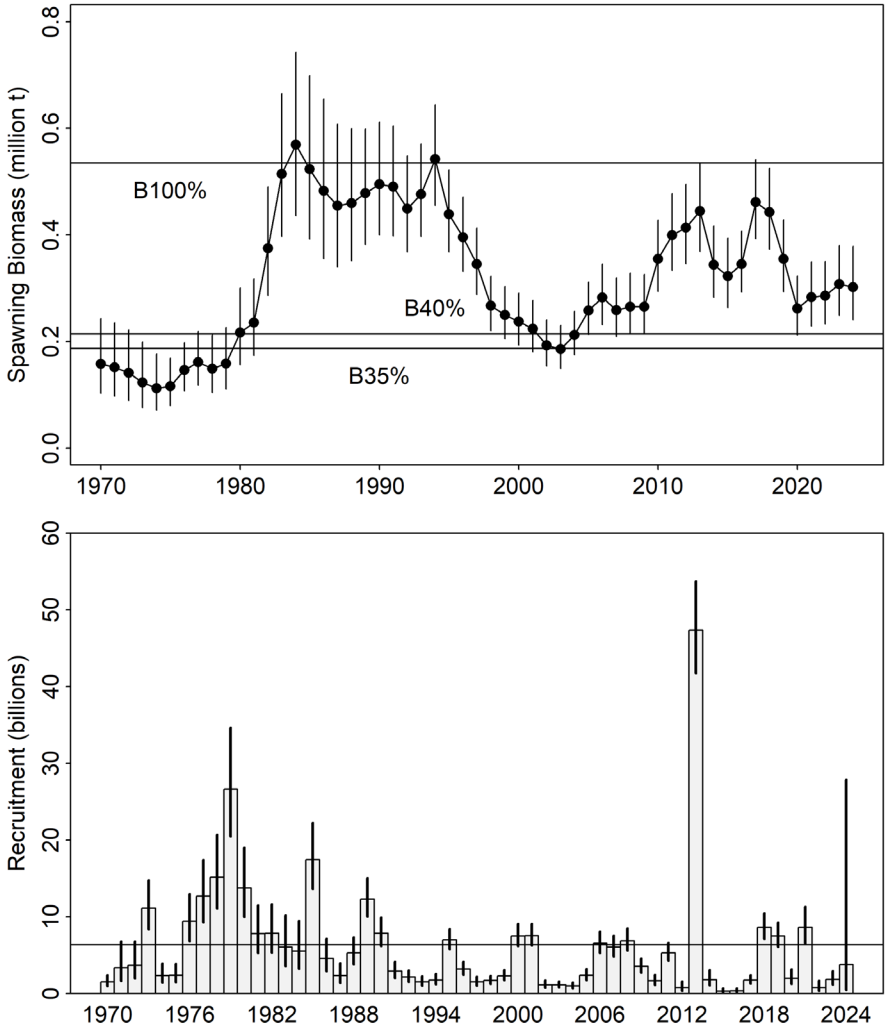

Figure 5. Estimated time series of GOA pollock spawning biomass (top) and age 1 recruitment (bottom) for the base model, with horizontal line at the average from 1978-2023. Vertical bars represent two standard deviations. The B35% and B40% lines represent the current estimate of these benchmarks. Source: Monnahan et al., 2024

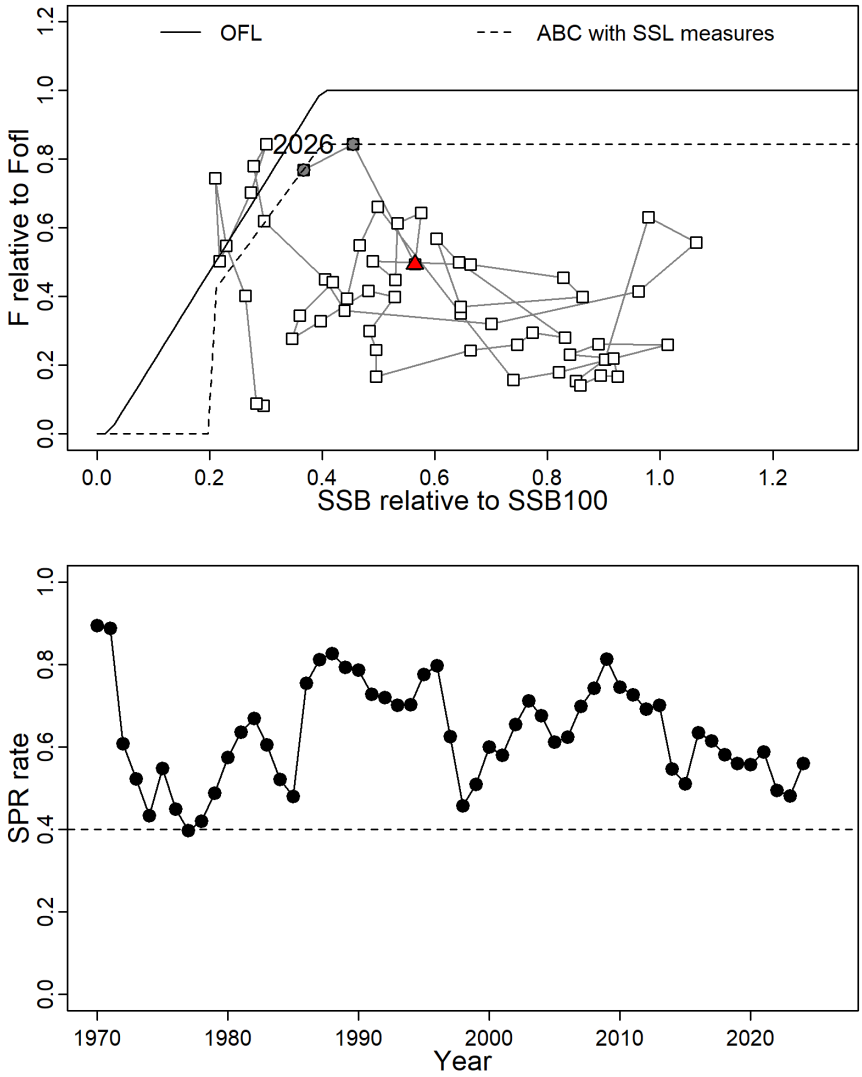

Figure 6. Annual fishing mortality as measured in percentage of unfished spawning biomass per recruit (top). GOA pollock spawning biomass relative to the unfished level and fishing mortality relative to FMSY (bottom). The ratio of fishing mortality to FMSY is calculated using the estimated selectivity pattern in that year. Estimates of B100% SSB are based on current estimates of maturity at age, weight at age, and mean recruitment. Because these estimates change as new data become available, this figure can only be used in a general way to evaluate management performance relative to biomass and fishing mortality reference levels. Source: Monnahan et al., 2024

The recommended 2025 acceptable biological catch (ABC) is 181,022 t, a 5.1% decrease from 2024, with an overfishing limit (OFL) of 210,111 t. Projections suggest negligible risk of the stock dropping below the B20% threshold through 2029. Harvest strategies were evaluated under various scenarios, with results supporting the maximum permissible ABC for 2025 (Table 6).

Table 6. Summary of results of GOA walleye pollock. Source: Monnahan et al. 2024

Status Summary for Gulf of Alaska Pollock in W/C/WYK Areas

Quantity/Status	As estimated or *specified last* year for: 2024	2025	As estimated or *recommended this* year for: 2025*	2026*
M (natural mortality)	0.300	0.300	0.300	0.300
Tier	3a	3a	3a	3a
Projected total (age 3+) biomass (t)	1,154,403	1,430,029	1,269,931	1,005,310
Projected female spawning biomass (t)	274,141	227,091	243,078	196,028
$B_{100\%}$	505,000	505,000	535,000	535,000
$B_{40\%}$	202,000	202,000	214,000	214,000
$B_{35\%}$	177,000	177,000	187,000	187,000
F_{OFL}	0.307	0.307	0.321	0.321
$maxF_{ABC}$	0.260	0.260	0.271	0.271
F_{ABC}	0.260	0.260	0.271	0.271
OFL (t)	269,916	182,891	**210,111**	153,971
*max*ABC (t)	232,543	157,687	181,022	133,075
ABC (t)	190,740	157,687	**181,022**	133,075
Status	As determined *last* year for: 2023	2024	As determined *this* year for: 2024	2025
Overfishing	No	n/a	No	n/a
Overfished	n/a	No	n/a	No
Approaching overfished	n/a	No	n/a	No

*Projections are based on an estimated catch of 131,000 t for 2024 and 181,022 t and 133,075 t for 2025 and 2026.

Current environmental conditions are favorable, with ocean temperatures within optimal ranges for pollock and above-average zooplankton prey abundance. Predation pressure is moderate, and the fishery shows no major ecosystem concerns, supporting a Level 1 Normal risk score.

5.3 Management practices of the competent management authority

5.3.1 Programmatic Evaluation Process

As reported at last year's audit, NPFMC had initiated a Programmatic Evaluation (i.e., a review of its management policies, goals, and objectives for all federally managed fisheries in the BSAI and GOA with the intent of ensuring the Council's management framework is adequate to address current and future challenges, including climate change, and to improve the council's ecosystem-based management approach). At the April 2025 Council, it was to pause the process, given the uncertainty regarding forthcoming changes to NMFS' priorities, funding, and other resources.

On a similar theme of uncertainty of future priorities and funding, the NPFMC April Newsletter notes that the Council's Scientific and Statistical Committee (SSC) have reviewed several AFSC survey-related aspects including the existing AFSC organizational structure, current fishery resource and ecosystem surveys, their spatial coverage and frequency, and the current AFSC modernization efforts and prioritization of surveys, and survey impacts to data streams. The SSC acknowledged the high degree of uncertainty in future federal funding for surveys, and the loss of staff and expertise that has already occurred in 2025, and emphasized that both will have substantive impacts on the information and data produced from the AFSC surveys that inform federal fisheries management in the North Pacific. A core set of surveys were identified, including bottom trawl surveys in the EBS, GOA, and the AI, acoustic surveys in the EBS and Shelikof Strait, and the longline survey, which are essential to support the stock assessments that underpin sustainable fisheries management in the North Pacific. Additional suggestions for consideration of data streams and potential impacts on assessments are contained in the SSC minutes.

5.3.2 Chum salmon bycatch in BS

In February 2025, the Council reviewed a second preliminary analysis of proposed management alternatives to reduce chum salmon bycatch, particularly the bycatch of chum salmon originating from Western Alaska river systems, to the extent practicable in the BS pollock fishery. The Council approved additional changes to the proposed management alternatives being considered and recommended NMFS publish the revised analysis as the draft Environmental Impact Statement after additional analysis of these new alternatives.

Annual genetic sampling by fishery observers shows the BS pollock fishery incidentally catches chum salmon originating from countries across the North Pacific Rim. The bycatch is composed of predominantly hatchery origin Russian and Asian chum salmon. On average over the last decade, approximately 17% of the pollock fishery's chum salmon bycatch has been attributed to Western Alaska. However, the Council is focused on management actions that could minimize Western Alaska chum salmon bycatch because of the recent and ongoing declines in abundance, which have reduced or eliminated in-river harvest opportunities and resulted in broader negative impacts on communities and residents across Western and Interior Alaska that rely on chum salmon for cultural, nutritional, economic, and spiritual wellbeing.

The management measures being considered all aim to reduce Western Alaska chum salmon bycatch. These include limits or "caps" on the number of chum salmon that may be caught in the pollock fishery and closure of all or part of the BS to pollock fishing once the limit is reached. The Council approved changes to the existing alternatives and included new options for further evaluation including:

1. Modifying an alternative to provide an in-season corridor closure to focus on minimizing bycatch on Western Alaska chum salmon stocks. The new options for evaluation include both larger corridor closures, as well as more discrete corridor closures compared to the prior analysis, as well as modified cap amounts. These new closures could be managed either by NMFS in regulation or by the industry within their respective incentive plan agreements. Under either management framework, the in-season corridor boundaries, the closure window, and cap amount that triggers the closure would be set in federal regulations.
2. A threshold under which the corridor cap would not apply if the salmon abundance increased to a certain level.
3. Consideration for adjustments to the Winter Herring Savings Area start date with the intention of providing greater flexibility for chum salmon avoidance.
4. Additional analysis of the potential impacts and options for the Community Development Quota (CDQ) sector should their CDQ pollock be leased to non-Catcher Processor sectors in the future.

The next required step will be to formally publish the draft Environmental Impact Statement (EIS) as required by Federal law, after staff completes the environmental, social and cultural, and economic analysis of alternatives and options that were revised at the February meeting. Multiple alternatives can be selected, and the full description of the alternatives and options is available here. The Council is tentatively scheduled to review the published draft EIS as well as the public comments received and take final action to recommend a preferred alternative to NMFS in December 2025 or February 2026 with possible implementation in 2027.

5.3.3 Chinook salmon bycatch in BS

ADFG reported that the combined, post-season sum of the run sizes from the rivers comprising the three-river index (Upper Yukon, Unalakleet, and Kuskokwim Rivers) of Chinook salmon is 197,359 and is below the threshold level of 250,000. Therefore, the performance standard for the BS pollock fishery will remain at 33,318 Chinook salmon, and the prohibited species catch (PSC) limit will remain at 45,000, for 2025 and 2026, as identified in 50 CFR 679.21.

5.3.4 Climate Change Task Force

The Council convened a two-day Climate Scenarios Workshop on June 5-6, 2024. The purpose was to generate ideas for short- and long-term management approaches to improve climate resiliency of federally managed fisheries in the North Pacific.

The workshop included case studies of climate change impacts in Alaska fisheries, and examples of ongoing work by the Council, NMFS, and communities to build climate readiness and support adaptation. The main focus of the workshop was a set of four hypothetical future scenarios that described varying degrees of climate change impacts that could be experienced in the future, as well as a range of ecosystem-based management approaches that could be practiced by the Council. Participants explored these hypothetical scenarios through small group breakout sessions.

No decisions were made at the workshop. Council staff provided a preliminary overview of themes of workshop discussions during Council staff tasking. The final workshop report will be available in September 2025, and the public is invited to share additional

comments and ideas. The Council will receive a presentation on the workshop report in October, consider how ideas from the workshop may fit into new or existing Council initiatives, and consider how and when to take further action.

5.3.5 Revised Ecosystem-Based Fisheries Management (EBFM) Road Map

In January 2024, NMFS updated its EBFM Policy, which provides the background, definition, rationale, and legislative context for implementing EBFM under relevant mandates. In September 2024, NMFS released the 2024 revised EBFM Road Map, which provides specific actions under each goal identified in the EBFM Policy that will guide the Council's efforts to implement the Policy over the next five years. This includes specific actions aimed at advancing climate-ready decision making, which includes climate-informed science and management for trust resources and habitats.

The EBFM Policy provides six Guidelines to implement EBFM, builds on past progress, and clarifies NMFS's commitment to integrating its management programs for living marine resources and their habitats. The EBFM Road Map provides a national implementation strategy for the Policy. This Road Map describes how to operationalize the Policy's six Guidelines with Goals and Action Items to implement each Goal. The Guidelines are:

1. Implement ecosystem-level planning,
2. Advance understanding of ecosystem processes,
3. Prioritize vulnerabilities and risks to ecosystems and their components,
4. Explore and address trade-offs within an ecosystem,
5. Implement ecosystem considerations into management, and
6. Support ecosystem resilience via monitoring and adjusting of management actions.

NMFS' progress in the eight years since the initial 2016 Road Map was released, includes completing climate vulnerability assessments in all regions, providing ecosystem status reports in most regions, testing risk tables and scenario planning in multiple regions, and advancing the use of ecosystem models.

NMFS revised the final Road Map to incorporate ideas and comments from fishery management councils, including NPFMC. NMFS agrees with the NPFMC's principle comment on the importance of at-sea surveys to fisheries science and management; that idea is already part of the guiding documents and the EBFM Road Map. NMFS also revised the Road Map based on comments received from Alaska fisheries interests, including Alaska Native communities and organizations.

5.3.6 Regulatory changes – Amendment 126 (BASI) and 114 (GOA) Trawl Electronic Monitoring

As reported at last year's audit, Amendment 126 (BSAI) and Amendment 114 (GOA) Trawl Electronic Monitoring were in the final rule making stage of the Amendment process. This was completed and confirmed on July 29, 2024, became effective on August 28th 2024 and fishing under the new monitoring program began in January 2025. The purpose of Amendments 126 and 114 are to improve salmon accounting, reduce monitoring costs, improve the quality of monitoring data, and modify current retention and/or discard requirements as necessary to achieve these objectives in association with catcher vessels using trawl gear in the BS, AI, and GOA pollock fisheries along with associated tender vessels and processors. Implementation of EM on pollock catcher vessels in 2025 will result in a greater proportion of trips and salmon incidental catch amounts to be verified by independent fishery observers, resulting in more precision in PSC estimates of salmon.

5.3.7 Pelagic trawl gear definition

The Council reviewed a preliminary Regulatory Impact Review (RIR) focused on amending the Federal pelagic trawl gear definition and made revisions to the purpose and need and list of alternatives for analysis. The Council emphasized that this action is an essential step in ongoing efforts to minimize the impacts of pelagic trawl gear on bycatch, sensitive habitat, and unobserved mortality. At the October meeting, the Council affirmed that this action is intended to have a narrow scope and will focus solely on changes to the regulatory definition of pelagic trawl gear. The Council signaled within the revised purpose and need statement that clarifying this regulatory definition will facilitate the process to incentivize trawl gear innovation. This action is separate from ongoing Council efforts to incentivize gear innovations and amend performance standards. The next review of the RIR is scheduled for the June 2025 Council meeting. (NPFMC Newsletter, October 2024).

5.4 Impacts of fishery on ecosystem

5.4.1 Associated and endangered, threatened, and protected (ETP) species

“The ‘Main’ and ‘Minor’ bycatch classification together makes up 95% of the associated species bycatch profile of a given target fishery. The top 95% is assessed, while the bottom 5% is not assessed. Of the 95% assessed, the top 80% is classified as Main Associated Species Catch, while the bottom 15% is classified as Minor Associated Species Catch” (RFM Guidance to Performance Evaluation v2.0). In the case of the Alaska pollock fishery, the target catch is above 300,000 tons so, as per the RFM requirements, the main associated species constitute 85% instead of 80%, and the minor associated species constitute the bottom 10% instead of 15%.

Additionally, “ETP species must be acknowledged as such when recognized by national legislation adopted at the state and federal level in Alaska, or when recognized through a binding international agreement. Alternatively, species listed under Appendix 1 of the Convention on International Trade in Endangered Species (CITES) or under the International Union for the Conservation of Nature (IUCN) Red List and impacted negatively[1] by the fishery (i.e., direct or indirect mortality) shall be assessed as ETP unless it can be proven that their status in Alaska waters is above the point where recruitment is impaired or where other similar proxies indicate that the species is not biologically depleted” (RFM Guidance to Performance Evaluation v2.0).

It is known that certain gear types have more impact on certain species (e.g., longline are more likely to catch seabirds than demersal trawl). While gear-specific bycatch data are not available (except for seabirds and marine mammals), Section 6.1.2 provides details on the observer program and level of coverage.

Table 7 and Table 8 show catch data for the BSAI pollock and GOA pollock fisheries, respectively. None of the species are listed in CITES Appendix 1 or the IUCN Red List; however, the ones labeled as PSC (ETP) are protected by federal management measures limiting bycatch of these species. Overall, these catches and interactions are similar to previous years. Refer to Section 6.1.4 for more details.

[1] “For ETP species, interactions with the stock under consideration shall not cause departure from agreed management measures, such as those designed to allow for species restoration across a given geographical area. In other words, any interaction with or bycatch of ETP species shall be minimal and not considered significant, and/or disruptive in terms of ensuring the effectiveness of agreed management measures set up in order to achieve the management and conservation objectives for the ETP species in question.” (RFM’s Guidance to Performance Evaluation v2.0)

Table 7. Catch data of target, non-target, PSC/ETP, and habitat species for 2020-2024 by the BSAI pollock fishery. Blue = target species, green = main associated species, orange = minor associated species, yellow = PSC/ETP species, purple = habitats. Source: observer data

Species	Target, Main Associated, Minor Associated, Other Bycatch, PSC/ETP, or Habitat	Catch (in mt)						Percent of Total Average	Percent of Total Average Bycatch
		2020	2021	2022	2023	2024	Five-Year Average		
Pollock	Target	1,321,270.48	1,338,192.49	1,062,010.35	1,262,541.74	1,264,293.49	1,249,661.71	97.77%	NA
Alaska plaice	Minor associated	213.88	125.73	136.41	93.04	173.64	148.54	0.01%	0.52%
Alaska skate	Main associated	554.31	703.96	452.64	251.49	230.81	438.64	0.03%	1.54%
Aleutian skate	Minor associated	26.63	6.72	5.69	14.04	5.81	11.78	0.00%	0.04%
Arrowtooth flounder	Minor associated	695.11	413.29	279.50	252.34	332.16	394.48	0.03%	1.39%
Atka mackerel	Minor associated	569.12	544.97	201.50	40.24	45.00	280.17	0.02%	0.98%
Bairdi tanner crab*	PSC (ETP)	10,406.29	8,417.00	4,758.00	11,997.30	10,119.57	9,139.63	NA	NA
Benthic urochordata	Minor associated	1.92	1.32	1.55	1.20	2.06	1.61	0.00%	0.01%
Big skate	Minor associated	7.08	7.50	1.62	7.90	7.77	6.37	0.00%	0.02%
Bigmouth sculpin	Minor associated	31.18	0.00	0.00	0.00	0.00	6.24	0.00%	0.02%
Birds, unidentified*	Other bycatch	0.00	0.00	0.00	3.00	0.00	0.60	NA	NA
Blue king crab*	PSC (ETP)	1.00	0.44	59.00	0.00	1.00	12.29	NA	NA
Butter sole	Minor associated	22.03	31.01	11.34	23.56	23.80	22.35	0.00%	0.08%
Chinook salmon*	PSC (ETP)	32,298.46	13,852.00	6,415.00	11,874.00	8,054.40	14,498.77	NA	NA
Corals bryozoans, unidentified	Habitat	1.04	0.01	0.03	0.27	0.02	0.27	0.00%	0.00%
Dusky rockfish	Minor associated	32.91	12.75	6.30	7.27	12.45	14.34	0.00%	0.05%
Eelpouts	Minor associated	6.42	0.67	0.43	0.58	2.71	2.16	0.00%	0.01%
Flathead sole	Main associated	1,970.78	1,529.81	948.11	843.77	960.38	1,250.57	0.10%	4.39%
Giant grenadier	Minor associated	42.46	54.94	0.00	86.34	17.87	40.32	0.00%	0.14%
Golden king crab*	PSC (ETP)	521.81	115.00	165.00	132.00	4.00	187.56	NA	NA
Great sculpin	Minor associated	44.21	0.00	0.00	0.00	0.00	8.84	0.00%	0.03%
Halibut	PSC (ETP)	101.88	131.09	158.00	70.31	53.29	102.91	0.01%	0.36%
Herring	PSC (ETP)	3,861.12	1,708.27	1,708.00	3,087.08	1,280.61	2,329.02	0.18%	8.18%

Kamchatka flounder	Minor associated	181.80	49.38	158.44	35.33	13.62	87.71	0.01%	0.31%
Kittiwakes*	Other bycatch	3.00	7.01	0.00	3.00	0.00	2.60	NA	NA
Laysan albatross*	Other bycatch	8.00	0.00	0.00	0.00	0.00	1.60	NA	NA
Misc. fish	Minor associated	93.61	35.17	22.97	37.77	42.65	46.44	0.00%	0.16%
Murre*	Other bycatch	0.00	0.00	0.00	0.00	0.00	0.00	NA	NA
Non-Chinook salmon*	PSC (ETP)	320,477.51	546,472.00	242,375.00	112,512.42	35,151.57	251,397.70	NA	NA
Northern fulmar*	Other bycatch	96.14	103.15	128.00	56.00	93.06	95.27	NA	NA
Northern rockfish	Minor associated	157.90	83.82	46.44	40.76	44.82	74.75	0.01%	0.26%
Octopus	Minor associated	6.31	0.99	0.00	0.53	0.73	1.71	0.00%	0.01%
Opilio tanner crab*	PSC (ETP)	40,002.96	4,668.00	1,952.00	4,100.00	10,553.12	12,255.22	NA	NA
Other alcids*	Other bycatch	0.00	0.00	0.00	0.00	0.00	0.00	NA	NA
Pacific cod	Main associated	9,174.39	9,103.60	3,786.17	3,820.84	2,923.14	5,761.63	0.45%	20.24%
Pacific ocean perch	Main associated	6,047.70	2,468.19	1,467.95	1,345.46	1,812.33	2,628.32	0.21%	9.24%
Plain sculpin	Minor associated	6.63	0.00	0.62	0.00	0.00	1.45	0.00%	0.01%
Red king crab*	PSC (ETP)	432.17	52.00	311.00	54.45	230.04	215.93	NA	NA
Rex sole	Minor associated	499.75	189.79	104.55	203.61	209.39	241.42	0.02%	0.85%
Rock sole	Main associated	853.92	830.40	677.50	549.37	888.31	759.90	0.06%	2.67%
Rougheye rockfish	Minor associated	6.12	0.47	3.09	1.10	0.94	2.34	0.00%	0.01%
Sablefish	Main associated	3,457.07	1,106.06	352.76	490.15	105.19	1,102.25	0.09%	3.87%
Salmon shark	Minor associated	101.05	128.00	41.91	206.27	110.49	117.54	0.01%	0.41%
Sculpin	Minor associated	0.00	70.83	48.77	42.36	49.74	42.34	0.00%	0.15%
Sculpin, unidentified	Minor associated	34.21	0.00	0.00	0.00	0.00	6.84	0.00%	0.02%
Scypho jellies	Main associated	7,832.00	7,829.68	7,609.71	7,071.98	4,402.28	6,949.13	0.54%	24.42%
Sea anemone, unidentified	Minor associated	5.51	3.09	1.34	3.11	3.53	3.32	0.00%	0.01%
Sea pens, whips	Habitat	1.12	1.99	1.41	2.01	0.96	1.50	0.00%	0.01%
Sea star	Minor associated	61.36	19.99	184.56	27.90	15.63	61.89	0.00%	0.22%
Shearwaters*	Other bycatch	1.05	7.01	12.00	3.00	7.00	6.01	NA	NA

Shortraker rockfish	Minor associated	32.06	8.83	1.70	2.80	0.69	9.21	0.00%	0.03%
Skate, unidentified	Minor associated	235.15	190.46	100.20	123.01	125.61	154.88	0.01%	0.54%
Sleeper shark	Minor associated	29.34	40.92	13.63	62.73	19.26	33.18	0.00%	0.12%
Sponge, unidentified	Habitat	0.26	0.17	0.55	0.44	0.14	0.31	0.00%	0.00%
Squid	Main associated	6,178.72	3,821.91	3,704.60	3,942.05	4,384.22	4,406.30	0.34%	15.48%
Starry flounder	Minor associated	25.11	17.07	3.26	8.47	12.76	13.34	0.00%	0.05%
Thornyhead rockfish	Minor associated	11.16	2.07	3.11	4.07	9.46	5.97	0.00%	0.02%
Turbot	Minor associated	146.63	40.27	23.43	37.97	16.73	53.01	0.00%	0.19%
Urchins, dollars, cucumbers	Minor associated	20.62	0.12	0.16	0.15	0.13	4.24	0.00%	0.01%
White blotched skate	Minor associated	3.50	3.01	9.00	5.90	1.56	4.59	0.00%	0.02%
Yellow Irish lord	Minor associated	12.62	0.00	0.00	0.00	0.00	2.52	0.00%	0.01%
Yellowfin sole	Main associated	1,205.46	753.98	887.22	749.87	522.56	823.82	0.06%	2.89%
Total**		1,365,873.63	1,370,264.79	1,085,176.51	1,286,137.18	1,283,158.77	1,278,122.18		

Notes:
Associated and other bycatch species with percent of total average bycatch of ≤0.00% are not shown in table.
* Number of individuals instead of mt
** Does not include species with individual numbers instead of weight

Table 8. Catch data of target, non-target, PSC/ETP, and habitat species for 2020-2024 by the GOA pollock fishery. Blue = target species, green = main associated species, orange = minor associated species, yellow = PSC/ETP species, purple = habitats. Source: observer data

Species	Target, Main Associated, Minor Associated, Other Bycatch, PSC/ETP, or Habitat	Catch (in mt)						Percent of Total Average	Percent of Total Average Bycatch
		2020	2021	2022	2023	2024	Five-Year Average		
Pollock	Target	103,632.95	96,725.00	127,866.84	132,687.32	125,151.34	117,212.69	93.70%	NA
Aleutian skate	Other bycatch	1.03	0.46	0.76	0.00	0.00	0.45	0.00%	0.01%
Arrowtooth flounder	Main associated	2,416.79	810.00	771.00	834.19	590.66	1,084.53	0.87%	13.76%
Atka mackerel	Other bycatch	0.20	4.09	0.59	0.09	0.20	1.03	0.00%	0.01%
Bairdi tanner crab*	PSC (ETP)	19,003.39	1,791.00	746.00	1,256.28	1,395.00	4,838.33	NA	NA

Big skate	Minor associated	78.28	53.37	58.00	59.53	15.44	52.92	0.04%	0.67%
Bigmouth sculpin	Other bycatch	6.28	0.00	0.00	0.00	0.00	1.26	0.00%	0.02%
Butter sole	Other bycatch	23.79	1.92	3.36	0.63	1.15	6.17	0.00%	0.08%
Capelin	Other bycatch	54.00	0.00	0.00	0.00	0.00	10.80	0.01%	0.14%
Chinook salmon*	PSC (ETP)	10,866.52	10,595.00	13,220.00	18,351.53	25,771.74	15,760.96	NA	NA
Corals bryozoans, unidentified	Habitat	0.00	0.00	0.03	0.00	0.00	0.01	0.00%	0.00%
Dover sole	Other bycatch	12.11	0.89	0.20	2.58	0.00	3.16	0.00%	0.04%
Dusky rockfish	Other bycatch	24.55	37.00	47.37	46.58	11.20	33.34	0.03%	0.42%
English sole	Other bycatch	58.53	14.00	2.56	37.24	14.72	25.41	0.02%	0.32%
Eulachon	Other bycatch	22.33	0.00	0.00	0.00	0.00	4.47	0.00%	0.06%
Flathead sole	Minor associated	227.06	109.00	70.22	133.50	152.97	138.55	0.11%	1.76%
Giant grenadier	Other bycatch	11.33	9.48	29.51	12.29	0.03	12.53	0.01%	0.16%
Golden king crab*	PSC (ETP)	2.01	0.15	0.12	0.12	25.99	5.68	NA	NA
Great sculpin	Other bycatch	8.53	0.00	0.00	0.00	0.00	1.71	0.00%	0.02%
Halibut	PSC (ETP)	94.96	81.00	59.88	44.05	11.52	58.28	0.05%	0.74%
Herring	PSC (ETP)	60.38	16.37	83.00	67.88	35.19	52.56	0.04%	0.67%
Longnose skate	Other bycatch	22.39	14.94	17.48	20.21	0.00	15.00	0.01%	0.19%
Misc. fish	Minor associated	115.11	58.47	65.88	67.93	13.50	64.18	0.05%	0.81%
Non-Chinook salmon*	PSC (ETP)	2,161.54	1,160.00	1,033.00	2,167.00	2,155.53	1,735.42	NA	NA
Northern rockfish	Other bycatch	0.93	1.88	1.15	0.69	0.45	1.02	0.00%	0.01%
Octopus	Other bycatch	4.41	0.35	0.12	0.70	0.75	1.27	0.00%	0.02%
Opilio tanner crab*	PSC (ETP)	0.20	0.13	0.00	0.00	0.00	0.07	NA	NA
Other osmerids	Other bycatch	6.62	88.75	1.27	11.45	0.00	21.62	0.02%	0.27%
Pacific cod	Main associated	1,011.31	2,917.09	3,479.04	3,975.07	636.66	2,403.83	1.92%	30.50%
Pacific ocean perch	Main associated	1,130.57	779.00	2,251.67	2,217.57	817.54	1,439.27	1.15%	18.26%
Rattail grenadier, unidentified	Other bycatch	38.55	46.71	58.76	33.74	1.58	35.87	0.03%	0.46%
Red king crab*	PSC (ETP)	5.00	3.00	0.00	0.00	0.51	1.70	NA	NA

Rex sole	Minor associated	100.42	51.00	16.00	66.36	9.53	48.66	0.04%	0.62%
Rock sole	Main associated	66.21	181.09	171.82	241.20	1,452.26	422.52	0.34%	5.36%
Rockfish, unidentified	Other bycatch	0.00	0.00	15.62	0.00	16.95	6.52	0.01%	0.08%
Rougheye rockfish	Minor associated	30.71	39.77	90.02	79.41	13.73	50.73	0.04%	0.64%
Sablefish	Minor associated	794.66	58.00	85.88	96.81	6.90	208.45	0.17%	2.65%
Salmon shark	Minor associated	29.62	42.63	50.19	18.31	138.13	55.78	0.04%	0.71%
Sculpin	Other bycatch	0.27	9.34	16.11	0.00	1.27	5.40	0.00%	0.07%
Sculpin, unidentified	Other bycatch	13.16	0.00	0.00	0.00	0.00	2.63	0.00%	0.03%
Scypho jellies	Other bycatch	5.48	9.75	3.37	12.57	14.81	9.19	0.01%	0.12%
Sea star	Other bycatch	3.26	0.90	0.28	0.24	0.02	0.94	0.00%	0.01%
Shark	Other bycatch	0.35	1.63	1.83	1.07	0.90	1.16	0.00%	0.01%
Sharpchin rockfish	Other bycatch	0.00	0.00	2.35	0.00	16.97	3.87	0.00%	0.05%
Shortraker rockfish	Minor associated	22.85	28.02	115.47	140.23	39.22	69.16	0.06%	0.88%
Skate, unidentified	Other bycatch	2.90	2.84	3.08	3.87	11.89	4.91	0.00%	0.06%
Sleeper shark	Other bycatch	16.50	25.38	23.53	23.74	95.74	36.98	0.03%	0.47%
Smelt (Family Osmeridae)	Minor associated	0.00	240.51	93.21	51.96	117.89	100.71	0.08%	1.28%
Snails	Other bycatch	0.00	0.02	0.00	22.84	0.00	4.57	0.00%	0.06%
Spiny dogfish	Other bycatch	49.02	13.00	5.45	11.99	5.34	16.96	0.01%	0.22%
Sponge, unidentified	Habitat	0.00	0.00	0.01	0.00	0.00	0.00	0.00%	0.00%
Squid	Main associated	371.73	268.82	2,232.42	2,919.77	964.81	1,351.51	1.08%	17.15%
Starry flounder	Other bycatch	2.71	0.24	0.41	0.58	1.95	1.18	0.00%	0.01%
Thornyhead rockfish	Other bycatch	0.45	2.28	1.88	1.60	0.34	1.31	0.00%	0.02%
Turbot	Other bycatch	0.00	0.00	0.00	15.72	6.80	4.51	0.00%	0.06%
Yellow Irish lord	Other bycatch	16.62	0.00	0.00	0.00	0.00	3.33	0.00%	0.04%
Total**		110,589.92	102,745.39	137,797.74	143,961.57	130,371.33	125,093.19		

Notes:
Associated and other bycatch species with percent of total average bycatch of ≤0.00% are not shown in table.

* Number of individuals instead of mt
** Does not include species with individual numbers instead of weight

5.4.2 Habitats and ecosystem

There have been no changes in where the fishery operates, its relative footprint, or how it impacts the habitat and ecosystem. See Fundamental Clause 6.1.4 for more details.

5.5 External factors (such as environmental issues) that may affect the fishery and its management

As stated in previous reports, the effects of environmental variation on production of pollock in the BSAI and GOA have been studied extensively in terms of physical oceanography, ecosystem variability, and fish production. NMFS and the regional offices coordinate the production of a vast amount of new environmental and other information expected to improve groundfish fishery management in Alaska. Several ecosystem-wide oceanographic phenomena have been identified. The Pacific Decadal Oscillation (PDO), with decadal changes in 'warm' and 'cold' phases has been correlated with a number of factors, including sea level pressure, precipitation, and salmon landing in the Pacific Ocean (https://www.fisheries.noaa.gov/feature-story/understanding-ocean-changes-and-climate-just-got-harder).

Groundfish species show interannual variability in recruitment that may be related to El Niño Southern Oscillation driven climate variability. Years of strong onshore transport, typical of warm years in the BS, often corresponds with strong recruitment. The extent and timing of the presence of sea ice in the BS also determines the area where cold bottom water temperatures will persist throughout the following spring and summer. This EBS area of cold water, known as the cold pool, varies with the annual extent and duration of the ice pack and can influence fish distributions.

Past conditions have been an unusually warm phase. In 2014-2016, sea surface temperatures were as much as 3° C (about 5.4° F) higher than average, lasted for months, and appeared on large-scale temperature maps as a red-orange mass of warm water many hundreds of miles across (aka 'the blob'). This appeared to be different from normal patterns of ocean conditions such as the El Niño Southern Oscillation or PDO. Figure 7 show sea surface temperature changes in PDO for 1950-2021.

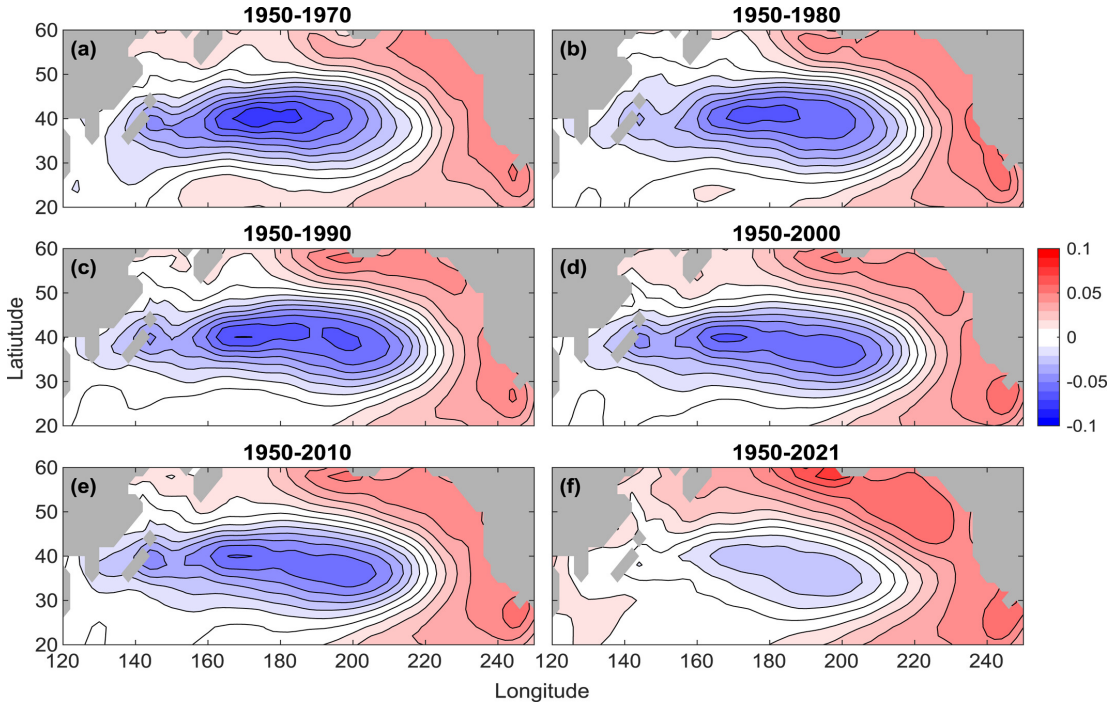

Figure 7. Sea surface temperature changes within PDO for the period 1950-2021. Source: Werb and Rudnick 2023

6 ASSESSMENT OUTCOME SUMMARY / FUNDAMENTAL CLAUSES SUMMARIES

According to the RFM Standard Version 2.1, the following fisheries management issues would cause a fishery to fail assessment:

- Dynamiting, poisoning, and other comparable destructive fishing practices.
- Significant IUU fishing activities in the country jurisdiction.
- Shark finning (i.e., removal and retention of shark fins while the remainder of the shark is discarded in the ocean).
- Slavery and slave labor on board fishing vessels.
- Any significant lack of compliance with the requirements of an international fisheries agreement to which the United States is signatory. A fishery will have to be formally cited by the international governing body that has competence with the international treaty in question and that the United States has been notified of that citation of non-compliance.

As was the case during the second reassessment, there is no evidence that the fishery has undertaken such practices or has been non-compliant. At the last recertification, Supporting Clause 3.1 achieved a score of 7, owing to the lack of long-term management objectives within Alaska state-managed groundfish fisheries. This resulted in a medium confidence rating and application of a minor non-conformity. Prior to the first surveillance audit, action had been undertaken, and evidence was provided by the client that led to the rescoring at 10 of the Supporting Clause and the closing of the non-conformity. Table 9 shows the scores for each supporting clause at recertification and the scoring change. Additional information is provided in the sections below.

Table 9. Scoring table

Key Component	Fundamental Clause	Supporting Clause	Applicable?	Score	Confidence Rating	Conformance Level	NC Number
A – Fisheries Management System	1	1.1	Yes	10	High	Full	
		1.2	Yes	10	High	Full	
		1.2.1	Yes	10	High	Full	
		1.3	Yes	10	High	Full	
		1.3.1	Yes	10	High	Full	
		1.4	Yes	10	High	Full	
		1.4.1	Yes	10	High	Full	
		1.5	Yes	10	High	Full	
		1.6	Yes	10	High	Full	
		1.6.1	No	NA	NA	NA	
		1.7	Yes	10	High	Full	
		1.8	Yes	10	High	Full	
		1.9	No	NA	NA	NA	
	2	2.1	Yes	10	High	Full	
		2.1.1	Yes	10	High	Full	
		2.1.2	Yes	10	High	Full	
		2.2	Yes	10	High	Full	
		2.3	Yes	10	High	Full	
		2.4	Yes	10	High	Full	
		2.5	Yes	10	High	Full	
		2.6	Yes	10	High	Full	
		2.7	Yes	10	High	Full	
	3	3.1	Yes	10	High	Full	
		3.1.1	Yes	10	High	Full	
		3.1.2	Yes	10	High	Full	
		3.1.3	Yes	10	High	Full	
		3.2	NA	NA	NA	NA	
		3.2.1	Yes	10	High	Full	
		3.2.2	Yes	10	High	Full	
B – Science, Stock		3.2.3	Yes	10	High	Full	
		3.2.4	Yes	10	High	Full	

Assessment Activities, and the Precautionary Approach	4	4.1	Yes	10	High	Full	
		4.1.1	Yes	10	High	Full	
		4.1.2	Yes	10	High	Full	
		4.2	Yes	10	High	Full	
		4.2.1	Yes	10	High	Full	
		4.3	Yes	10	High	Full	
		4.4	Yes	10	High	Full	
		4.5	Yes	10	High	Full	
		4.6	Yes	10	High	Full	
		4.7	Yes	10	High	Full	
		4.8	Yes	10	High	Full	
		4.9	No	NA	NA	NA	
		4.10	No	NA	NA	NA	
		4.11	No	NA	NA	NA	
	5	5.1	Yes	10	High	Full	
		5.1.1	Yes	10	High	Full	
		5.1.2	Yes	10	High	Full	
		5.2	Yes	10	High	Full	
		5.3	Yes	10	High	Full	
		5.4	Yes	10	High	Full	
		5.5	Yes	10	High	Full	
	6	6.1	Yes	10	High	Full	
		6.2	Yes	10	High	Full	
		6.3	Yes	10	High	Full	
		6.4	Yes	10	High	Full	
		6.5	Yes	10	High	Full	
	7	7.1	Yes	10	High	Full	
		7.1.1	Yes	10	High	Full	
		7.1.2	Yes	10	High	Full	
		7.2	No	NA	NA	NA	
C – Management Measures, Implementation, Monitoring, and Control	8	8.1	Yes	10	High	Full	
		8.1.1	Yes	10	High	Full	
		8.1.2	Yes	10	High	Full	
		8.2	Yes	10	High	Full	
		8.3	Yes	10	High	Full	
		8.4	Yes	10	High	Full	
		8.4.1	Yes	10	High	Full	
		8.5	Yes	10	High	Full	
		8.5.1	Yes	10	High	Full	
		8.6	Yes	10	High	Full	
		8.7	Yes	10	High	Full	
		8.8	Yes	10	High	Full	
		8.9	Yes	10	High	Full	
		8.10	No	NA	NA	NA	
		8.11	Yes	10	High	Full	
		8.12	Yes	10	High	Full	
		8.13	No	NA	NA	NA	
	9	9.1	Yes	10	High	Full	
		9.2	Yes	10	High	Full	

		9.3	Yes	10	High	Full	
	10	10.1	Yes	10	High	Full	
		10.2	Yes	10	High	Full	
		10.3	No	NA	NA	NA	
		10.3.1	No	NA	NA	NA	
		10.4	No	NA	NA	NA	
		10.4.1	No	NA	NA	NA	
	11	11.1	Yes	10	High	Full	
		11.2	Yes	10	High	Full	
		11.3	Yes	10	High	Full	
		11.4	No	NA	NA	NA	
D – Serious Impacts of the Fishery on the Ecosystem	12	12.1	Yes	10	High	Full	
		12.2	No	NA	NA	NA	
		12.2.1	Yes	10	High	Full	
		12.2.2	Yes	10	High	Full	
		12.2.3	Yes	10	High	Full	
		12.2.4	Yes	10	High	Full	
		12.2.5	Yes	10	High	Full	
		12.2.6	Yes	10	High	Full	
		12.2.7	Yes	10	High	Full	
		12.2.8	Yes	10	High	Full	
		12.2.9	Yes	10	High	Full	
		12.2.10	Yes	10	High	Full	
		12.2.11	Yes	10	High	Full	
		12.3	Yes	10	High	Full	
		12.4	Yes	10	High	Full	
		12.5	Yes	10	High	Full	
		12.6	Yes	10	High	Full	
		12.7	Yes	10	High	Full	
	13	13.1	No	NA	NA	NA	
		13.1.1	No	NA	NA	NA	
		13.2	No	NA	NA	NA	
		13.2.1	No	NA	NA	NA	
		13.3	No	NA	NA	NA	
		13.4	No	NA	NA	NA	
		13.5	No	NA	NA	NA	
		13.6	No	NA	NA	NA	
		13.7	No	NA	NA	NA	
		13.7.1	No	NA	NA	NA	
		13.7.2	No	NA	NA	NA	
		13.7.3	No	NA	NA	NA	
		13.8	No	NA	NA	NA	
		13.9	No	NA	NA	NA	
		13.10	No	NA	NA	NA	
		13.11	No	NA	NA	NA	
		13.12	No	NA	NA	NA	
		13.13	No	NA	NA	NA	

6.1 Update on consistency with Fundamental Clauses

6.1.1 Key Component A: The Fisheries Management System

Fundamental Clause 1. There shall be a structured and legally mandated management system based upon and respecting international, State, and local fishery laws, for the responsible utilization of the stock under consideration and conservation of the marine environment.	
1.1 There shall be an effective legal and administrative framework established at international, State and local levels appropriate for fishery resource conservation and management. The management system and the fishery operate in compliance with the requirements of international, State, and local laws and regulations, including the requirements of any regional and/or international fisheries management agreement. 1.2 Management measures shall consider (1) stock status (i.e., overfished, biomass) and genetic diversity (stock structure) over its entire area of distribution, and (2) other biological characteristics of the fish stock (stock) including age of maturity and reproductive potential. 1.2.1 Previously agreed management measures established and applied in the same region is region shall be taken into account by management. 1.3 Where transboundary, shared, straddling, highly migratory, or high seas stocks are exploited by two or more States (neighboring or not), the applicant and appropriate management organizations concerned shall cooperate and take part in the formal fishery commission or arrangements appointed to ensure effective conservation and management of the stock(s) in question and their environment. 1.3.1 Conservation and management measures established for the *stock under consideration* within the jurisdiction of the relevant States for transboundary, shared, straddling, highly migratory, or high seas stocks, shall be compatible in a manner consistent with the rights, competence, and interests of the States concerned. 1.4 A State's fishery management organization not member or participant of a sub-regional or regional fisheries management organization shall cooperate, in accordance with relevant international agreements and law, in the conservation and management of the relevant fisheries resources by giving effect to any relevant measures adopted by such organization or arrangement. 1.4.1 A fishery management organization seeking to take any action through a non-fishery organization which may affect the conservation and management measures taken by a competent sub-regional or regional fisheries management organization or arrangement shall consult with the latter, in advance to the extent practicable, and take its views into account. 1.5 The applicant's fishery management system, when appropriate for the *stock under consideration*, shall actively foster cooperation between States with regard to (1) information gathering and exchange, (2) fisheries research, (3) fisheries management, and (4) fisheries development. 1.6 A fishery management organization and sub-regional or regional fisheries management organizations and arrangements, as appropriate, shall agree on the means by which the activities of such organizations and arrangements will be financed, bearing in mind, *inter alia*, the relative benefits derived from the fishery and the differing capacities of States to provide financial and other contributions. Where appropriate, and when possible, such organizations and arrangements shall aim to recover the costs of fisheries conservation, management, and research. 1.6.1 Without prejudice to relevant international agreements, States or fishery management organizations shall encourage banks and financial institutions not to require, as a condition of a loan or mortgage, fishing vessels or fishing support vessels to be flagged in a jurisdiction other than that of the State of beneficial ownership where such a requirement would have the effect of increasing the likelihood of non-compliance with international conservation and management measures. 1.7 Within the fishery management system, procedures shall be in place to keep the efficacy of current conservation and management measures and their possible interactions under continuous review, and to revise or abolish them in the light of new information. 1.8 The management arrangements and decision-making processes for the fishery shall be organized in a transparent manner. 1.9 Management organizations not party to the Agreement to Promote Compliance with International Conservation and Management Measures by Vessels Fishing in the High Seas shall be encouraged to accept the Agreement and to adopt laws and regulations consistent with the provisions of the Agreement.	
Summary of relevant changes	**Clause 1.6** The NPFMC April Newsletter notes that the Council's SSC have reviewed several AFSC survey-related aspects including the existing AFSC organizational structure, current fishery resource and ecosystem surveys, their spatial coverage and frequency, and the current AFSC modernization efforts and prioritization of surveys, and survey impacts to data streams. The SSC acknowledged the high degree of uncertainty in

	future federal funding for surveys, and the loss of staff and expertise that has already occurred in 2025 and emphasized that both will have substantive impacts on the information and data produced from the AFSC surveys that inform federal fisheries management in the North Pacific. A core set of surveys were identified, including bottom trawl surveys in EBS, GOA, and AI, acoustic surveys in EBS and Shelikof Strait, and the longline survey, which are essential to support the stock assessments that underpin sustainable fisheries management in the North Pacific. Additional suggestions for consideration of data streams and potential impacts on assessments are contained in the SSC minutes. **Clauses 1.1, 1.3, 1.3.1, 1.4, and 1.7** No changes were reported with respect to bi-lateral cooperation between the United States and Russia and, in particular, the Intergovernmental Consultative Committee Fisheries Forum Agreement and The Convention on the Conservation and Management of Pollock Resources in the Central Bering Sea ('The Donut Hole'). As indicated at the last surveillance, the audit team concluded that the changes in international cooperation provided by the Intergovernmental Consultative Committee are clearly beyond the control of the client and/or the responsible fishery management organizations and are unlikely to compromise the sustainable management of the pollock resource owing to the way the existing scientific monitoring and management approach are implemented by the U.S. fishery management organizations (i.e., separate stock assessments and management units). **Clause 1.2, 1.2.1, 1.7, 1.8** No relevant changes were reported. **Clause 1.6.1 and 1.9** Not applicable
References	NPFMC Newsletter, April 2025, https://www.npfmc.org/april-2025-newsletter/ Scientific and Statistical Committee Draft Report to the North Pacific Fisheries Management Council, March 31 April 1 2025. https://meetings.npfmc.org/CommentReview/DownloadFile?p=d7cd81d1-1ffa-480b-97d7-fb93ab611f8b.pdf&fileName=DRAFT%20SSC%20Report.pdf
Summary of consistency with RFM Fisheries Standard	The fishery continues to meet the requirements of this Fundamental Clause of the RFM Fisheries Standard.

Fundamental Clause 2. Management organizations shall participate in coastal area management, decision making processes and activities related to the fishery and its users, supporting sustainable and integrated resource use, and conflict avoidance.	
2.1 Within the fisheries management organization's jurisdiction, an appropriate policy, legal, and institutional framework shall be adopted in order to achieve sustainable and integrated use of living marine resources, (1) taking into account the fragility of coastal ecosystems and finite nature of their natural resources, (2) allowing for determination of the possible uses of coastal resources and governing access to them, and (3) recognizing the rights and needs of coastal communities and their customary practices to the extent compatible with sustainable development. In setting policies for the management of coastal areas, States shall take due account of the risks and uncertainties involved. 2.1.1 States shall establish mechanisms for cooperation and coordination in planning, development, conservation, and management of coastal areas. 2.1.2 The fisheries management organization shall ensure that the authority or authorities representing the fisheries sector and fishing communities in the coastal management process have the appropriate technical capacities and financial resources. 2.2 Representatives of the fisheries sector and fishing communities shall be consulted in the decision-making processes involving activities related to coastal area management planning and development. The public, as well as others affected, shall also be kept aware of the need for protection and management of coastal resources, and shall participate in the coastal management process. 2.3 Fisheries practices that avoid conflict among fishers and other users of the coastal area (e.g., fisheries enhancement facilities, tourism, energy) shall be adopted, and fishing shall be regulated in such a way as to avoid risk of conflict among fishers using different vessels, gear, and fishing methods. Procedures and mechanisms shall be established at the appropriate administrative level to settle conflicts that arise within the fisheries sector and between fisheries resource users and other coastal users. 2.4 States' fisheries management organizations and sub-regional or regional fisheries management organizations and arrangements shall give due publicity to conservation and management measures and ensure that laws, regulations, and other legal rules governing their implementation are effectively disseminated. The bases and purposes of such measures shall be explained to users of the resource in order to facilitate their application and thus gain increased support in the implementation of such measures. 2.5 The economic, social, and cultural value of coastal resources shall be assessed by the appropriate fisheries management organization in order to assist decision making on their allocation and use. 2.6 States shall cooperate to support and improve coastal area management, and in accordance with capacities, measures shall be taken to establish or promote (1) systems for research and monitoring of the coastal environment, and (2) multidisciplinary research of the coastal area using physical, chemical, biological, economic, social, legal, and institutional capabilities. 2.7 In the case of a States' activities that may have an adverse environmental effect on coastal areas of other States, States shall provide timely information and if possible, prior notification to potentially affected States, and consult with those States as early as possible.	
Summary of relevant changes	**Clause 2.1, 2.1.1, 2.1.2, 2.2, 2.3.** In January 2024, NMFS updated its EBFM Policy (2024), which provides the background, definition, rationale, and legislative context for implementing EBFM under relevant mandates. In September 2024, NMFS released the 2024 revised EBFM Road Map, which provides specific actions under each goal identified in the EBFM Policy that will guide the Council's efforts to implement the Policy over the next five years. This includes specific actions aimed at advancing climate-ready decision-making, which includes climate-informed science and management for trust resources and habitats. NMFS revised the Road Map to incorporate ideas and comments from fishery management councils, including NPFMC. NMFS agrees with the NPFMC's principle comment on the importance of at-sea surveys to fisheries science and management; that idea is already part of the guiding documents and the EBFM Road Map. NMFS also revised the Road Map based on comments received from Alaska fisheries interests, including Alaska Native communities and organizations. **Clause 2.4, 2.5, 2.6** As reported at last year's audit, the NPFMC had initiated a Programmatic Evaluation (i.e., a review of its management policies, goals, and objectives for all federally managed fisheries in the BSAI and GOA with the intent of ensuring the Council's management framework is adequate to address current and future challenges, including climate change, and to improve the council's ecosystem-based management

	approach). At the April 2025 Council, it was to pause the process, given the uncertainty regarding forthcoming changes to NMFS' priorities, funding, and other resources. **Clause 2.7** No relevant changes were reported.
References	EBFM Policy, Ecosystem-Based Fisheries Management Policy of the National Marine Fisheries Service National Oceanic and Atmospheric Administration, Policy Statement, January 2024. https://www.fisheries.noaa.gov/s3/2024-02/Revised-EBFM-Policy-FINAL-2.12.24-508-signed-JC.pdf Ecosystem-Based Fisheries Management Road Map. https://www.fisheries.noaa.gov/resource/document/ecosystem-based-fisheries-management-road-map NPFMC Newsletter, April 2025, https://www.npfmc.org/april-2025-newsletter/
Summary of consistency with RFM Fisheries Standard	The fishery continues to meet the requirements of this Fundamental Clause of the RFM Fisheries Standard.

Fundamental Clause 3. Management objectives shall be implemented through management rules and actions formulated in a plan or other framework.	
3.1 Long-term management objectives shall be translated into a plan or other management document (taking into account uncertainty and imprecision) and be subscribed to by all interested parties. 3.1.1 There shall be management objectives seeking to ensure that ETP species are protected from adverse impacts resulting from interactions with the unit of certification and any fisheries enhancement activity, including recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible. 3.1.2 There shall be management objectives seeking to avoid, minimize, or mitigate impacts of the unit of certification on the *stock* under consideration's essential habitats, and on habitats that are highly vulnerable to damage by the unit of certification's fishing gear. 3.1.3 There shall be management objectives seeking to minimize adverse impacts of the unit of certification (including any fishery enhancement) on the structure, and function of the ecosystems that are likely to be irreversible or very slowly reversible. 3.2 Management measures shall provide, *inter alia,* that: 3.2.1 Excess fishing capacity shall be avoided, and exploitation of the stocks shall remain economically viable. 3.2.2 The economic conditions under which fishing industries operate shall promote responsible fisheries. 3.2.3 The interests of fishers, including those engaged in subsistence, small-scale, and artisanal fisheries shall be taken into account. 3.2.4 Biodiversity of aquatic ecosystems shall be conserved and ETP species shall be protected. Where relevant, there shall be management objectives, and as necessary, management measures.	
Summary of relevant changes	**Clause 3.1, 3.1.1, 3.1.2, 3.1.3, 3.2, 3.2.1, 3.2.2, 3.2.3, 3.2.4** No relevant changes were reported.
References	NA
Summary of consistency with RFM Fisheries Standard	The fishery continues to meet the requirements of this Fundamental Clause of the RFM Fisheries Standard.

6.1.2 Key Component B: Science and Stock Assessment Activities, and the Precautionary Approach

Fundamental Clause 4. There shall be effective fishery data (dependent and independent) collection and analysis systems for stock management purposes.	
4.1 All significant fishery removals and mortality of the target species (shall be considered by management. Specifically, reliable and accurate data required for assessing the status of fishery(ies) and ecosystems—including data on retained catch, bycatch, discards, and waste—shall be collected. Data can include relevant traditional, fisher, or community knowledge, provided their validity can be objectively verified. These data shall be collected, at an appropriate time and level of aggregation, by relevant management organizations connected with the fishery, and provided to relevant States regional, and international fisheries organizations. 4.1.1 Timely, complete, and reliable statistics shall be compiled on catch and fishing effort and maintained in accordance with applicable international standards and practices, and in sufficient detail to allow sound statistical analysis for stock assessment. Such data shall be updated regularly and verified through an appropriate system. The use of research results as a basis for setting management objectives, reference points, and performance criteria, as well as for ensuring adequate linkage between applied research and fisheries management (e.g., adoption of scientific advice) shall be promoted. Results of analysis shall be distributed accordingly as a contribution to fisheries conservation, management, and development. 4.1.2 In the absence of specific information on the *stock under consideration*, generic evidence based on similar stocks can be used. However, the greater the risk of overfishing, the more specific evidence is necessary to ascertain the sustainability of intensive fisheries. 4.2 An observer scheme designed to collect accurate data for research and support compliance with applicable fishery management measures shall be established. 4.2.1 Where necessary, fisheries management organizations and regional fisheries management organizations and other such arrangements should strive to achieve a level and scope of observer programs sufficient to provide quantitative estimates of total catch, discards, and incidental takes of living aquatic resources. 4.3 A fisheries management organization, regional fisheries management organizations or arrangements shall compile data and make them available, in a manner consistent with any applicable confidentiality requirements, in a timely manner and in an agreed format to all members of these organizations and other interested parties in accordance with agreed procedures. 4.4 States shall stimulate the research required to support policies related to fish as food. 4.5 There shall be sufficient knowledge of the economic, social, marketing, and institutional aspects of fisheries collected through data gathering, analysis, and research, as well as comparable data generated for ongoing monitoring, analysis, and policy formulation. 4.6 The fisheries management organization shall investigate and document traditional fisheries knowledge and technologies—in particular those applied to small-scale fisheries—in order to assess their application to sustainable fisheries conservation, management, and development. 4.7 If a fisheries management organization is conducting scientific research activities in waters of another State, it shall ensure that their vessels comply with the laws and regulations of that State and international law. 4.8 Adoption of uniform guidelines governing fisheries research conducted on the high seas shall be promoted and, where appropriate, support the establishment of policies that include, *inter alia*, facilitating research at the international and sharing the research results with affected States. 4.9 If appropriate, the fisheries management organization and relevant international organizations shall promote and enhance the research capacities of developing countries, *inter alia*, in the areas of data collection and analysis, information, science and technology, human resource development, and provision of research facilities, in order for them to participate effectively in the conservation, management, and sustainable use of living aquatic resources. 4.10 Competent national organizations shall, where appropriate, render technical and financial support to States upon request and when engaged in research investigations aimed at evaluating stocks which have been previously unfished or very lightly fished. 4.11 Relevant technical and financial international organizations shall, upon request, support States in their research efforts, devoting special attention to developing countries—in particular the least developed among them and small developing island countries.	
Summary of relevant changes	In the Alaska pollock fishery, no substantive changes have been introduced in the core data collection and analysis systems supporting stock management. This stability has been verified both through stakeholder input during the site visit and in the latest Stock Assessment and Fishery Evaluation (SAFE) reports covering EBS (Ianelli et al., 2024), AI (Barbeaux et al., 2024), and GOA (Monnahan et al., 2024).

	The Alaska pollock fishery continues to operate under one of the most comprehensive fishery monitoring and data collection frameworks globally. This includes extensive use of Vessel Monitoring Systems (VMS) and mandatory observer coverage on all pollock vessels since 2011, ensuring near 100% observer monitoring coverage (Ianelli et al., 2024). Recently, EM systems have been increasingly adopted on shore-based catcher vessels, with biological sampling maintained at historical levels through dockside monitoring (Ianelli et al., 2024). Fishery-independent data collection has remained a cornerstone of stock assessment, with long-term, systematic surveys such as the Bottom Trawl Survey, Acoustic-Trawl Survey, and Acoustic Vessels of Opportunity continuing to provide essential biomass and age structure data (Ianelli et al., 2024; Monnahan et al., 2024). These surveys have been consistently implemented with robust methodologies, including spatio-temporal modeling (e.g., VAST) to standardize indices and improve trend reliability (Ianelli et al., 2024). Recent updates in 2024 have integrated the latest survey and catch data without altering the established analytical frameworks (Barbeaux et al., 2024; Monnahan et al., 2024). In the AI region, the Aleutian Islands Cooperative Acoustic Survey Study continues to demonstrate the feasibility of using industry vessels for acoustic biomass assessments, although results underscore the need for adaptive management due to spatial variability in pollock distribution (Barbeaux et al., 2024). Similarly, in the GOA, the 2024 assessment incorporated updated catch, acoustic survey, and bottom trawl survey data while maintaining the assessment model structure used in prior years. The introduction of refined data weighting and continued application of the Dirichlet-multinomial likelihood for age compositions improved model performance without altering the underlying methodology (Monnahan et al., 2024). All data collection activities, including fishery-dependent and fishery-independent sources, continue to align with the principles and requirements of the Magnuson-Stevens Fisheries Management and Conservation Act. Changes to data collection or analysis methods are subject to rigorous peer review by the Plan Teams, SSC, and NPFMC, ensuring that modifications enhance, rather than compromise, scientific integrity and stock assessment reliability (Ianelli et al., 2024; Barbeaux et al., 2024; Monnahan et al., 2024). In summary, the Alaska pollock fishery maintains a high standard of data collection and analysis, with no substantive methodological changes introduced in 2024. The ongoing application of robust, peer-reviewed methods ensures reliable stock assessments, supporting sustainable management consistent with national and international best practices.
References	Barbeaux, S. J., Ianelli, J., Ortiz, I., Laman, N., and Spies, I. 2024. Assessment of the pollock stock in the Aleutian Islands. North Pacific Fishery Management Council, Anchorage, AK. https://www.npfmc.org/wp-content/PDFdocuments/SAFE/2024/AIpollock.pdf. Ianelli, J., Honkalehto, T., Wasserman, S., Lauffenburger, N., McGilliard, C., and Siddon, E. 2024a. Assessment of walleye pollock in the eastern Bering Sea. North Pacific Fishery Management Council, Anchorage, AK. https://www.npfmc.org/wp-content/PDFdocuments/SAFE/2024/EBSpollock.pdf. Monnahan, C. C., Ferriss, B. E., Shotwell, S. K., Oyafuso, Z., Levine, M., Thorson, J. T., Rogers, L., Sullivan, J., and Champagnat, J. 2024. North Pacific Fishery Management Council, Anchorage, AK. https://www.npfmc.org/wp-content/PDFdocuments/SAFE/2024/GOApollock.pdf.
Summary of consistency with RFM Fisheries Standard	The fishery continues to meet the requirements of this Fundamental Clause of the RFM Fisheries Standard.

Fundamental Clause 5. There shall be regular stock assessment activities appropriate for the fishery, its range, the species biology, and the ecosystem, undertaken in accordance with acknowledged scientific standards to support its optimum utilization.	
5.1 An appropriate institutional framework shall be established to determine the applied research required and its proper use (i.e., assess/evaluate stock assessment model/practices) for fishery management purposes. 5.1.1 Less elaborate stock assessment methods are frequently used for small-scale or low-value capture fisheries resulting in greater uncertainty about the status of the *stock under consideration*. A more precautionary approach to managing fisheries on such resources shall be required, including, where appropriate, a lower level of resource utilization. A record of good management performance may be considered as supporting evidence of the adequacy of the management system. 5.1.2 The fisheries management organization shall ensure that appropriate research is conducted into all aspects of fisheries including biology, ecology, technology, environmental science, economics, and fishery enhancement. Analysis results shall be distributed in a timely and readily understandable fashion in order that the best scientific evidence available contributes to fisheries conservation, management, and development. The fisheries management organization shall also ensure the availability of research facilities and provide appropriate training, staffing, and institution building to conduct the research. 5.2 There shall be established research capacity necessary to assess and monitor (1) the effects of climate or other environmental change on stocks and aquatic ecosystems, (2) the status of the stock under State jurisdiction, and (3) the impacts of ecosystem changes resulting from fishing activity, pollution, or habitat alteration. 5.3 Management organizations shall cooperate with relevant international organizations to encourage research in order to ensure optimum utilization of fishery resources. 5.4 The fishery management organizations shall directly, or in conjunction with other States, develop collaborative technical and research programs to improve understanding of the biology, environment, and status of transboundary, shared, straddling, highly migratory and high seas stocks. 5.5 Data generated by research shall be analyzed and the results of such analyses published in a way that ensures confidentiality is respected, where appropriate.	
Summary of relevant changes	Information for assessing the status of Alaska pollock (*Gadus chalcogrammus*) comes from the annual SAFE reports prepared by NOAA Fisheries and reviewed by NPFMC for the three recognized stocks: EBS (Ianelli et al., 2024), AI (Barbeaux et al., 2024), and GOA (Monnahan et al., 2024). Detailed analyses and model outputs for each stock are presented in Sections 5.1 and 5.2 of this report. Across all regions, stock assessment activities have been maintained without significant methodological disruptions. The assessment process continues to apply integrated, peer-reviewed models that account for the species' biology, distribution, and behavior. These models are informed by multiple data sources, including: • Bottom trawl surveys (e.g., EBS and GOA surveys conducted by NMFS's AFSC) • Acoustic-trawl surveys (e.g., Shelikof Strait and EBS midwater surveys) • Observer catch and biological data • Fishery-independent surveys using vessels of opportunity (e.g., Acoustic Vessels of Opportunity data in EBS and AI) • Genetic analyses supporting stock structure differentiation The stock assessment methodology is robust and conforms to internationally recognized best practices as outlined by NPFMC. These practices ensure transparency, scientific rigor, and independent peer review. The assessments integrate biological processes such as age-structured population dynamics, recruitment variability, natural mortality, and fishing mortality using models such as ADMB-based AMAK (for AI), statistical age-structured models (for EBS), and Dirichlet-multinomial likelihood frameworks (for GOA). Ecosystem considerations remain central to these assessments. They include evaluations of prey availability, predator-prey interactions (notably with Steller sea lions and other marine mammals), and environmental conditions such as ocean temperature anomalies and the extent of the Bering Sea cold pool. For example, the EBS assessment explicitly incorporates spatio-temporal modeling to capture distributional shifts linked to environmental drivers (Ianelli et al., 2024). Similarly, the GOA assessment explores ecosystem linkages through recruitment-environment relationships modeled via dynamic structural equation models (Monnahan et al., 2024, Appendix 1E).

	Management advice derived from these assessments remains precautionary. All three stocks are currently not overfished and not subject to overfishing, with biomass levels above their respective biological reference points (B20% or B35%). For example: • EBS pollock remains in Tier 1a, with spawning biomass in 2025 projected at 3.1 million t, well above BMSY (2.31 million t), supporting a maximum ABC of 3.7 million t (Ianelli et al., 2024). • AI pollock assessments indicate stabilization and a biomass increase in recent years, though recruitment remains highly uncertain (Barbeaux et al., 2024). • GOA pollock remains in Tier 3a, with a 2025 spawning biomass projection of 243,078 t, above B40% (214,000 t), supporting an ABC of 181,022 t (Monnahan et al., 2024). In addition to stock-specific management, measures such as time-area closures, bycatch reduction programs (e.g., for Chinook salmon and sablefish), and ecosystem-based management approaches are actively applied. The Steller sea lion protection measures, in particular, continue to influence spatial and seasonal fishery allocations in both the EBS and GOA. Collaboration remains a critical element in the success of these assessments. Active partnerships between NOAA Fisheries, industry stakeholders, academic researchers, and the NPFMC Plan Teams ensure continuous data collection, model improvements, and adaptive management. This cooperative framework ensures that stock assessments remain scientifically credible and aligned with ecosystem-based management objectives.
References	Barbeaux, S. J., Ianelli, J., Ortiz, I., Laman, N., and Spies, I. 2024. Assessment of the pollock stock in the Aleutian Islands. North Pacific Fishery Management Council, Anchorage, AK. https://www.npfmc.org/wp-content/PDFdocuments/SAFE/2024/AIpollock.pdf. Ianelli, J., Honkalehto, T., Wasserman, S., Lauffenburger, N., McGilliard, C., and Siddon, E. 2024a. Assessment of walleye pollock in the eastern Bering Sea. North Pacific Fishery Management Council, Anchorage, AK. https://www.npfmc.org/wp-content/PDFdocuments/SAFE/2024/EBSpollock.pdf. Monnahan, C. C., Ferriss, B. E., Shotwell, S. K., Oyafuso, Z., Levine, M., Thorson, J. T., Rogers, L., Sullivan, J., and Champagnat, J. 2024. North Pacific Fishery Management Council, Anchorage, AK. https://www.npfmc.org/wp-content/PDFdocuments/SAFE/2024/GOApollock.pdf.
Summary of consistency with RFM Fisheries Standard	The fishery continues to meet the requirements of this Fundamental Clause of the RFM Fisheries Standard.

Fundamental Clause 6. The current state of the stock shall be defined in relation to reference points, relevant proxies, or verifiable substitutes that allow effective management objectives and targets to be set. Remedial actions shall be available and taken where reference points or other suitable proxies are approached or exceeded.	
6.1 The fishery management organization shall establish safe target reference point(s) for management. Management targets are consistent with achieving maximum sustainable yield (MSY), a suitable proxy, or a lesser fishing mortality—if that is optimal in the circumstances of the fishery (e.g., multispecies fisheries) or is needed to avoid adverse impacts on dependent predators. 6.2 The fishery management organization shall establish appropriate limit reference point(s) for exploitation (i.e., consistent with avoiding recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible; RFM v2.1 Guidance Appendix 1, Part 1[2]). When a limit reference point is approached, measures shall be taken to ensure that it will not be exceeded. For instance, if fishing mortality (or its proxy) is above the associated limit reference point, actions should be taken to decrease the fishing mortality (or its proxy) below that limit reference point. 6.3 Data and assessment procedures that measure the position of the fishery in relation to the reference points shall be established. Accordingly, the *stock under consideration* shall not be overfished (i.e., above limit reference point or proxy) and the level of fishing permitted shall be commensurate with the current state of the fishery resources, maintaining its future availability, and taking into account that long-term changes in productivity can occur due to natural variability and/or impacts other than fishing (RFM v2.1 Guidance Appendix 1, Part 1[3]). 6.4 Accordingly, contingency plans shall be agreed in advance to allow an appropriate management response to serious threats to the resource as a result of overfishing, adverse environmental changes, or other phenomena that may have adverse impacts on the fishery resource (RFM v2.1 Guidance Appendix 1, Part 2[4]). Such measures may be temporary and shall be based on best scientific evidence available. 6.5 Measures shall be introduced to identify and protect depleted stocks and those stocks threatened with depletion, and to facilitate the sustained recovery/restoration of such stocks. Also, efforts shall be made to ensure that resources and habitats critical to the well-being of such stocks, which have received adverse impacts by fishing or other human activities, are restored.	
Summary of relevant changes	Based on the 2024 SAFE reports for EBS, AI, and GOA, the status of Alaska pollock stocks remains positive, with biomass above reference levels and exploitation rates below overfishing thresholds for all three stocks. EBS pollock: According to Ianelli et al. (2024), the EBS pollock stock continues to be highly productive, supported by the strong 2018-year class. The stock is managed under Tier 1a, with female spawning biomass projected at 3.12 million t for 2025, well above the BMSY reference of 2.31 million t. Fishing mortality remains below fishing mortality for OFL, and overfishing is not occurring. The stock is neither overfished nor approaching an overfished condition, with ABC and OFL values of 2.42 million t and 4.38 million t, respectively, for 2025. Management scenarios indicate stability and sustainable exploitation rates under both Tier 1 and Tier 3 classification. AI pollock: The AI pollock stock, assessed by Barbeaux et al. (2024), shows a biomass increase of 49% from 2022 to 2024, despite historical fluctuations driven by recruitment variability and environmental conditions. The stock remains above B20% and is not subject to overfishing, with low exploitation rates in recent years. The assessment uses the AMAK model, consistent since 2015, and shows the population recovering from historic lows observed in the early 2000s. Management continues to account for the unique ecological and genetic characteristics of the AI stock, ensuring precautionary harvest strategies. GOA pollock: Monnahan et al. (2024) report that the GOA pollock stock is in sub-tier "a" of Tier 3, with female spawning biomass for 2025 projected at 243,078 t, above the B40% threshold of 214,000 t. The recommended 2025 ABC is 181,022 t, with an OFL of 210,111 t. Recent biomass increases were supported by the 2020 and 2017 year-classes. The stock is not overfished, and overfishing is not occurring. The assessment integrates new survey data and confirms that management measures remain effective in maintaining the stock above conservation thresholds.

[2] Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America (v2.1)
[3] Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America (v2.1)
[4] Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America (v2.1)

	The latest assessments confirm that all three Alaska pollock stocks are in a safe biological condition with biomass levels above reference points and exploitation rates below OFLs. Continued monitoring and the application of precautionary, science-based management strategies ensure the sustainability of these ecologically and economically important stocks.
References	Barbeaux, S. J., Ianelli, J., Ortiz, I., Laman, N., and Spies, I. 2024. Assessment of the pollock stock in the Aleutian Islands. North Pacific Fishery Management Council, Anchorage, AK. https://www.npfmc.org/wp-content/PDFdocuments/SAFE/2024/AIpollock.pdf. Ianelli, J., Honkalehto, T., Wasserman, S., Lauffenburger, N., McGilliard, C., and Siddon, E. 2024a. Assessment of walleye pollock in the eastern Bering Sea. North Pacific Fishery Management Council, Anchorage, AK. https://www.npfmc.org/wp-content/PDFdocuments/SAFE/2024/EBSpollock.pdf. Monnahan, C. C., Ferriss, B. E., Shotwell, S. K., Oyafuso, Z., Levine, M., Thorson, J. T., Rogers, L., Sullivan, J., and Champagnat, J. 2024. North Pacific Fishery Management Council, Anchorage, AK. https://www.npfmc.org/wp-content/PDFdocuments/SAFE/2024/GOApollock.pdf.
Summary of consistency with RFM Fisheries Standard	The fishery continues to meet the requirements of this Fundamental Clause of the RFM Fisheries Standard.

Fundamental Clause 7. Management actions and measures for the conservation of stock and the ecosystem shall be based on the precautionary approach. Where information is deficient a suitable method using risk management shall be adopted to consider uncertainty.	
7.1 The precautionary approach shall be applied widely to conservation, management, and exploitation of ecosystems to protect them and preserve the ecosystem. This should take due account of fishery enhancement procedures, where appropriate. Absence of scientific information shall not be used as a reason for postponing or failing to take conservation and management measures. Relevant uncertainties shall be taken into account through a suitable method of risk management, including those associated with the use of introduced or translocated species.[5] 7.1.1 In implementing the PA, the fishery management organization shall take into account, *inter alia*, uncertainties relating to the size and productivity of the stocks, reference points, stock condition in relation to such reference points, levels and distribution of fishing mortality, the impact of fishing activities (including discards) on non-target and associated or dependent predators, and environmental and socioeconomic conditions. 7.1.2 In the absence of adequate scientific information, appropriate research shall be initiated in a timely fashion. 7.2 In the case of new or exploratory fisheries, the fishery management organization shall adopt, as soon as possible, cautious conservation and management measures, including, *inter alia*, catch limits and effort limits. Such measures should remain in force until there are sufficient data to allow assessment of the impact of the fisheries on the long-term sustainability of the stocks, whereupon conservation and management measures based on that assessment should be implemented. Management measures should, if appropriate, allow for the gradual development of the fisheries.	
Summary of relevant changes	The Alaska pollock fishery continues to operate under a comprehensive and precautionary management framework, which remains unchanged in its key components as evidenced by the latest 2024 SAFE assessments for EBS (Ianelli et al., 2024), AI (Barbeaux et al., 2024), and GOA (Monnahan et al., 2024). These assessments confirm that management continues to apply well-defined, precautionary measures based on the best available science, with no reported deviations in the application of established conservation and management actions. The precautionary approach remains the foundation of fisheries management in Alaska, requiring proactive strategies to prevent overfishing and mitigate ecosystem impacts in the face of scientific uncertainties. This approach is reflected in the implementation of harvest control rules based on biological reference points such as B20%, B35%, and B40%, which are regularly evaluated and updated based on the latest stock assessments. In all three management regions, pollock stocks are currently assessed as not overfished and not subject to overfishing: • EBS: The stock remains well above BMSY, supported by strong recruitment from the 2018 year class. ABC and OFL values continue to be set using Tier 1 or Tier 3 control rules, ensuring conservative harvest limits (Ianelli et al., 2024). • AI: The stock is stable and has recovered from historical low levels, with management continuing to apply measures to protect Steller sea lions and other ecosystem components, as well as conservative catch limits set below the overfishing threshold (Barbeaux et al., 2024). • GOA: The stock is managed under Tier 3a control rules, with recent assessments recommending no reduction from the maximum permissible ABC, supported by stable biomass projections and favorable environmental conditions (Monnahan et al., 2024). Key management measures include: • Catch Limits: Annual catch limits, ABCs, and OFLs are set following scientific advice from NPFMC and its SSC, based on rigorous stock assessments and ecosystem considerations. • Observer and Monitoring Programs: High levels of monitoring through observer coverage and EM ensure accurate data collection on catch, bycatch, and fishing effort, supporting real-time management (Ianelli et al., 2024; Monnahan et al., 2024). • Spatial and Temporal Closures: Measures such as Steller sea lion protection zones, habitat closures, and seasonal apportionments continue to distribute fishing effort to reduce localized depletion and ecosystem impacts (Barbeaux et al., 2024; Ianelli et al., 2024). • Bycatch Management: Ongoing efforts to minimize bycatch of prohibited species such as Chinook salmon include incentive-based programs, sector-specific caps, and cooperative management

[5] FAO Technical Guidelines for Responsible Fisheries No. 2 – Precautionary approach to capture fisheries and species introductions. http://www.fao.org/docrep/003/w3592e/w3592e00.htm

	agreements, which have proven effective in reducing bycatch risks (Ianelli et al., 2024; Monnahan et al., 2024). No deficiencies have been identified in the risk management procedures or the application of the precautionary approach across any of the three management areas. Instead, the continued alignment with international best practices, robust peer-reviewed stock assessments, and transparent stakeholder engagement further strengthen the fishery's governance framework. Stakeholders, including scientific experts, industry representatives, and regulatory agencies, continue to collaborate through structured processes such as the NPFMC meetings, Plan Team reviews, and SSC evaluations. This collaborative approach ensures that management measures are scientifically justified, ecosystem-based, and responsive to new information. In conclusion, the Alaska pollock fishery maintains a precautionary and adaptive management framework that effectively addresses stock sustainability and ecosystem health. The ongoing application of science-based measures and stakeholder engagement continues to support the long-term viability of the fishery and its dependent communities.
References	Barbeaux, S. J., Ianelli, J., Ortiz, I., Laman, N., and Spies, I. 2024. Assessment of the pollock stock in the Aleutian Islands. North Pacific Fishery Management Council, Anchorage, AK. https://www.npfmc.org/wp-content/PDFdocuments/SAFE/2024/AIpollock.pdf. Ianelli, J., Honkalehto, T., Wasserman, S., Lauffenburger, N., McGilliard, C., and Siddon, E. 2024a. Assessment of walleye pollock in the eastern Bering Sea. North Pacific Fishery Management Council, Anchorage, AK. https://www.npfmc.org/wp-content/PDFdocuments/SAFE/2024/EBSpollock.pdf. Monnahan, C. C., Ferriss, B. E., Shotwell, S. K., Oyafuso, Z., Levine, M., Thorson, J. T., Rogers, L., Sullivan, J., and Champagnat, J. 2024. North Pacific Fishery Management Council, Anchorage, AK. https://www.npfmc.org/wp-content/PDFdocuments/SAFE/2024/GOApollock.pdf.
Summary of consistency with RFM Fisheries Standard	The fishery continues to meet the requirements of this Fundamental Clause of the RFM Fisheries Standard.

6.1.3 Key Component C: Management Measures, Implementation, Monitoring, and Control

Fundamental Clause 8. Management shall adopt and implement effective management measures designed to maintain stocks at levels capable of producing maximum sustainable yields, including harvest control rules and technical measures applicable to sustainable utilization of the fishery, and based upon verifiable evidence and advice from available objective scientific and traditional sources.

8.1 Conservation and management measures shall be designed to ensure the long-term sustainability of fishery resources at levels which promote optimum utilization and are based on verifiable and objective scientific and/or traditional, fisher, or community sources.

8.1.1 When evaluating alternative conservation and management measures, the fishery management organization shall consider their cost-effectiveness and social impact.

8.1.2 Responsible fisheries management organizations shall adopt and implement measures necessary to ensure the management of bycatch and reduction of discards as part of fisheries management (1) in accordance with the PA, as reflected in Article 6 of the UN Fish Stocks Agreement, and as set out in Article 6.5 and 7.5 of the Code; (2) in accordance with the responsible use of fish as set out in the Code; and (3) based on the best scientific evidence available, taking into account fishers' knowledge.

8.2 The fishery management organization shall prohibit dynamiting, poisoning, and other similar destructive fishing practices.

8.3 The fishery management organization shall seek to identify domestic parties having a legitimate interest in the use and management of the fishery. When deciding on use, conservation, and management of the resource, due recognition shall be given, where relevant, in accordance with national laws and regulations, to the traditional practices, needs, and interests of indigenous people and local fishing communities which are highly dependent on these resources for their livelihood. Arrangements shall be made to consult all the interested parties and gain their collaboration in achieving responsible fisheries.

8.4 Where excess capacity exists, mechanisms shall be established to reduce capacity to levels commensurate with sustainable use of the resource. Fleet capacity operating in the fishery shall be measured and monitored. The fishery management organization shall maintain, in accordance with recognized international standards and practices, statistical data, updated at regular intervals, on all fishing operations and a record of all authorizations to fish allowed by them.

8.4.1 Studies shall be promoted that provide an understanding of the costs, benefits, and effects of alternative management options designed to rationalize fishing, especially options relating to excess fishing capacity and excessive levels of fishing effort.

8.5 Technical measures regarding the *stock under consideration* shall be taken into account, where appropriate, in relation to fish size, mesh size, gear, closed seasons or areas, areas reserved for particular (e.g., artisanal fisheries), and protection of juveniles or spawners.

8.5.1 Appropriate measures shall be applied to minimize catch, waste, and discards of non-target species (both fish and non-fish species), and impacts on associated, dependent, or endangered species.

8.6 Gear marking requirements shall take into account uniform and internationally recognizable gear marking systems.

8.7 The fishery management organization and relevant groups from the fishing industry shall measure performance and encourage the development, implementation, and use of selective, environmentally safe, and cost-effective gear, technologies, and techniques that are sufficiently selective as to minimize catch, waste, discards of non-target species (both fish and non-fish species) and impacts on associated or dependent predators. The use of fishing gear and practices that lead to discarding the catch shall be discouraged, and the use of fishing gear and practices that increase survival rates of escaping fish shall be promoted. Inconsistent methods, practices, and gears shall be phased out accordingly.

8.8 Technologies, materials, and operational methods or measures—including, to the extent practicable, the development and use of selective, environmentally safe, and cost-effective fishing gear and techniques—shall be applied to minimize the loss of fishing gear, the ghost fishing effects of lost or abandoned fishing gear, pollution, and waste.

8.9 The intent of fishing selectivity and fishing impacts-related regulations shall not be circumvented by technical devices. Information on new developments and requirements shall be made available to all fishers.

8.10 Assessment and scientific evaluation shall be carried out on the impacts of habitat disturbance on the fisheries and ecosystems prior to the commercial-scale introduction of new fishing gear, methods, and operations. Accordingly, the impacts of such introductions shall be monitored.

8.11 International cooperation shall be encouraged for research programs involving fishing gear selectivity, fishing methods and strategies, dissemination of the results of such research programs, and the transfer of technology.

8.12 The fishery management organization and relevant institutions involved in the fishery shall collaborate in developing standard methodologies for research into fishing gear selectivity, fishing methods and strategies, and on the behavior of

	target and non-target species regarding such fishing gear—as an aid for management decisions and with a view to minimizing non-utilized catches. 8.13 Where appropriate, policies shall be developed for increasing stock populations and enhancing fishing opportunities through the use of artificial structures. The fishery management organization shall ensure that, when selecting the materials to be used in the creation of artificial reefs, as well as when selecting the geographical location of such artificial reefs, the provisions of relevant international conventions concerning the environment and the safety of navigation are observed.
Summary of relevant changes	**Clauses 8.1, 8.1.1, 8.1.2, 8.5, and 8.7** EM in the pollock fishery As reported at last year's audit, Amendment 126 (BSAI) and Amendment 114 (GOA) Trawl Electronic Monitoring were in the final rule making stage of the Amendment process. This was completed and confirmed on July 29, 2024, became effective on August 28, 2024, and fishing under the new monitoring program began in January 2025. The purpose of Amendments 126 and 114 are to improve salmon accounting, reduce monitoring costs, improve the quality of monitoring data, and modify current retention and/or discard requirements as necessary to achieve these objectives in association with catcher vessels using trawl gear in the BS, AI, and GOA pollock fisheries along with associated tender vessels and processors. Implementation of EM on pollock catcher vessels in 2025 will result in a greater proportion of trips and salmon incidental catch amounts to be verified by independent fishery observers, resulting in more precision in PSC estimates of salmon. The Council reviewed a preliminary RIR focused on amending the Federal pelagic trawl gear definition and made revisions to the purpose and need and list of alternatives for analysis. The Council emphasized that this action is an essential step in ongoing efforts to minimize the impacts of pelagic trawl gear on bycatch, sensitive habitat, and unobserved mortality. At the October meeting, the Council affirmed that this action is intended to have a narrow scope and will focus solely on changes to the regulatory definition of pelagic trawl gear. The Council signaled within the revised purpose and need statement that clarifying this regulatory definition will facilitate the process to incentivize trawl gear innovation. This action is separate from ongoing Council efforts to incentivize gear innovations and amend performance standards. The next review of the RIR is scheduled for the June 2025 Council meeting. (NPFMC Newsletter, October 2024). Chum salmon bycatch in BS In February 2025, the Council reviewed a second preliminary analysis of proposed management alternatives to reduce chum salmon bycatch, particularly the bycatch of chum salmon originating from the Western Alaska river systems, to the extent practicable in the BS pollock fishery. The Council approved additional changes to the proposed management alternatives being considered and recommended NMFS publish the revised analysis as the draft Environmental Impact Statement after additional analysis of these new alternatives (NPFMC Newsletter, February 2025). Annual genetic sampling by fishery observers shows the BS pollock fishery incidentally catches chum salmon originating from countries across the North Pacific Rim. The bycatch is composed of predominantly hatchery origin Russian and Asian chum salmon. On average over the last decade, approximately 17% of the pollock fishery's chum salmon bycatch has been attributed to Western Alaska. However, the Council is focused on management actions that could minimize Western Alaska chum salmon bycatch because of the recent and ongoing declines in abundance, which have reduced or eliminated in-river harvest opportunities and resulted in broader negative impacts on communities and residents across Western and Interior Alaska that rely on chum salmon for cultural, nutritional, economic, and spiritual wellbeing. The management measures being considered all aim to reduce Western Alaska chum salmon bycatch. These include limits or "caps" on the number of chum salmon that may be caught in the pollock fishery and closure of all or part of the BS to pollock fishing once the limit is reached. The Council approved changes to the existing alternatives and included new options for further evaluation including: 1) Modifying an alternative to provide an in-season corridor closure to focus on minimizing bycatch on Western Alaska chum salmon stocks. The new options for evaluation include both larger corridor closures, as well as more discrete corridor closures compared to prior analysis, as well as modified cap amounts. These new closures could be managed either by NMFS in regulation or by the industry within their respective incentive plan agreements. Under either management framework, the in-season corridor boundaries, the closure window, and cap amount that triggers the closure would be set in federal regulations.

	2) A threshold under which the corridor cap would not apply if the salmon abundance increased to a certain level. 3) Consideration for adjustments to the Winter Herring Savings Area start date with the intention of providing greater flexibility for chum salmon avoidance. 4) Additional analysis of the potential impacts and options for the CDQ sector should their CDQ pollock be leased to non-catcher processor sectors in the future. The next required step will be to formally publish the draft EIS as required by Federal law, after staff completes the environmental, social and cultural, and economic analysis of alternatives and options that were revised at the February meeting. Multiple alternatives can be selected, and the full description of the alternatives and options is available here. The Council is tentatively scheduled to review the published draft EIS as well as the public comments received and take final action to recommend a preferred alternative to NMFS in December 2025 or February 2026 with possible implementation in 2027 (NPFMC Newsletter, February 2025). Chinook salmon bycatch in BS ADFG reported that the combined, post-season sum of the run sizes from the rivers comprising the three-river index (Upper Yukon, Unalakleet, and Kuskokwim Rivers) of Chinook salmon is 197,359 and is below the threshold level of 250,000. Therefore, the performance standard for the Bering Sea pollock fishery will remain at 33,318 Chinook salmon, and the PSC limit will remain at 45,000, for 2025 and 2026, as identified in 50 CFR 679.21 (NPFMC Newsletter, October 2024). **Clauses 8.2, 8.4, 8.4.1, 8.6, 8.8, 8.9, 8.11, and 8.12** No relevant changes were reported. **Clause 8.10** A pelagic trawl gear footrope modification exempted fishing permit was requested by Trident Seafoods on September 3, 2024 to exempt participants from the regulatory gear definition for pelagic trawl that states the specific number of allowable fishing lines, footrope, and weighted lines, to allow for testing of gear that aim to minimize seafloor contact when targeting pollock that are on or near the seafloor (NPFMC Newsletter, October 2024). **Clauses 8.13** Not applicable.
References	Amendment 126 (BSAI) and Amendment 114 (GOA) Trawl Electronic Monitoring NPFMC Council Meeting, Anchorage April 4-9. https://meetings.npfmc.org/Meeting/Details/3039 NPFMC Newsletter, October 2024 NPFMC Newsletter, February 2025
Summary of consistency with RFM Fisheries Standard	The fishery continues to meet the requirements of this Fundamental Clause of the RFM Fisheries Standard.

Fundamental Clause 9. Fishing operations shall be carried out by fishers with appropriate standards of competence in accordance with international standards, guidelines and regulations.	
9.1 States shall advance, through education and training programs, the education and skills of fishers and, where appropriate, their professional qualifications. Such programs shall take into account agreed international standards and guidelines. 9.2 States, with the assistance of relevant international organizations, shall endeavor to ensure, through education and training, that all those engaged in fishing operations be given information on the most important provisions of the FAO CCRF (1995), as well as provisions of relevant international conventions and applicable environmental and other standards that are essential to ensure responsible fishing operations. 9.3 The fishery management organization shall, as appropriate, maintain records of fishers which shall, whenever possible, contain information on their service and qualifications, including certificates of competency, in accordance with their State's laws.	
Summary of relevant changes	**Clause 9.1, 9.2, 9.3** No relevant changes were reported.
References	NA
Summary of consistency with RFM Fisheries Standard	The fishery continues to meet the requirements of this Fundamental Clause of the RFM Fisheries Standard.

Fundamental Clause 10. An effective legal and administrative framework shall be established and compliance ensured, through effective mechanisms for monitoring, surveillance, control, and enforcement for all fishing activities within the jurisdiction.	
10.1 Effective mechanisms shall be established for fisheries monitoring, surveillance, control, and enforcement measures including, where appropriate, observer programs, inspection schemes, and vessel monitoring systems, to ensure compliance with the conservation and management measures for the fishery in question. This could include relevant traditional, fisher, or community approaches, provided their performance could be objectively verified. 10.2 Fishing vessels shall not be allowed to operate on the stock under consideration in question without specific authorization. 10.3 States involved in the fishery shall, in accordance with international law, and within the framework of fisheries management organizations or arrangements, cooperate to establish systems for monitoring, control, surveillance, and enforcement of applicable measures with respect to fishing operations and related activities in waters outside the States jurisdiction. 10.3.1 Fishery management organizations which are members of or participants in fisheries management organizations or arrangements, shall implement internationally agreed measures adopted in the framework of such organizations or arrangements and consistent with international law to deter the activities of vessels flying the flag of non-members or non-participants engaging in activities that undermine the effectiveness of conservation and management measures established by such organizations or arrangements. In that respect, port States shall also proceed, as necessary, to assist other States in achieving the objectives of the FAO CCRF (1995) and should make known to other States details of regulations and measures they have established for this purpose without discrimination for any vessel of any other State. 10.4 jurisdiction of other States, unless such vessels have been issued with a Certificate of Registry and have been authorized to fish by the competent authorities. Such vessels shall carry on board the Certificate of Registry and their authorization to fish. 10.4.1 Fishing vessels authorized to fish on the high seas or in waters under the jurisdiction of a State other than the flag State shall be marked in accordance with uniform and internationally recognizable vessel marking systems such as the FAO Standard Specifications and Guidelines for Marking and Identification of Fishing Vessels.	
Summary of relevant changes	**Clause 10.1, 10.2** The following infringements and penalties against pollock vessels were reported in 2024: • AK2104142; F/V Pacific Star – Owner Pac Star Inc. and Operator John P. McCarthy were charged jointly and severally under the Magnuson-Stevens Fisheries Management and Conservation Act for interfering with the sampling procedure employed by an observer by discarding catch before sampling. A $3,000 notice of violation and assessment (NOVA) was issued, and the case settled for $2,700. • AK2300711; F/V Marathon – Owner Marathon Fisheries, Inc. and Operator Martin Stam were charged jointly and severally under the Magnuson-Stevens Fisheries Management and Conservation Act with exceeding the maximum retainable amount of groundfish bycatch on two trips. A $4,105.33 NOVA was issued, and the case settled for $3,694.79. • AK2301796; F/V Vanguard – Owner Vanguard Fisheries, LLC and Operator Per Hesberg were charged jointly and severally under the Magnuson-Stevens Fisheries Management and Conservation Act with fishing with, and having on board, non-pelagic trawl gear in Federal reporting areas open only to pelagic trawl gear; not complying with VMS requirements; and inaccurate reporting. A $59,784 NOVA was issued. The case settled for $15,000 as to the VMS violation; the Agency withdrew the remaining violations. • AK2202348; C/P Northern Eagle – Owners American Seafoods Company, LLC and Northern Eagle LLC were charged jointly and severally under the Magnuson-Stevens Fisheries Management and Conservation Act with failing to ensure no salmon of any species passed the observer collection point. A $15,000 NOVA was issued. • AK2003678; F/V American Dynasty –Medic Daniel Craig Azcarate was charged under the Magnuson-Stevens Management and Conservation Act with sexually harassing a female observer by conduct that had sexual connotations or otherwise creating an intimidating, hostile, or offensive environment. A $36,000 NOVA was issued and the case settled for $3,000. **Clause 10.3, 10.3.1, 10.4, 10.4.1** Not applicable.
References	17th Coast Guard District Enforcement Report, June 2024. https://meetings.npfmc.org/CommentReview/DownloadFile?p=fcb2e345-48b5-45af-91ef-a65e4d628257.pdf&fileName=B7%20USCG%20Report.pdf

	17th Coast Guard District Enforcement Report, April 2025. https://meetings.npfmc.org/CommentReview/DownloadFile?p=58d0dcd2-d10f-4ce3-aec4-5e07287918df.pdf&fileName=B6%20USCG%20Report.pdf Office of Law Enforcement, Alaska Enforcement Division, June 2024 Report to the NPFMC. https://meetings.npfmc.org/CommentReview/DownloadFile?p=3dbbb852-2322-4075-9be4-e56334a4a37b.pdf&fileName=B4%20OLE%20Report.pdf Office of Law Enforcement, Alaska Enforcement Division, December 2024 Report to the NPFMC. https://meetings.npfmc.org/CommentReview/DownloadFile?p=4da1b576-f601-484e-b0ca-58417b08e02d.pdf&fileName=B4%20NOAA%20Enforcement%20Report.pdf Office of Law Enforcement, Alaska Enforcement Division, December 2024, Presentation to the Council https://meetings.npfmc.org/CommentReview/DownloadFile?p=fd06740c-ac08-4909-824a-ecf55eef86ee.pdf&fileName=PPT%20B4%20NOAA%20Enforcement%20Report.pdf
Summary of consistency with RFM Fisheries Standard	The fishery continues to meet the requirements of this Fundamental Clause of the RFM Fisheries Standard.

Fundamental Clause 11. There shall be a framework for sanctions for violations and illegal activities of adequate severity to support compliance and discourage violations.	
11.1 States laws of adequate severity shall be in place that provide for effective sanctions. 11.2 Sanctions applicable to violations and illegal activities shall be adequate in severity to be effective in securing compliance and discouraging violations wherever they occur. Sanctions shall also be in force to affect authorization to fish and/or to serve as masters or officers of a fishing vessel in the event of noncompliance with conservation and management measures. 11.3 Fisheries management organizations shall ensure that sanctions for IUU fishing by vessels and, to the greatest extent possible, nationals under its jurisdiction are of sufficient severity to effectively prevent, deter, and eliminate IUU fishing and to deprive offenders of the benefits accruing from such fishing. This may include the adoption of a civil sanction regime based on an administrative penalty scheme. Fisheries management organizations shall ensure the consistent and transparent application of sanctions. 11.4 Flag States shall take enforcement measures towards fishing vessels entitled to fly their flag, which have been found by the State to have contravened applicable conservation and management measures. The State shall, where appropriate, make the contravention of such measures an offense under national legislation.	
Summary of relevant changes	**Clause 11.1, 11.2, 11.3** Noting that NOAA's Office of Law Enforcement and U.S. Coast Guard reports include updates on action taken and outcomes, including penalties, for all reported non-compliances. In February 2024, as part of an annual observer operation to Dutch Harbor, Special Agents and the Workplace Violence Prevention and Response Regional Coordinator undertook to provide outreach and education to the fishing industry to ensure a safe work environment for observers that is free from sexual assault, sexual harassment (SASH), and hostile work environments. Special Agents also undertook a review and investigation in relation to: 1. SASH of observers 2. Hostile work environment 3. Incidents that impact the general health and safety of observers 4. Interference/sample biasing of observer data 5. Failure to abide by catcher processor operational requirements that may result in a negative impact to the fishery resource There were 10 reports of SASH incidents resulting in Special Agents conducting multiple interviews, reviewing video footage, and measuring and photographing areas within the vessels. Non-SASH investigations were investigated further. A NOVA for a SASH case was also served to a subject during the operation. **Clause 11.4** Not applicable.
References	17th Coast Guard District Enforcement Report, June 2024. https://meetings.npfmc.org/CommentReview/DownloadFile?p=fcb2e345-48b5-45af-91ef-a65e4d628257.pdf&fileName=B7%20USCG%20Report.pdf 17th Coast Guard District Enforcement Report, April 2025. https://meetings.npfmc.org/CommentReview/DownloadFile?p=58d0dcd2-d10f-4ce3-aec4-5e07287918df.pdf&fileName=B6%20USCG%20Report.pdf Office of Law Enforcement, Alaska Enforcement Division, June 2024 Report to the NPFMC. https://meetings.npfmc.org/CommentReview/DownloadFile?p=3dbbb852-2322-4075-9be4-e56334a4a37b.pdf&fileName=B4%20OLE%20Report.pdf Office of Law Enforcement, Alaska Enforcement Division, December 2024 Report to the NPFMC. https://meetings.npfmc.org/CommentReview/DownloadFile?p=4da1b576-f601-484e-b0ca-58417b08e02d.pdf&fileName=B4%20NOAA%20Enforcement%20Report.pdf Office of Law Enforcement, Alaska Enforcement Division, December 2024, Presentation to the Council. https://meetings.npfmc.org/CommentReview/DownloadFile?p=fd06740c-ac08-4909-824a-ecf55eef86ee.pdf&fileName=PPT%20B4%20NOAA%20Enforcement%20Report.pdf
Summary of consistency with RFM Fisheries Standard	The fishery continues to meet the requirements of this Fundamental Clause of the RFM Fisheries Standard.

6.1.4 Key Component D: Serious Impacts of the Fishery on the Ecosystem

Fundamental Clause 12. Considerations of fishery interactions and effects on the ecosystem shall be based on the best scientific evidence available, local knowledge where it can be objectively verified, and a risk assessment-based management approach for determining most probable adverse impacts. Adverse impacts of the fishery on the ecosystem shall be appropriately assessed and effectively addressed.

12.1 The fishery management organization shall assess the impacts of environmental factors on target stocks and associated or dependent species in the same ecosystem, and the relationship among the populations in the ecosystem.

12.2 The most probable adverse impacts from human activities, including fishery effects on the ecosystem/environment, shall be assessed and, where appropriate, addressed and or/corrected, taking into account available scientific information and local knowledge. This may take the form of an immediate management response or a further analysis of the identified risk. In this context, full consideration should be given to the special circumstances and requirements in developing fisheries, including financial and technical assistance, technology transfer, training, and scientific cooperation. In the absence of specific information on the ecosystem impacts of fishing on the unit of certification, generic evidence based on similar fishery situations can be used for fisheries with low risk of severe adverse impact. However, the greater the risk, the more specific evidence shall be necessary to ascertain the adequacy of mitigation measures.

12.2.1 The fishery management organization shall consider the most probable adverse impacts of the unit of certification on main associated species (RFM v2.1 Guidance Appendix 1, Parts 3 and 7[6]), by assessing and, where appropriate, addressing and or/correcting them, taking into account the best scientific evidence available and local knowledge. Accordingly, these catches (including discards) shall be monitored and shall not threaten these non-target species with serious risk of extinction, recruitment overfishing, or other impacts that are likely to be irreversible or very slowly reversible. If such impacts arise, effective remedial action shall be taken.

12.2.2 The fishery management organization shall consider the most probable adverse impacts of the unit of certification on minor associated species (RFM v2.1 Guidance Appendix 1, Parts 3 and 7[7]), by assessing and, where appropriate, addressing and or/correcting them, taking into account the best scientific evidence available and local knowledge. Accordingly, these catches (including discards) shall be monitored and shall not threaten these non-target species with serious risk of extinction, recruitment overfishing, or other impacts that are likely to be irreversible or very slowly reversible. If such impacts arise, effective remedial action shall be taken.

12.2.3 There shall be outcome indicator(s) consistent with achieving management objectives for non-target species (i.e., avoiding overfishing and other impacts that are likely to be irreversible or very slowly reversible).

12.2.4 The fishery management organization shall consider the most probable adverse impacts of the unit of certification on ETP species (RFM v2.1 Guidance Appendix 1, Parts 4 and 7[8]), by assessing and, where appropriate, addressing and or/correcting them, taking into account the best scientific evidence available and local knowledge.

12.2.5 There shall be outcome indicator(s) consistent with achieving management objectives seeking to ensure that ETP species are protected from adverse impacts resulting from interactions with the unit of certification and any associated enhanced fishery activity, including recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.

12.2.6 The fishery management organization shall consider the most probable adverse impacts of the unit of certification on habitats (RFM v2.1 Guidance Appendix 1, Parts 5 and 7[9]), by assessing and, where appropriate, addressing and or/correcting them, taking into account the best scientific evidence available and local knowledge.

12.2.7 There shall be knowledge of the essential habitats for the *stock under consideration* and potential fishery impacts on them. Impacts on essential habitats, and on habitats that are highly vulnerable to damage by the fishing gear involved, shall be avoided, minimized, or mitigated. In assessing fishery impacts, the full spatial range of the relevant habitat shall be considered, not just the part of the spatial range that is potentially affected by fishing.

12.2.8 There shall be outcome indicator(s) consistent with achieving management objectives for avoiding, minimizing, or mitigating the impacts of the unit of certification on essential habitats for the *stock under consideration* and on habitats that are highly vulnerable to damage by the fishing gear of the unit of certification.

12.2.9 The fishery management organization shall consider the most probable adverse impacts of the fishery under assessment on the ecosystem (RFM v2.1 Guidance Appendix 1, Part 6[10]), by assessing and, where appropriate, addressing and or/correcting them, taking into account available scientific information and local knowledge.

12.2.10 There shall be outcome indicator(s) consistent with achieving management objectives seeking to minimize adverse impacts of the unit of certification (including any fishery enhanced activities) on the structure, processes,

[6] Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America (v2.1)
[7] Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America (v2.1)
[8] Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America (v2.1)
[9] Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America (v2.1)
[10] Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America (v2.1)

and function of aquatic ecosystems that are likely to be irreversible or very slowly reversible. Any modifications to the habitat for enhancing the stock under consideration must be reversible and not cause serious or irreversible harm to the natural ecosystem's structure, processes, and function.

12.2.11 The fishery management organization shall consider the most probable adverse human impacts on the stock/ecosystem under consideration, by assessing and, where appropriate, addressing and or/correcting them, taking into account available scientific information and local knowledge.

12.3 The role of the *stock under consideration* in the food web shall be considered, and if it is a key prey species[11] in the ecosystem, management objectives and measures shall be in place to avoid severe adverse impacts on dependent predators.

12.4 There shall be outcome indicator(s) consistent with achieving management objectives seeking to avoid severe adverse impacts on dependent predators resulting from the unit of certification fishing on a *stock under consideration* that is a key prey species.[12]

12.5 States shall introduce and enforce laws and regulations based on the International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 relating thereto (MARPOL 73/78).

12.6 Research shall be promoted on the environmental and social impacts of fishing gear especially on the impact of such gear on biodiversity and coastal fishing communities.

12.7 The fishery management organization shall make use, where appropriate, of Marine Protected Areas (MPAs). The general objectives for establishing MPAs shall include ensuring sustainability of fish stocks and fisheries and protecting marine biodiversity and critical habitats.

Summary of relevant changes	**Clauses 12.1, 12.3, and 12.4** NOAA and NOAA Fisheries continue to have a series of programs monitoring and modelling oceanographic processes in Alaska and adjoining waters. The data, together with a range of other environmental monitoring information such as plankton, low trophic level fish species, fish populations, and population dynamics of higher predators are all assembled through NMFS. The relationship between environmental factors (biotic and abiotic) and BSAI and GOA pollock are evaluated annually in the SAFE process (Ianelli et al. 2024a, b; Barbeaux et al. 2024; Monnahan et al. 2024). All significant and commercial species are assessed individually according to the SAFE Tier system. Most of the species' SAFE reports contain details on ecosystem effects on the species (e.g., prey availability) and fishery effects on the ecosystem. The SAFE evaluations provide a process by which a wide range of relevant environmental information is assembled and evaluated in relation to its potential effects. Ecosystem Status Reports are done annually for EBS, AI, and GOA, updating the climate, biological, and fishing effects in each region (Siddon 2024, Ortiz and Zador 2024, Ferriss 2024). In addition, the relationship between different populations in the ecosystem is evaluated through ongoing ecosystem and multi-species modelling programs within NMFS. These information sources are presented and considered annually at Council meetings. TAC-setting within the Council demonstrably follows the precautionary principle. This is also informed by the range of ecosystem indicators reported to the plan teams as part of the SAFE process. These indicators include mammalian predators of groundfish (e.g., Northern fur seals, Seller sea lions), which are considered by the stock assessment plan teams, SSC, and the Council in setting TACs. For mammalian predators of groundfish (e.g., pollock), outcome indicators of direct mortality are required by the Marine Mammal Protection Act and the Endangered Species Act (ESA) in terms of allowable mortalities. As noted in Section 5.5, recent conditions have been unusually warm with sea surface temperatures as much as 3° C (about 5.4° F) higher than average. Additionally, in recent years, the annual ice cover in the BS has decreased dramatically, which has likely affected several species' survivability and reproductive success. These changes have been and continue to be investigated. The Council's SSC and the Groundfish Plan Teams are considering these factors on an ongoing basis as they assess the groundfish stocks (e.g., Ianelli et al. 2024a, b; Barbeaux et al. 2024; Monnahan et al. 2024). **Clauses 12.2, 12.2.1, 12.2.2, and 12.2.3** There is a comprehensive set of measures in place to minimize catch, waste, and discards of non-target species, as described above. Each of the BSAI and GOA pollock fisheries have limited non-target catches with pollock making up more than 93% in both regions. In the case of the Alaska pollock fishery, the target

[11] See Appendix 1 page 150 of the Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America (v2.1).

[12] See Appendix 1 page 150 of the Guidance to Performance Evaluation forthe Certification of Wild Capture and Enhanced Fisheries in North America (v2.1).

	catch is above 300,000 tons so, as per the RFM requirements, the main associated species constitute 85% of the bycatch profile (Table 7 and Table 8). BSAI pollock fishery For the BSAI fishery, there are some main associated species with all (in total) making up less than 2% of the total average catch. The main associated species include: • Alaska skate – According to Tribuzio et al. (2024), the stock is not overfished. • Flathead sole – RFM and MSC certified; not overfished • Pacific cod – RFM and MSC certified; not overfished • Pacific ocean perch – RFM and MSC certified; not overfished • Rock sole –MSC certified; not overfished • Sablefish – RFM and MSC certified; not overfished • Scypho jellies – Grouping makes up 0.54% of total catch and 24.42% of total bycatch; however, this is a complex that is made up of several scypho jelly species so it is unlikely that the pollock fishery is negatively impacting the species. • Squid – Grouping makes up 0.34% of total catch and 15.48% of total bycatch; however, this is a complex that is made up of several squid species so it is unlikely that the pollock fishery is negatively impacting the species. • Yellowfin sole – RFM and MSC certified; not overfished There are several minor associated species with each of them making up <0.03% of the total average catch. Given the large number of minor associated species but the low catch rate, the assessment team has determined that it is unnecessary to list each one of them here. Refer to Table 7 for more details. None of the minor associated species are overfished so none are likely to be negatively impacted by the pollock fishery. Overall, these main and minor associated species and their catch amounts are similar to previous years. Therefore, this combined with operational measures employed by industry to meet the specific targets are effective at achieving the specified management objectives. GOA pollock fishery For the GOA fishery, there are some main associated species with each making up less than 2% of the total average catch. The main associated species include: • Arrowtooth flounder – MSC certified; not overfished • Pacific cod – RFM and MSC certified; not overfished • Pacific ocean perch – RFM and MSC certified; not overfished • Rock sole –MSC certified; not overfished • Squid – Grouping makes up 1.08% of total catch and 17.15% of total bycatch; however, this is a complex that is made up of several squid species so it is unlikely that the pollock fishery is negatively impacting the species. There are several minor associated species with each of them making up <0.20% of the total average catch. Given the large number of minor associated species but the low catch rate, the assessment team has determined that it is unnecessary to list each one of them here. Refer to Table 8 for more details. None of the minor associated species are overfished so none are likely to be negatively impacted by the pollock fishery. Overall, these main and minor species and their catch amounts are similar to previous years. Therefore, this combined with operational measures employed by industry to meet the specific targets are effective at achieving the specified management objectives. **Clauses 12.2.4 and 12.2.5** There continues to be a process in place for the development of management objectives to ensure that endangered species are protected from adverse impacts from interactions with the unit of certification. The endangered species inhabiting the BSAI and GOA are primarily under the responsibility of the U.S. Fish and Wildlife Service (USFWS) for seabird species and NOAA Fisheries for other protected species. For these fisheries, these are primarily marine mammals.

	NMFS annually categorizes all U.S. commercial fisheries under the List of Fisheries according to the levels of marine mammal mortality and serious injury (https://www.fisheries.noaa.gov/national/marine-mammal-protection/list-fisheries-summary-tables). Category III fisheries interact with marine mammal stocks with annual mortality and serious injury <1% of the marine mammal's potential biological removal (PBR) level and total fishery-related mortality <10% of PBR. Any fishery in Category III is considered to have achieved the target level of mortality and serious injury. Category II fisheries have a level of mortality and serious injury that is >1% but is <50% of the stock's PBR level, if total fishery related mortality is >10% of the PBR. Category I fisheries have frequent mortality and serious injury of marine mammal resulting in annual mortality >50% of PRB. The BSAI pollock trawl fishery is a Category II (occasional interactions), and the GOA pollock trawl is Category III (remote likelihood or no known interaction). (As of 2021, the other gears were no longer classified due to the lack of any interactions.) Observer program data continue to provide annual estimates of takes of endangered species – fish, seabirds, and marine mammals in the BSAI and GOA pollock fisheries. BSAI pollock trawl fishery The following species are listed on the List of Fisheries as relevant to this fishery: • Bearded seal (Beringia) • Harbor seal (Bristol Bay) • Humpback whale (Hawai'i) • Humpback whale (Mexico-North Pacific) • Humpback whale (Western North Pacific) • Pacific white-sided dolphin (North Pacific) • Ribbon seal • Ringed seal (Arctic) • Steller sea lion (western US) Marine mammals are rarely taken incidentally in the BSAI pollock trawl fishery. Of these species, five are also ESA-listed species: bearded seal, humpback whale (Mexico-North Pacific), and ringed seal are all threatened and humpback whale (Western North Pacific) and Steller sea lion are both endangered. The humpback whale is also listed in CITES Appendix I. According to available observer data for the most recent five-year period (2018-2022), the fishery has had 2 bearded seal, 1 fin whale (Northeast Pacific stock), 1 harbor seal, 4 humpback whale, 1 killer whale (Eastern North Pacific Alaska Resident stock), 2 Pacific white-sided dolphin, and 31 Steller sea lion mortalities (Brower et al. 2024). Overall, all of these catch numbers are significantly less than the species' PBRs (Young et al. 2024). Considering the cumulative impacts of all certified BSAI fisheries, the catch numbers are also below PBRs. Regarding Steller sea lions, BSAI and GOA cod fisheries have a negligible impact on the species. Additionally, mitigation measures are in place to limit interactions (e.g., closed areas for Steller sea lion breeding; https://www.fisheries.noaa.gov/species/steller-sea-lion/conservation-management). Seabird interactions with fishing gear are recorded through the NMFS Observer Program (summarized in Tide and Eich 2022), and population trends are monitored by USFWS (summarized in Dragoo et al. 2020). The catch numbers of seabird species in this fishery are minimal, and data show no significant changes to the amount of bycatch. The only recent seabird bycatch are kittiwakes, Laysan albatross, murres, northern fulmar, and shearwaters; none of these are ESA-listed species. Short-tailed albatross remains the main endangered bird species of concern in the Alaska fisheries, and this fishery has not caught any in at least the last 10 years. Three ESA-threatened salmon stocks that migrate to Alaskan waters include Lower Columbia River Chinook salmon, upper Willamette River Chinook salmon, and Lower Columbia River Chinook, spring. The bycatch of ESA-listed Chinook salmon by the BSAI pollock fishery increased in 2020. However, the 2021-2024 catch decreased again, and all recent catch totals remain within the 45,000 PSC limit. Data continue to be collected, and the bycatch numbers are analyzed annually (NOAA Fisheries 2023, 2024). Cumulatively, the catch numbers are also below limits. GOA pollock trawl fishery The following species are listed on the List of Fisheries as relevant to this fishery: • Steller sea lion (western US)

Marine mammals are rarely taken incidentally in the GOA pollock trawl fishery. The Steller sea lion is the only List of Fisheries species caught by the fishery. According to available observer data for the most recent five-year period (2018-2022), the fishery has had 1 Steller sea lion mortalities (Brower et al. 2024). The Steller sea lion is not listed in CITES Appendix 1. These catch numbers are significantly less than the species' PBR (Young et al. 2024). Cumulatively, the catch numbers are also below the PBR. Recent surveys indicate that in the GOA pup and non-pup numbers have increased, showing positive population trends.

According to observer data, this fishery catches no seabirds. Also, as with the BSAI pollock fishery, the GOA pollock fishery is not likely to jeopardize the continued existence of endangered Chinook stock. The bycatch of ESA-listed Chinook salmon by the GOA pollock fishery has increased since 2022. Nevertheless, Chinook prohibited species limits have been imposed. The limits appear unlikely to be exceeded, but measures such as closed areas of high bycatch are in place to minimize this bycatch. Cumulatively, the catch numbers are also below limits.

Clauses 12.2.6, 12.2.7, 12.2.8, and 12.7
In April 2022, a new five-year review of essential fish habitat (EFH) was announced. The review evaluated:

1) published scientific literature
2) unpublished scientific reports
3) information solicited from interested parties
4) previously unavailable or inaccessible data

In 2023, the Council revised the EFH sections of its fishery management plans to address the results of the five-year review, and the results of the review led to improved species distribution mapping using a more uniform approach as well as an update to the fishing effects model to remove a coding error that omitted unobserved catch events (https://www.fisheries.noaa.gov/alaska/habitat-conservation/alaska-essential-fish-habitat-reviews). All groundfish species had EFH impacts that were determined to be minimal and temporary.

There were two key issues regarding pelagic trawl gear:

1.) The Council chose not to take action to close the Red King Crab Savings Area due to concerns that fishing effort by pot, longline, and pelagic trawl gear could be having adverse effects on the recovery of the severely depleted Bristol Bay red king crab stock. However, the Council established an unobserved mortality working group for crab that has met and will provide a report to Council at their June 2025 meeting.
2.) A discussion paper was produced for the Council looking at the pelagic trawl gear definition to both align current regulations with objectives of the Council, which are to promote gear innovation and improvements as well as fixing more straightforward regulatory items (fix the codend not intended as part of the pelagic trawl/floats in salmon excluders, etc.). There is some interest in removing outdated regulations and improving the definition to meet the future needs of innovation and development particularly regarding benthic habitat impacts of pelagic trawl gear.

Clauses 12.2.9, 12.2.10, and 12.2.11
Management measures continue to be in place, based on sound, fishery-related evidence platforms and extensive evaluations designed to achieve the stated objectives for relevant ecosystem components. These specifically include marine mammals, seabirds, prohibited species, target and bycatch species, EFH, habitat areas of particular concern, and food-web effects. Also, ongoing monitoring and ecosystem modelling are in place to meet the overarching objective of effective ecosystem-based management (NPFMC 2007, 2019, 2020, 2024).

Clause 12.5
All fishing vessels operating in federal waters are required to comply with MARPOL Annex V, which specifically prohibits the at-sea disposal of all plastics. Vessels operating in the North Pacific therefore have three options: 1) non-plastics can be disposed of at sea within the legal restrictions, 2) they can incinerate wastes onboard the vessel, or 3) they can hold the wastes for shoreside disposal at port. Vessels are required to post oil pollution and garbage placards; have a written solid waste management plan that describes procedures for collecting, processing, storing, and discharging garbage; and have a designated person in charge of carrying out the plan. The BSAI and GOA pollock fishing vessels continue to be

	compliant with MARPOL Annex V as confirmed by regular vessel inspections and onboard observers (Austin Estabrooks, APA, pers. comm.). **Clause 12.6** The Council's overarching policy continues to include the objective of applying judicious and responsible fisheries management practices, based on sound scientific research and analysis. Also, all management measures are to be based on the best scientific information available. Key to delivering this scientific evidence base remains the work of the AFSC and their five-year strategic plan (NOAA Fisheries 2022). Research is often promoted and encouraged by academic institutions, furthering the aim of the Council. Research continues into community development associated with fisheries. Industry is also regularly involved in research.
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Summary of consistency with RFM Fisheries Standard	The fishery continues to meet the requirements of this Fundamental Clause of the RFM Fisheries Standard.

7 NON-CONFORMANCES

No non-conformances were raised during this surveillance audit.

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9 APPENDICES

Appendix 1: Stakeholder submissions

No stakeholder comments were received during the announced consultation opportunities.

ABOUT DNV

DNV is a global independent certification, assurance and risk management provider, operating in more than 100 countries. Through its broad experience and deep expertise, DNV advances safety and sustainable performance, sets industry benchmarks, drives innovative solutions.

Whether certifying a company's management system or products, providing training, assessing supply chains or digital assets, DNV enables customers and stakeholders to make critical decisions with confidence, continually improve and realize long-term strategic goals sustainably.

DNV draws on its wide technical and industry expertise to help companies worldwide build consumer and stakeholder trust. Driven by its purpose, to safeguard life, property, and the environment, DNV helps tackle the challenges and global transformations facing its customers and the world today and is a trusted voice for many of the world's most successful and forward-thinking companies.

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