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Certified Seafood International (CSI)

Alaska Flatfish

1st Surveillance Audit Report

Conformity Assessment Body (CAB)	MRAG Americas
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Fishery client	Alaska Seafood Cooperative
Assessment type	1 st Surveillance Report
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2. List of Abbreviations

ABC – Acceptable Biological Catch
ADEC – Alaska Department of Environmental Conservation
ADFG – Alaska Department of Fish and Game
ADP – Annual Deployment Plan
AFSC – Alaska Fisheries Science Center
AWT – Alaska Wildlife Troopers
BOF – Alaska Board of Fisheries
CAB – Conformity Assessment Body
CCRF – Code of Conduct for Responsible Fisheries
CFEC – Commercial Fisheries Entry Commission
CFR – Code of Federal Regulations
CSI – Certified Seafood International
EEZ – Exclusive Economic Zone
EFH – Essential Fish Habitat
ESA – Endangered Species Act
EFP – Exempted Fishing Permit
FAO – Food and Agriculture Organization
FIP – Fishery Improvement Project
FMP – Fishery Management Plan
GOA – Gulf of Alaska
HCR – Harvest Control Rule
MMPA – Marine Mammal Protection Act
MRAG – MRAG Americas, Inc.
MSA – Magnuson–Stevens Fishery Conservation and Management Act
MSC – Marine Stewardship Council
MSY – Maximum Sustainable Yield
NC – Non-conformance
NEPA – National Environmental Policy Act
NMFS – National Marine Fisheries Service
NOAA – National Oceanic and Atmospheric Administration
NPFMC – North Pacific Fishery Management Council
NPOP – North Pacific Observer Program
NPRB – North Pacific Research Board
OFL – Overfishing Limit
OLE – Office of Law Enforcement
PSC – Prohibited Species Catch
RFM – Responsible Fisheries Management
SAFE – Stock Assessment and Fishery Evaluation
SSC – Scientific and Statistical Committee
TAC – Total Allowable Catch
UoA – Unit of Assessment
UoC – Unit of Certification
USCG – United States Coast Guard

3. Executive summary

3.1. Introduction and description of surveillance process

This report contains the findings of the 1st surveillance audit in relation to the Alaska Flatfish bottom trawl fisheries. A remote surveillance audit was held on April 13th, 2026, in conjunction with Alaska rockfish and Atka mackerel against the CSI fisheries standard, and the surveillance audit of BSAI Atka Mackerel, Pacific Ocean Perch, and Northern Rockfish and GOA Pacific Ocean Perch, Northern Rockfish, and Dusky Rockfish, against the Marine Stewardship Council (MSC) fisheries Standard.

Alaska Flatfish fisheries are currently certified under the CSI and MSC Standards. The Alaska Flatfish fisheries were certified as sustainable under the CSI standard in December 2024.

Under the CSI certification, there are following Units of Certification (UoC):

- Alaska plaice (*Pleuronectes quadrituberculatus*) BSAI
- Arrowtooth flounder (*Atheresthes stomias*) BSAI & GOA
- Flathead sole (*Hippoglossoides elassodon*) BSAI & GOA
- Greenland turbot (*Reinhardtius hippoglossoides*) BSAI
- Kamchatka flounder (*Atheresthes evermanni*) BSAI
- Northern rock sole (*Lepidopsetta polyxstra*) BSAI & GOA
- Yellowfin sole (*Limanda aspera*) BSAI
- Southern rock sole (*Lepidopsetta bilineatus*) GOA
- Rex sole (*Glyptocephalus zachirus*) GOA

No issues were identified, and no changes in the fishery occurred that would result in a change in certification from the last assessment. The fisheries had no non-conformances or recommendations.

3.2. Recommendation with respect to continuing certification

MRAG Americas confirms that this fishery continues to meet CSI's RFM Fisheries Standard and shall remain certified.

4. Audit details

4.1. Surveillance information

Table 1: Surveillance information

1	Fishery name	
	Alaska flatfish complex	
2	Unit(s) of Certification (UoC)	
	Alaska plaice (<i>Pleuronectes quadrituberculatus</i>) BSAI Arrowtooth flounder (<i>Atheresthes stomias</i>) BSAI & GOA Flathead sole (<i>Hippoglossoides elassodon</i>) BSAI & GOA Greenland turbot (<i>Reinhardtius hippoglossoides</i>) BSAI Kamchatka flounder (<i>Atheresthes evermanni</i>) BSAI Northern rock sole (<i>Lepidopsetta polyxstra</i>) BSAI & GOA Yellowfin sole (<i>Limanda aspera</i>) BSAI Southern rock sole (<i>Lepidopsetta bilineatus</i>) GOA Rex sole (<i>Glyptocephalus zachirus</i>) GOA	
3	Date certified	Date of expiry

03 December 2024		03 December 2029
4	Audit type and number	
1st surveillance audit after reassessment		
5	Surveillance team leader	
Ms. Erin Wilson will serve as lead assessor and will be primarily responsible for ecosystem impacts. Erin joined MRAG Americas, Inc. in February 2015, where she currently serves as Director for the Fisheries Certification Division. She serves as the team leader, and/or team member, on several fishery assessments for both the Marine Stewardship Council (MSC) and Responsible Fisheries Management (RFM) Standards for Certification. She also works on the implementation and analysis of fishery improvement projects (FIPs) and provides oversight on social compliance audits and risk assessments. She has over 15 years of experience in marine science and has collaborated on a multitude of projects that focus on conservation in both biological and social science aspects. Prior to joining MRAG Americas, she worked at the Oregon Department of Fish and Wildlife (ODFW) as a Natural Resource Specialist and Biological Technician for the Oregon Marine Reserves. She has conducted qualitative interviews with commercial fishermen and fishing communities along the west coast regarding catch share programs, limited entry, and proposed designations of marine reserves. She has completed ISO 19011 Lead Auditor for Management Systems, SA8000, the SRA training for Fishery Progress, FISH Standard for Crew and all the MSC and RFM required trainings for team leader and assessment team member. She received a M.Sc. in Marine Resource Management from Oregon State University, a B.S. in Zoology and a Spanish minor from Colorado State University and attended Auburn University for Marine Science.		
6	Surveillance team members	
Dr. Giuseppe Scarcella will serve as an assessor and will be primarily responsible for stock assessment and fish stock biology. Dr. Scarcella is an experienced fishery scientist and population analyst and modeller, 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 Università 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 (CNR-ISMAR, now CNR-IRBIM). During the years of employment at CNR-ISMAR he has gained experience in benthic ecology, statistical analyses of fish assemblage 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. At the moment he is member of the Scientific, Technical and Economic Committee for Fisheries for the European Commission (STECF). He is author and co-author of more than 50 scientific paper peer reviewed journals and more than 150 national and international technical reports, most of them focused on the evolution of fish assemblages in artificial habitats and stock assessment of demersal species. Dr. Scarcella also holds the credential as a certifier of Responsible Fisheries Management (RFM). Antonio Gomez, Ph.D., will serve as assessor and will be primarily responsible for fisheries management. Antonio joined MRAG Americas in November 2025 as a Fisheries Certification Specialist and supports assessments evaluating fishery performance against the Marine Stewardship Council (MSC) and Certified Seafood International (CSI) sustainability standards. He has over ten years of experience in sustainable fisheries and marine conservation across Latin America and the Caribbean. His background includes ecological and fisheries monitoring, stakeholder engagement, and resilience and governance assessments. Prior to joining MRAG Americas, he worked as an independent consultant conducting MSC pre-assessments, external evaluations of Fishery Improvement Projects (FIPs), governance assessments, as well as supporting the Latin America and Caribbean Fishery Improvement Project Community of Practice. In addition, he worked at Comunidad y Biodiversidad, where he supported and coordinated several FIPs in Mexico. He has completed MSC-approved training for assessment team members, CSI training, and has experience working with interdisciplinary teams on socioenvironmental analyses, monitoring programs, and fisheries management strategies. He holds a Ph.D. in Environment and Development from the Autonomous University of Baja California (Mexico), an M.Sc. in Marine Ecology from the Center for Scientific Research and Higher Education of Ensenada (Mexico), an M.Sc. in Oceanography and Marine Environment Management from the University of Barcelona (Spain), and a B.Sc. in Environmental Science from the Autonomous University of Barcelona (Spain). A discussion between team members regarding conflict of interest and biases was held and none were identified.		
7	Audit time and location	
A remote surveillance audit was conducted at 9 am PDT on April 13th, 2026. The site visit was held in conjunction with the Alaska Atka Mackerel and Rockfish Fishery.		

8	Assessment and review activities
The surveillance reviewed any changes in science and management. During the audit, the following were reviewed: -Changes to the UoA and its management system. -Changes to science and stock assessments activities -Changes to management measures, implementation, monitoring and control -Changes of impacts of the fishery on the Ecosystem. -Performance in relation to any relevant conditions of the certification. -Any other significant changes in the UoA.	

4.2. Version details

Table 2: CSI program documents versions

Document/Assessment Tree	Version number/Type
RFM Procedure 2: Application to Certification Procedures for the Fishery Standard Version 2.2	Version 6.3, April 2025
CSI Certification Program Responsible Fisheries Management Fisheries Standard	Version 2.2, April 2025
Certified Seafood International Program Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries	Version 2.2, April 2025

4.3. Client contact details

Table 3: Client contact information

Applicant Information	
Organization/Company Name	Alaska Seafood Cooperative
Applicant Key Contact Information	Beth Concepcion, daudistel@seanet.com

4.4. Update on the fishery

4.4.1. Update on topics that trigger immediate failure

No topics were identified during the surveillance assessment that could lead to immediate failure.

4.4.2. Changes in the management regime and processes

No significant changes have been identified in the management regime and processes for the groundfish fisheries, flatfish fisheries included, since the last assessment. The Council continues to develop annual harvest specifications, including OFL, ABC, and TAC, based on the best available scientific advice. In December 2025, the North Pacific Fishery Management Council adopted the 2026–2027 harvest specifications for the BSAI and GOA groundfish fisheries based on SSC advice. Although the 2025 government shutdown delayed completion of some stock assessments, the SSC relied on the most recent peer-reviewed 2024 SAFE reports, 2026 projections, updated 2025 catch information, ecosystem status information, and contextual information from the 2025 bottom trawl surveys. No new conservation concerns were identified that warranted additional precautionary reductions, and none of the groundfish stocks were classified as overfished, nor was overfishing occurring in 2024 or 2025. No changes have been identified in fishing areas or spatial management measures, and no amendments to the relevant FMPs have been implemented since 2024.

4.4.3. Changes to organizational responsibility of the main management agencies

New Advisory Panel members include Shannon Carroll, Rick Laitinen, Craig Lowenberg, Heather Mann, and Chelsae Radell. In addition, Bernie Burkholder and Michael “Chance” Miller had their orientation terms extended through 2027, and Landry Price was reappointed to a one-year term. (NPFMC, 2026e)

Within the Council, Angel Drobnica was re-elected as Chair and Rachel Baker was elected Vice Chair. Angel Drobnica and Nicole Kimball were also reappointed to new terms (NPFMC, 2026f).

Nate Pamplin was appointed as the Washington Department of Fish and Wildlife designee, following Bill Tweit’s retirement (NPFMC, 2026f).

4.4.4. New information on the status of stocks

The Bering Sea Aleutian Island (BSAI) and Gulf of Alaska (GOA) flatfish complex included in the certification comprises 12 stocks across 9 species: BSAI & GOA Arrowtooth flounder (*Atheresthes stomias*), BSAI Kamchatka flounder (*Atheresthes evermanni*), BSAI Alaska plaice (*Pleuronectes quadrituberculatus*), BSAI & GOA Flathead sole (*Hippoglossoides elassodon*), BSAI Northern rock sole (*Lepidopsetta polyxstra*), GOA Northern and Southern rock sole (*Lepidopsetta polyxstra* and *Lepidopsetta bilineata*), BSAI Yellowfin sole (*Limanda aspera*), GOA Rex sole (*Glyptocephalus zachirus*) and BSAI Greenland turbot (*Reinhardtius hippoglossoides*). Information for assessing the status of those stocks come from the Stock Assessment and Fishery Evaluation (SAFE) reports (see: <https://www.fisheries.noaa.gov/tags/north-pacific-groundfish-stock-assessments>) presented in December 2024. The December 2025 review took place in the context of the U.S. federal government shutdown and lapse in appropriations from 1 October to 12 November 2025, which meant that AFSC authors could not complete the 2025 operational assessments and the Groundfish Plan Teams could not convene; as a result, the 2025 GOA and BSAI SAFE reports were not compiled (NPFMC, 2025; SSC, 2025). However, the management side remained covered because the Council and SSC were able to rely on the previously established two-year harvest-specification framework and on the most recent fully peer-reviewed 2024 SAFE reports and associated projected advice for 2025–2026 (NPFMC, 2025a; SSC, 2025). To provide additional assurance that the flatfish stocks remained in good condition the most recent survey information (when available) is presented in the following sections as supporting evidence, and stakeholder input indicated that recent Gulf and Bering Sea survey results did not reveal any major red flags for the stocks in scope (AFSC, 2025, Markowitz et al., 2025).

For the BSAI and GOA flatfish, including BSAI Kamchatka flounder, arrowtooth flounder, flathead sole, northern rock sole, yellowfin sole, Greenland turbot and Alaska plaice, and GOA arrowtooth flounder, flathead sole, northern rock sole, southern rock sole, and rex sole, the evidence reviewed for the first surveillance audit did not indicate any material change from the basis of the 2024 RFM Full Assessment Report relevant to Section B: Science and Stock Assessment Activities and the Precautionary Approach (MRAG, 2024). The 2024 RFM assessment concluded that the fishery remained in full conformance with Section B, with no non-conformances identified and no clauses rescored (MRAG, 2024). Stakeholder input for the current audit further indicated that, although the 2025 government shutdown disrupted the timing of the normal science and review cycle, it did not alter the underlying precautionary management framework, stock assessment methods, harvest strategies, harvest control rules, or routine data collection arrangements for the flatfish stocks; observer deployment and data collection continued, with only a temporary delay in observer debriefings. On that basis, the assessment team considers that there is no material new information indicating a change in conformance with RFM Section B for the 12 flatfish stocks, and that the previous finding of full conformance remains supported (MRAG, 2024).

BSAI arrowtooth flounder

For BSAI arrowtooth flounder, the available evidence supports the conclusion that the stock remains in a healthy state. The most recent flatfish certification material, based on the 2024 SAFE information, states that the stock is not subject to overfishing, not overfished, and not approaching an overfished condition, with spawning biomass remaining well above the relevant thresholds; it also notes that the catch-to-biomass ratio continues to decline, which is consistent with conservative exploitation (MRAG, 2024). The 2025 survey Figure 1 is consistent with that interpretation: it shows a 2025 EBS biomass estimate of about 492 thousand t, which is close to and slightly above the time-series mean shown in the figure (460 thousand t), together with a broad spatial distribution and a length structure broadly similar to 2024 (Markowitz et al., 2025). Catch performance in 2025 was also clearly within management limits: the BSAI 2025 Catch Report shows a 2025 TAC of 14,000 t and a 2025 catch of 9,024 t (through 8 November 2025), so there was no overshoot of the TAC; the same catch report also shows that the 2025 catch remained far below the ABC (88,683 t) and OFL (104,428 t) (NMFS, 2025a; SSC, 2025).

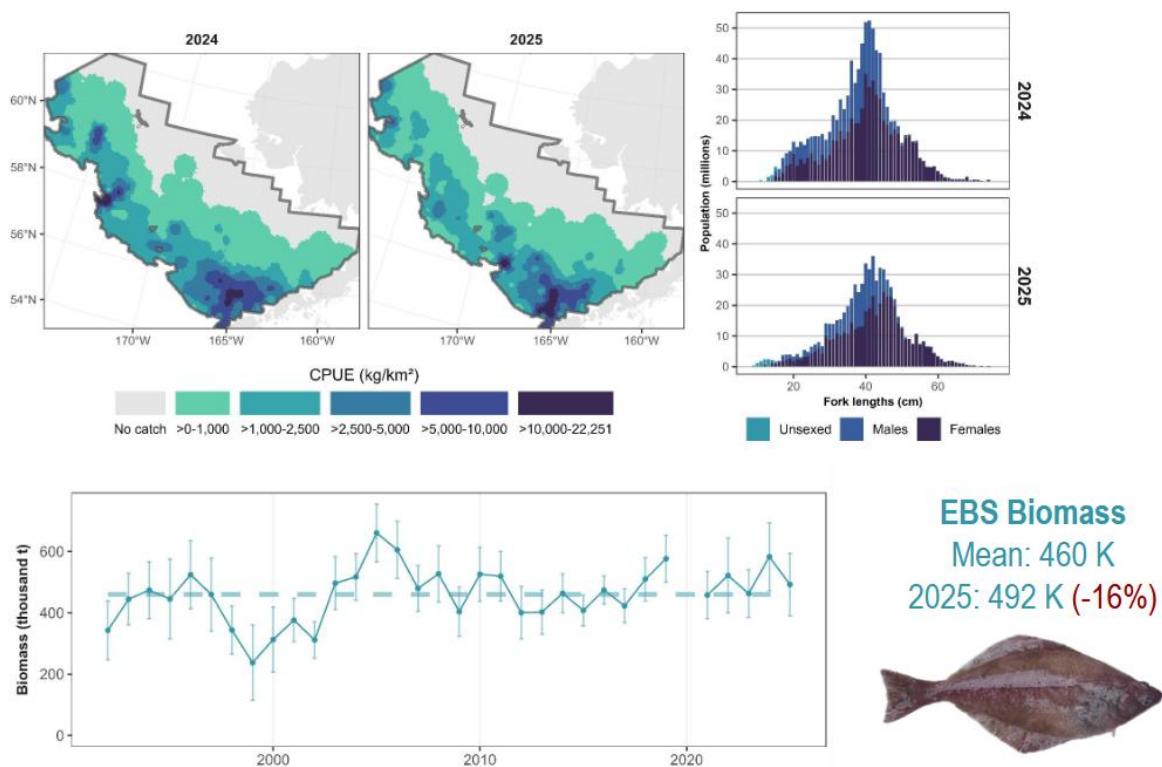


Figure 1. Inverse-distance weighted design-based weight CPUE, estimated design-based length composition, estimated design-based biomass time series with 95% confidence intervals and comparison to 2024 of BSAI arrowtooth flounder from the 2025 Eastern and Northern Bering Sea Bottom Trawl Survey. Source: Markowitz et al., 2025.

GOA arrowtooth flounder.

For GOA arrowtooth flounder, the available evidence indicates that the stock remains in a healthy state (SSC, 2025). The 2024 SAFE report stated that the stock is not subject to overfishing, not overfished, and not approaching an overfished condition, with projected spawning biomass in 2024–2026 remaining well above the relevant sustainability threshold. This is consistent with the Figure 2, which shows a survey biomass estimate in 2025 of about 1.443 million mt, or +21.8% relative to 2023, together with a broad distribution across the Gulf of Alaska and a length structure that remains broadly comparable to recent years (AFSC, 2025). The December 2025 SSC review further concluded that the assessment had remained highly stable, that projected spawning biomass in 2024–2026 was nearly double B35%, that fishery exploitation was very low, and that the 2025 survey increase of about 22% did not indicate any new ecosystem or fishery-performance concern (SSC, 2025). Catch performance in 2025 was also clearly within management limits: the GOA 2025 Catch Reports show a 2025 TAC of 100,454 t and a 2025 catch of 13,075 t (through 8 November 2025), so there was no overshoot of the TAC; catch also remained well below the 2025 ABC of 119,547 t and OFL of 142,832 t (NMFS, 2025b; SSC, 2025).

- Biomass estimate in 2025: ~1443000 mt
- +21.8% from 2023 

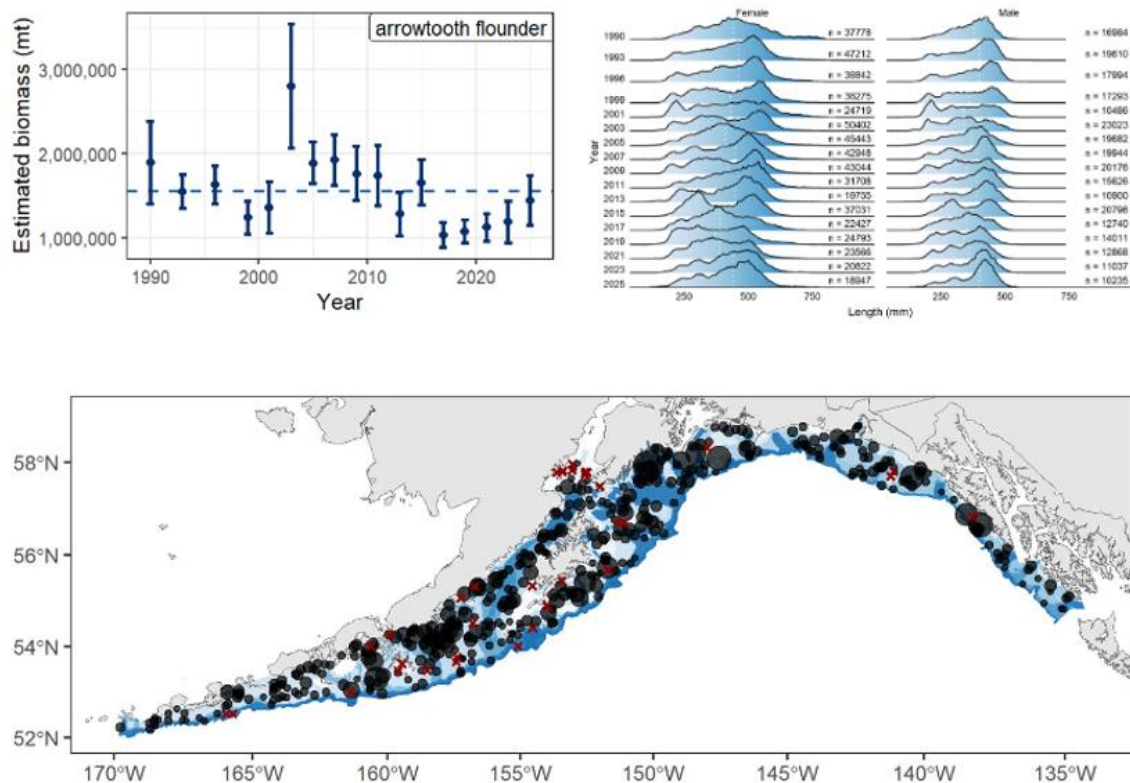


Figure 2. Estimated design-based biomass time series with 95% confidence ranges, estimated design-based length compositions and maps of positive hauls of GOA Pacific Ocean Perch the from the 2025 Gulf of Alaska Biennial Bottom Trawl Survey Biomass trends. Source: AFSC, 2025.

BSAI Kamchatka flounder

For BSAI Kamchatka flounder, the available evidence supports the conclusion that the stock remains in a safe and healthy status, even without relying on a dedicated 2025 survey biomass-trend figure (NMFS, 2025a). The 2024 SAFE-based summary stated that the stock is managed under Tier 3a, that fishing mortality is constrained to sustainable levels, and that projections indicate the stock will remain above the overfished threshold (B35%) through 2026 and is not approaching an overfished condition (MRAG, 2024). The same source notes that recent catches have remained below TAC, consistent with sustainable management, and that risk assessments identified only minor assessment uncertainty, with no major ecosystem or fishery-performance concerns (MRAG, 2024). This interpretation is reinforced by the 2025 BSAI Catch Reports, which show that the 2025 TAC was 6,800 t and the 2025 catch was 5,038 t (through 8 November 2025), confirming that there was no overshoot of the TAC; the same report also shows the 2025 catch remained below both the ABC (6,800 t) and the OFL (8,019 t) (NMFS, 2025a). Taken together, the 2024 SAFE conclusions and the 2025 catch performance support the view that BSAI Kamchatka flounder remained in a safe stock condition in 2025 (MRAG, 2024; NMFS, 2025a; SSC, 2025).

BSAI Alaska plaice

For BSAI Alaska plaice, the available evidence indicates that the stock remains in a healthy and safe status (Markowitz et al., 2025; NMFS, 2025). The 2025 survey Figure 3 shows an EBS biomass estimate of about 334 thousand t, which is 5% lower than 2024 and below the time-series mean shown in the figure (486 thousand t), but the series also indicates that Alaska plaice biomass has remained within the historical range of fluctuation rather than showing an abrupt collapse (Markowitz et al., 2025). This interpretation is consistent with the 2024 SAFE-based summary in the 2024 RFM Full Assessment Report (MRAG, 2024), which states that Alaska plaice is managed under Tier 3, is not subject to overfishing, shows no signs of being overfished, and had an estimated female spawning biomass of 150,892 t, well above the relevant sustainability threshold. Catch performance in 2025 was also clearly precautionary: the BSAI 2025 Catch Reports show a 2025 TAC of 15,903 t and a 2025 catch of 6,947 t (through 8 November 2025), so there was no

overshoot of the TAC; catch also remained well below the 2025 ABC of 28,745 t and OFL of 34,576 t (NMFS, 2025a). Taken together, the survey figure, the 2024 SAFE conclusions, and the 2025 catch data support the conclusion that BSAI Alaska plaice remained in good condition in 2025 (Markowitz et al., 2025; MRAG, 2024; NMFS, 2025a; SSC, 2025).

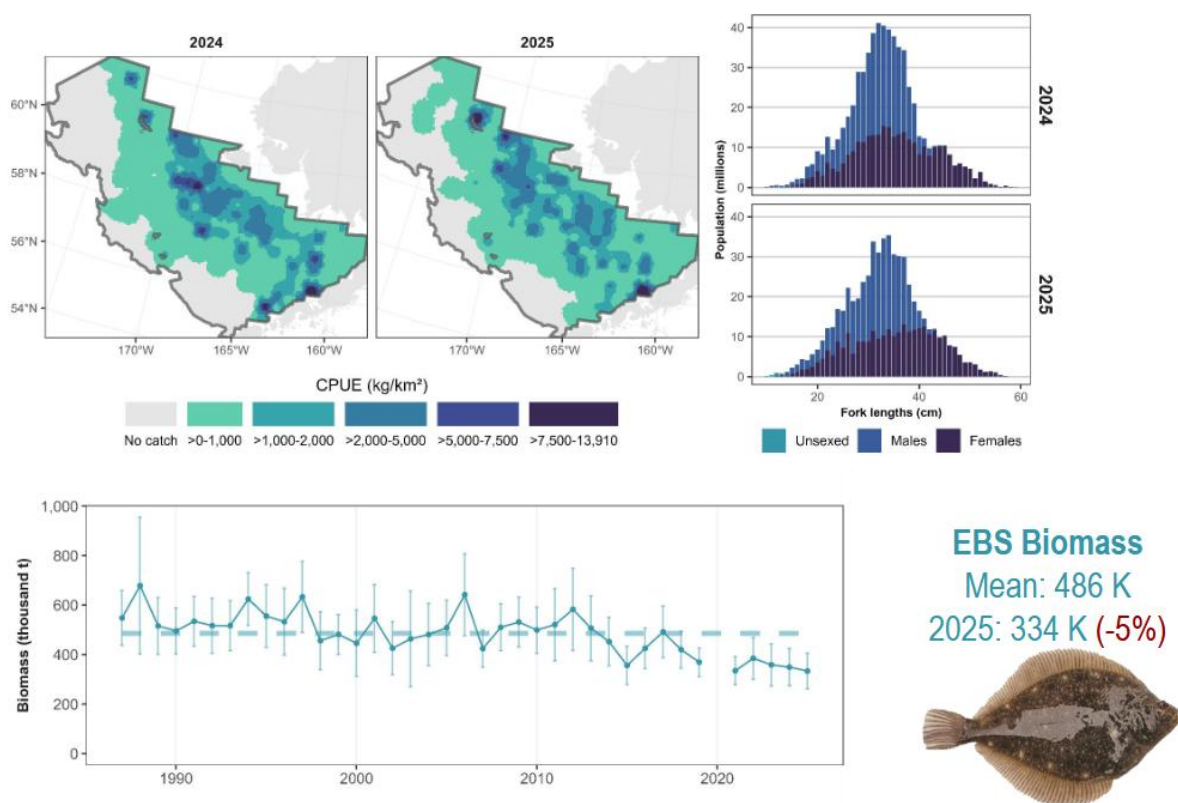


Figure 3. Inverse-distance weighted design-based weight CPUE, estimated design-based length composition, estimated design-based biomass time series with 95% confidence intervals and comparison to 2024 of BSAI Alaska plaice from the 2025 Eastern and Northern Bering Sea Bottom Trawl Survey. Source: Markowitz et al., 2025.

GOA flathead sole

For GOA flathead sole, the available evidence indicates that the stock remains in a healthy and safe status (MRAG, 2024; AFSC 2025). The Figure 4 shows a 2025 survey biomass estimate of about 203,000 mt, which is 44.7% higher than in 2023, with a broad spatial distribution across the Gulf of Alaska and a length composition that is broadly comparable to recent years (AFSC, 2025). This survey signal is consistent with the 2024 SAFE-based summary in the flatfish 2024 RFM Full Assessment Report, which states that the stock is not overfished and not subject to overfishing, and that projected female spawning biomass is expected to remain stable at about 98,986 t in 2025 and 100,272 t in 2026, well above the relevant overfished threshold (MRAG, 2024). Catch performance in 2025 was also clearly precautionary: the GOA 2025 Catch Reports show a 2025 TAC of 36,534 t and a 2025 catch of 836 t (through 8 November 2025), confirming that there was no overshoot of the TAC; catch also remained far below the 2025 ABC of 41,476 t and OFL of 50,587 t (NMFS, 2025b). Taken together, the 2025 survey figure, the 2024 SAFE conclusions, and the 2025 catch data support the conclusion that GOA flathead sole remained in good condition in 2025 (AFSC, 2025; NMFS, 2025b; SSC, 2025).

- Biomass estimate in 2025: ~203000 mt
- +44.7% from 2023 ↑

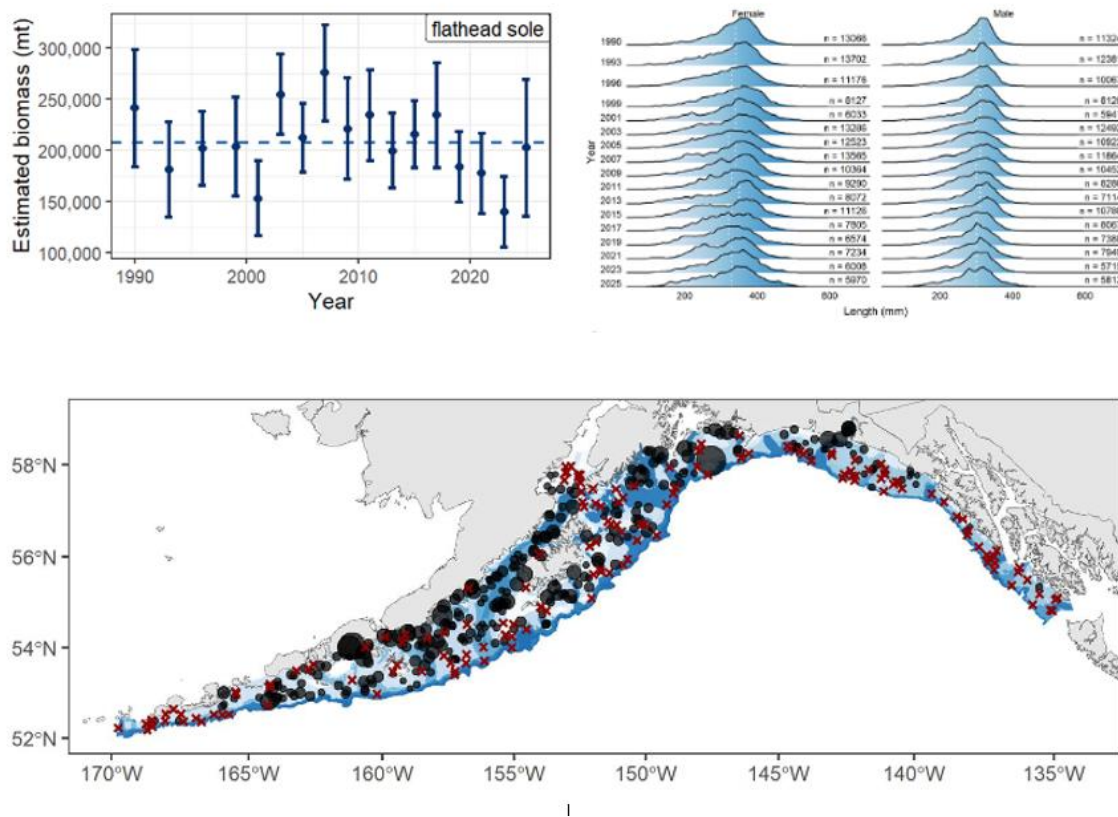


Figure 4. Estimated design-based biomass time series with 95% confidence ranges, estimated design-based length compositions and maps of positive hauls of GOA flathead sole from the 2025 Gulf of Alaska Biennial Bottom Trawl Survey Biomass trends. Source: AFSC, 2025.

BSAI flathead sole

For BSAI flathead sole, the available evidence indicates that the stock remained in a healthy and safe status in 2025 (Markowitz et al., 2025; NMFS, 2025a). The Figure 5 shows a strong 2025 EBS survey biomass estimate of about 714 thousand t, which is close to the upper range of the time series and only slightly below 2024, while the 2025 NBS biomass is shown at about 66 thousand t; overall, the figure indicates that flathead sole remained widely distributed and abundant in the Bering Sea (Markowitz et al., 2025). This is consistent with the 2024 SAFE-based summary in the flatfish 2024 RFM Full Assessment Report, which states that BSAI flathead sole is managed under Tier 3a, that spawning biomass in 2024 was estimated at 185,493 t, that recent catches were below the maximum permissible ABC, and that the 2025 ABC and OFL were set at 83,807 t and 101,621 t, respectively, with no significant environmental, competition, or predation concerns identified (MRAG, 2024). Catch performance in 2025 was also clearly precautionary: the BSAI 2025 Catch Reports show a 2025 TAC of 36,000 t and a 2025 catch of 8,432 t (through 8 November 2025), confirming that there was no overshoot of the TAC; catch also remained well below the 2025 ABC of 83,807 t and OFL of 101,621 t (AFSC/NMFS, 2025). Taken together, the 2025 survey figure, the 2024 SAFE conclusions, and the 2025 catch data support the conclusion that BSAI flathead sole remained in good condition in 2025 (Markowitz et al., 2025; NMFS, 2025a; SSC, 2025).

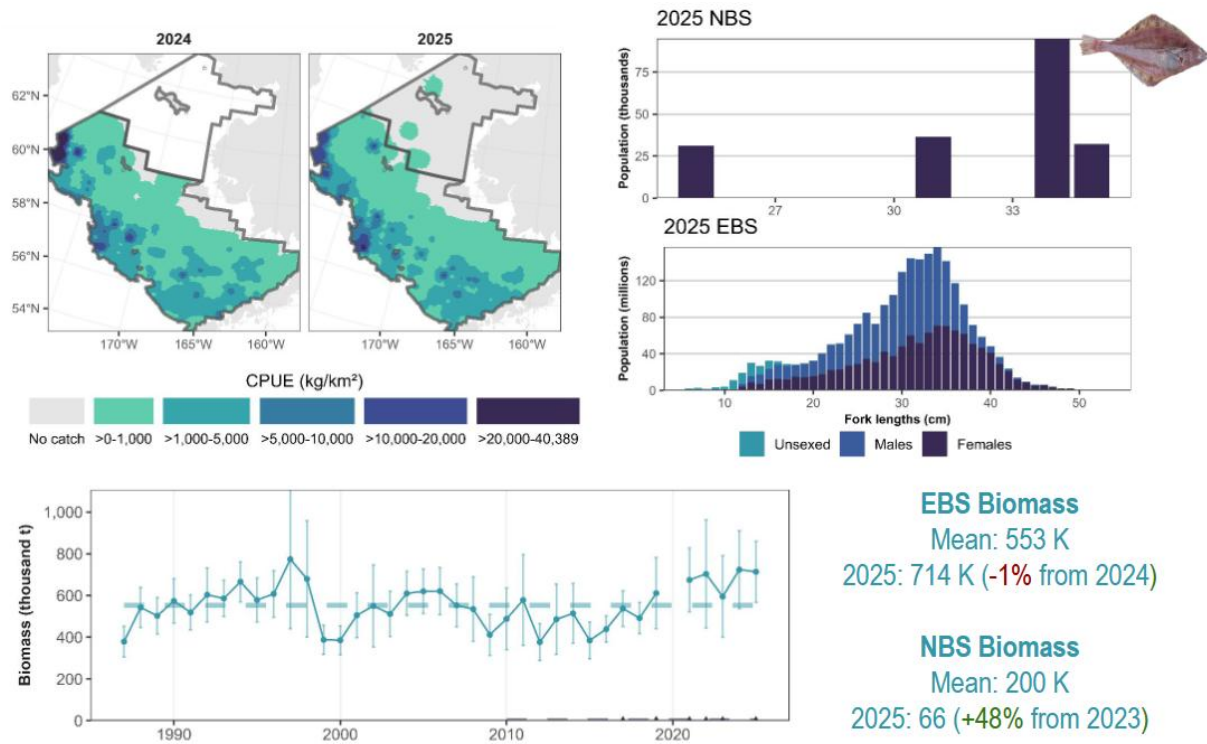


Figure 5. Inverse-distance weighted design-based weight CPUE, estimated design-based length composition, estimated design-based biomass time series with 95% confidence intervals and comparison to 2024 of BSAI flathead sole from the 2025 Eastern and Northern Bering Sea Bottom Trawl Survey. Source: Markowitz et al., 2025.

GOA Southern rock sole

For the GOA southern rock sole, the available evidence indicates that the stock complex remained in a healthy and safe status in 2025 (AFSC, 2025; NMFS, 2025b; SSC, 2025). The Figure 6 shows that the Southern rock sole complex survey biomass was estimated at about 153,000 mt, an increase of 33.9% from 2023, with the time series returning to a level above the long-term mean and with broad spatial distribution across the Gulf of Alaska (AFSC, 2025). This is consistent with the 2024 SAFE-based summary in the flatfish 2024 RFM Full Assessment Report, which states that both GOA northern rock sole and GOA southern rock sole are managed as Tier 3 stocks, and that neither species is subject to overfishing, overfished, nor approaching an overfished condition (MRAG, 2024). The December 2025 SSC review reached the same overall conclusion, noting that the 2025 bottom trawl survey showed a 30.8% increase in the northern/southern rock sole complex from 2023 to 2025, that the latest survey indices were above the 35-year average, and that the SSC did not identify any risk factors warranting a change from the preliminary OFLs and ABCs for 2026 (SSC, 2025). Catch performance in 2025 was also clearly precautionary: the SSC reported, based on the 2025 catch reports, that catch in 2025 (through 8 November) remained below the TAC, and specifically that it was about 95% below the TAC (SSC, 2025). Taken together, the 2025 survey signal, the 2024 SAFE conclusions, and the very low 2025 catch relative to TAC support the conclusion that the GOA northern and southern rock sole complex remained in good condition in 2025 (AFSC, 2025; NMFS, 2025b; SSC, 2025).

- Biomass estimate in 2025: ~153000 mt
- +33.9% from 2023 

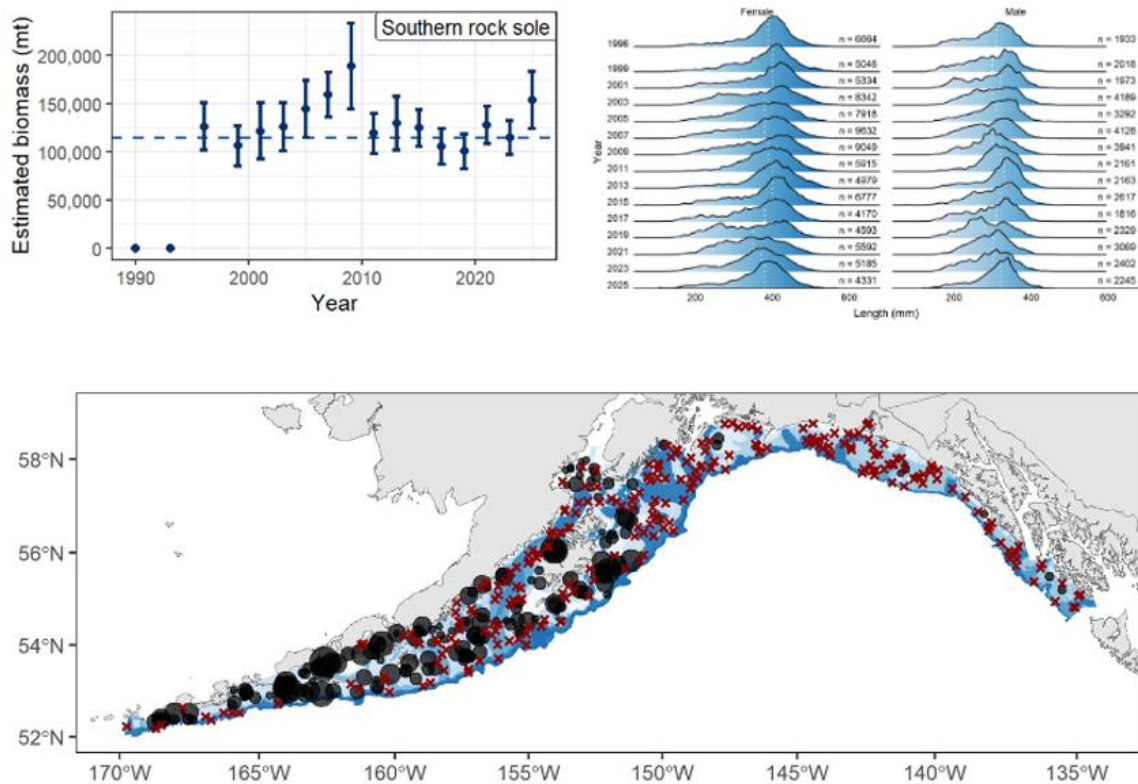


Figure 6. Estimated design-based biomass in mt time series with 95% confidence ranges and maps of positive hauls of GOA Southern rock sole the from the 2025 Gulf of Alaska Biennial Bottom Trawl Survey Biomass trends. Source: AFSC, 2025.

BSAI Northern rock sole

For BSAI northern rock sole, the available evidence indicates that the stock remained in a healthy and safe status in 2025 (Markowitz et al., 2025; NMFS, 2025a). The Figure 7 shows an EBS survey biomass estimate of about 1.5 million t in 2025, up about 4% from 2024, with the stock still broadly distributed across the eastern Bering Sea; although this remains below the long-term mean shown in the figure, it is consistent with the more recent stabilization and modest increase in the survey series (Markowitz et al., 2025). This is consistent with the 2024 SAFE-based summary in the flatfish 2024 RFM Full Assessment Report, which states that BSAI northern rock sole is not overfished and not approaching an overfished condition, and that projected 2025 spawning biomass was 301,051 t, well above the BMSY reference point of 183,756 t, keeping the stock in Tier 1a (MRAG, 2024). The same source notes that historical catches have remained well below the ABC, supporting conservative exploitation. Catch performance in 2025 also remained clearly within management limits: the BSAI 2025 Catch Reports show a 2025 TAC of 67,000 t and a 2025 catch of 39,947 t (through 8 November 2025), confirming that there was no overshoot of the TAC; catch also remained below the 2025 ABC of 157,487 t and OFL of 165,444 t (NMFS, 2025a). Taken together, the survey signal, the 2024 SAFE conclusions, and the 2025 catch data support the conclusion that BSAI northern rock sole remained in good condition in 2025 (Markowitz et al., 2025; NMFS, 2025a; SSC, 2025).

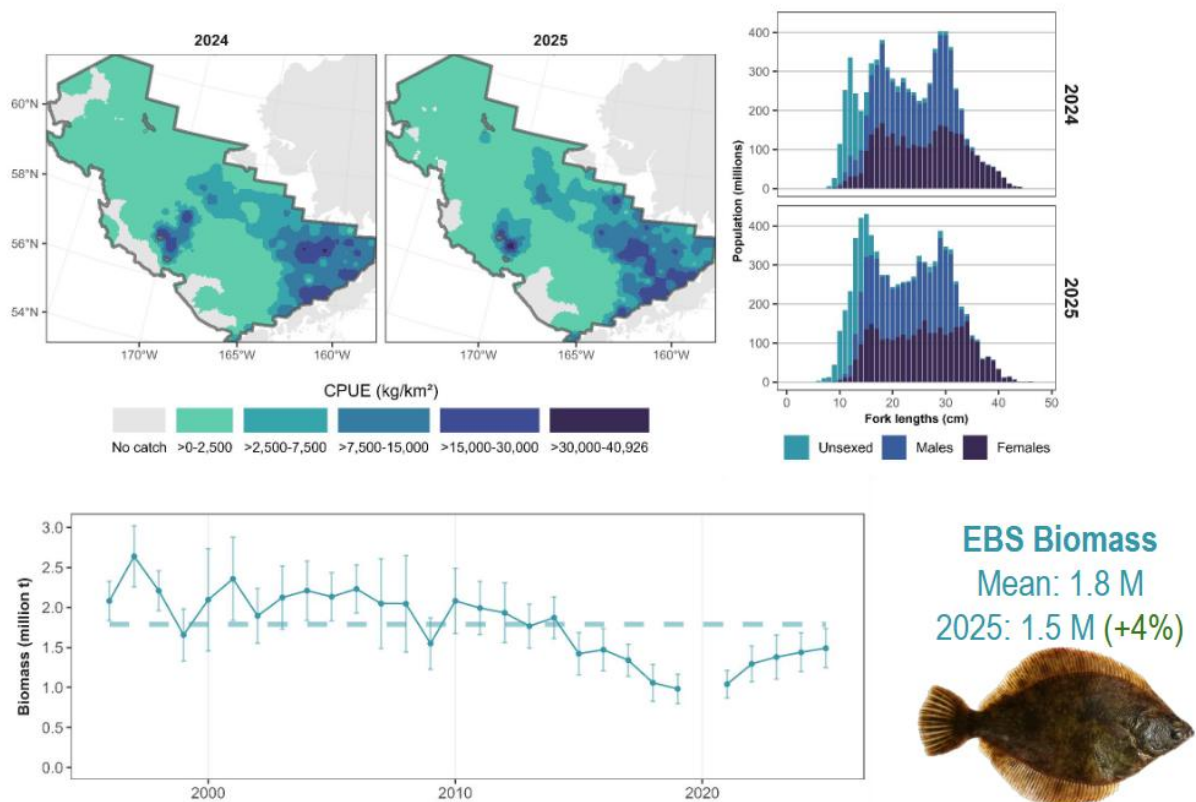


Figure 7. Inverse-distance weighted design-based weight CPUE, estimated design-based length composition, estimated design-based biomass time series with 95% confidence intervals and comparison to 2024 of BSAI Northern rock sole from the 2025 Eastern and Northern Bering Sea Bottom Trawl Survey. Source: Markowitz et al., 2025.

BSAI yellowfin sole

For BSAI yellowfin sole, the available evidence indicates that the stock remained in a healthy and well-managed status in 2025 (Spies et al., 2024; AFSC, 2025; SSC, 2025; AFSC/NMFS, 2025). The Figure 8 shows that the 2025 EBS biomass was about 1.5 million t, a 3% increase from 2024, while the 2025 NBS biomass was about 312 thousand t, a 21% decrease from 2023; taken together, this suggests some spatial variability, but not a deterioration in overall stock condition (AFSC, 2025; SSC, 2025). This interpretation is consistent with the 2024 SAFE report, which states that yellowfin sole remains a Tier 1a stock, with estimated female spawning biomass in 2025 of 748,076 t, or about 1.56 times BMSY, indicating a healthy and abundant stock, while biomass and spawning biomass, although lower than historical peaks, remain well above sustainability thresholds (Spies et al., 2024). The December 2025 SSC review similarly concluded that the stock's spawning biomass has been slowly declining since the 1970s but has stabilized over the last decade, that there were no elevated risk scores in the 2024 assessment, and that the SSC did not identify any risk factors warranting a change from the preliminary 2026 OFLs and ABCs (SSC, 2025). Catch performance in 2025 also remained clearly within management limits: the BSAI 2025 Catch Reports show a 2025 TAC of 135,000 t and a 2025 catch of 80,971 t (through 8 November 2025), compared with a 2024 catch of 91,192 t, so there was no overshoot of the TAC and catches remained well below the 2025 ABC of 262,557 t and OFL of 299,247 t (AFSC/NMFS, 2025). Taken together, the attached survey figure, the 2024 SAFE conclusions, the SSC review, and the 2025 catch data support the conclusion that BSAI yellowfin sole remained in good condition in 2025.

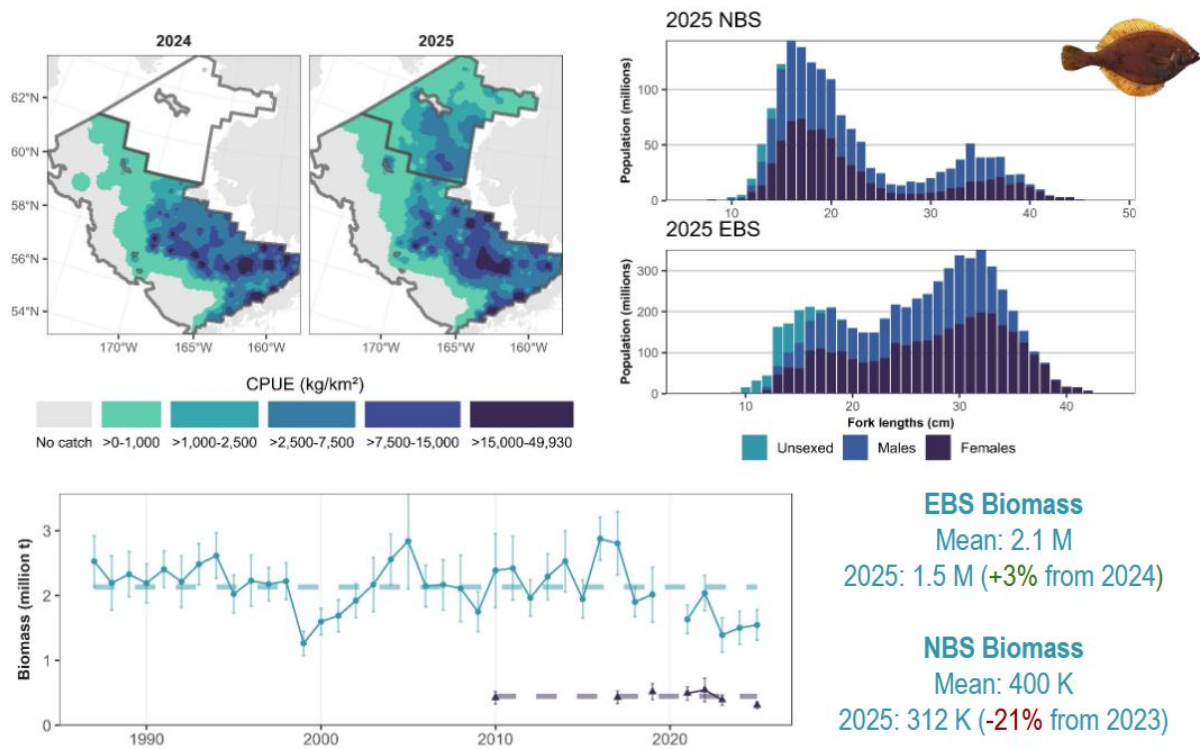


Figure 8. Inverse-distance weighted design-based weight CPUE, estimated design-based length composition, estimated design-based biomass time series with 95% confidence intervals and comparison to 2024 of BSAI yellowfin sole from the 2025 Eastern and Northern Bering Sea Bottom Trawl Survey. Source: Markowitz et al., 2025.

GOA rex sole

For GOA rex sole, the available evidence indicates that the stock remained in a healthy and safe status in 2025 (AFSC, 2025; SSC, 2025; NMFS, 2025b). The Figure 9 shows a 2025 survey biomass estimate of about 113,000 mt, which is 22.6% higher than in 2023, with a broad distribution across the Gulf of Alaska and a time series that remains at or above the long-term mean in recent years (AFSC, 2025; SSC, 2025). This is consistent with the 2024 SAFE-based summary in the flatfish 2024 RFM Full Assessment Report, which states that GOA rex sole is a Tier 3a stock, with no indication of overfishing, overfished status, or approaching overfished thresholds, and with projected female spawning biomass for 2025 of 61,695 t, well above the sustainability threshold (MRAG, 2024). The December 2025 SSC review likewise noted that survey estimates have been at or above the long-term mean since 2021, that the 2025 survey was up about 23% from 2023, and that the SSC did not identify any risk factors warranting a change to the preliminary OFLs and ABCs for 2026 (SSC, 2025). Catch performance in 2025 also remained clearly within management limits: the GOA 2025 Catch Reports show a 2025 TAC of 21,387 t and a 2025 catch of 567 t (through 8 November 2025), confirming that there was no overshoot of the TAC; catch also remained far below the 2025 ABC of 21,387 t and OFL of 26,002 t (AFSC/NMFS, 2025). Taken together, the 2025 survey figure, the 2024 SAFE conclusions, the SSC review, and the 2025 catch data support the conclusion that GOA rex sole remained in good condition in 2025 (AFSC, 2025; NMFS, 2025b; SSC, 2025).

- Biomass estimate in 2025: ~113000 mt
- +22.6% from 2023 ↑

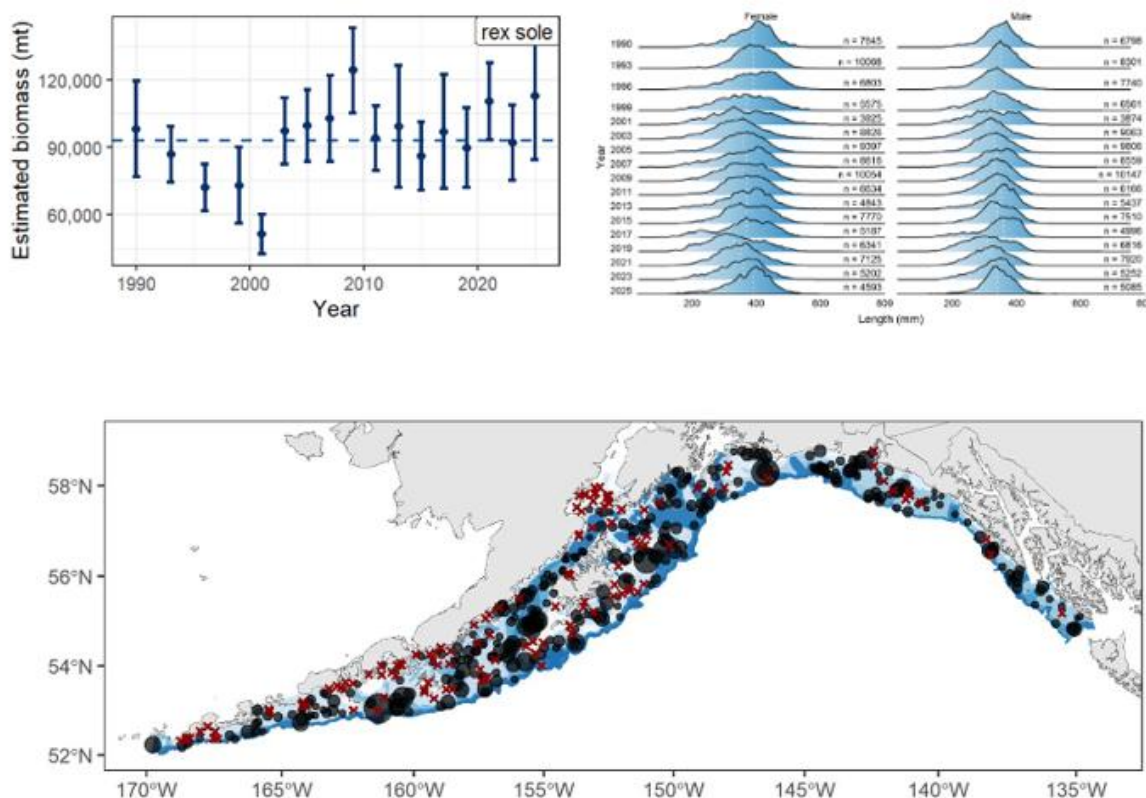


Figure 9. Estimated design-based biomass time series with 95% confidence ranges, estimated design-based length compositions and maps of positive hauls of GOA rex sole the from the 2025 Gulf of Alaska Biennial Bottom Trawl Survey Biomass trends. Source: AFSC, 2025.

GOA Northern rock sole

For GOA northern rock sole, the available evidence indicates that the stock remained in a healthy and precautionarily managed status in 2025 (AFSC, 2025; NMFS, 2025a; SSC, 2025). The Figure 10 shows a biomass estimate of about 31,000 mt, which is 17.6% higher than in 2023, with the stock still broadly distributed across the Gulf of Alaska and a length composition broadly consistent with recent years (AFSC, 2025). This is consistent with the 2024 SAFE-based summary in the flatfish 2024 RFM Full Assessment Report, which states that GOA northern rock sole is a Tier 3 stock and that, together with GOA southern rock sole, it is not subject to overfishing, not overfished, and not approaching an overfished condition; the same assessment also recommended 2025 ABCs of 4,600 t in the Central-Eastern GOA and 9,168 t in the Western GOA (MRAG, 2024). The December 2025 SSC review further noted that northern and southern rock sole assessments remained generally consistent, that the broader northern/southern rock sole complex increased by 30.8% from 2023 to 2025, and that the SSC did not identify any risk factors warranting a change to the preliminary 2026 OFLs and ABCs (SSC, 2025). A limitation is that the 2025 GOA catch report does not report northern rock sole separately, but only within the broader shallow-water flatfish grouping; even so, the SSC reported that 2025 catch remained below TAC, with catch up to 8 November 2025 about 95% below TAC, so there is no indication of a TAC overshoot (SSC, 2025; NMFS, 2025b). Taken together, the 2025 survey result, the 2024 SAFE conclusions, and the reported 2025 catch performance support the conclusion that GOA northern rock sole remained in good condition in 2025 (AFSC, 2025; SSC, 2025; NMFS, 2025b).

- Biomass estimate in 2025: ~31000 mt
- +17.6% from 2023 ↑

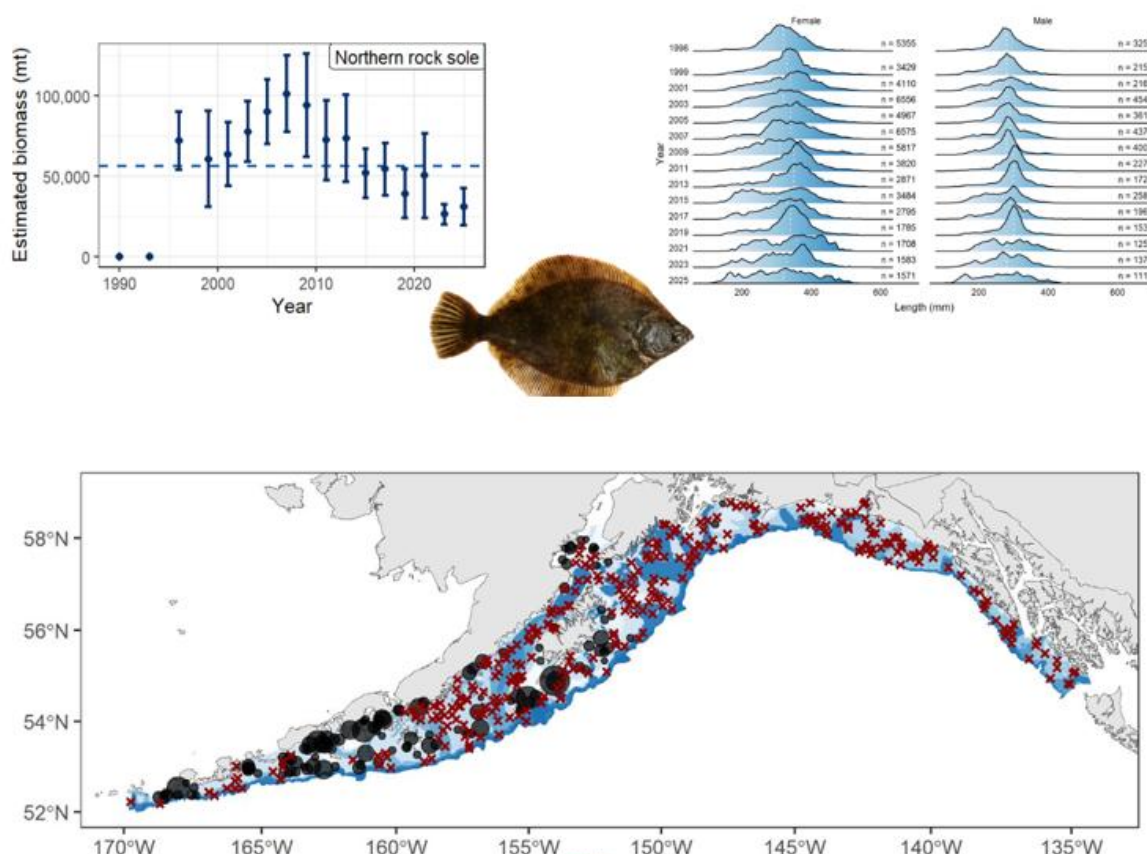


Figure 10. Estimated design-based biomass time series with 95% confidence ranges, estimated design-based length compositions and maps of positive hauls of GOA Northern rock sole the from the 2025 Gulf of Alaska Biennial Bottom Trawl Survey Biomass trends. Source: AFSC, 2025.

BSAI Greenland turbot

For BSAI Greenland turbot, the available evidence indicates that the stock remained in a precautionary but acceptable status in 2025, although the attached figure confirms that survey biomass is still well below the long-term mean (Markowitz et al., 2025; SSC, 2025). The Figure 11 shows an EBS survey biomass estimate of about 5.7 thousand t in 2025, which is a 14% increase from 2024 but still far below the long-term average of about 22 thousand t; the SSC similarly noted that the 2025 EBS bottom trawl survey increased by 14% but remained well below the 1987–2025 average, while Greenland turbot remained rare in the NBS (SSC, 2025). This does not change the underlying stock-status conclusion from the flatfish 2024 RFM Full Assessment Report, which found that the stock was not overfished and not approaching an overfished condition, even though survey biomass had been declining and assessment uncertainty required additional caution (MRAG, 2024). That caution is evident in 2025 management: the SSC reported that the stock continued to be managed with a 25% reduction from maxABC, reflecting ongoing assessment concerns and the lack of slope-survey information, but also concluded that there were no new risk factors warranting any further reduction (SSC, 2025). Catch performance remained clearly within management limits, with the 2025 catch at 618 t against a 2025 TAC of 1,678 t and 2025 ABC of 1,678 t, compared with a 2024 catch of 768 t against a 2024 TAC of 3,188 t; neither Bering Sea nor Aleutian Islands catches were close to exceeding their limits (Markowitz et al., 2025; NMFS, 2025a; SSC, 2025). Taken together, the attached survey figure, the 2024 stock-status determination, and the low recent catches support the conclusion that BSAI Greenland turbot remained under effective precautionary management in 2025, with no evidence of catch overshoot or immediate stock-status failure (Markowitz et al., 2025; NMFS, 2025a; SSC, 2025).

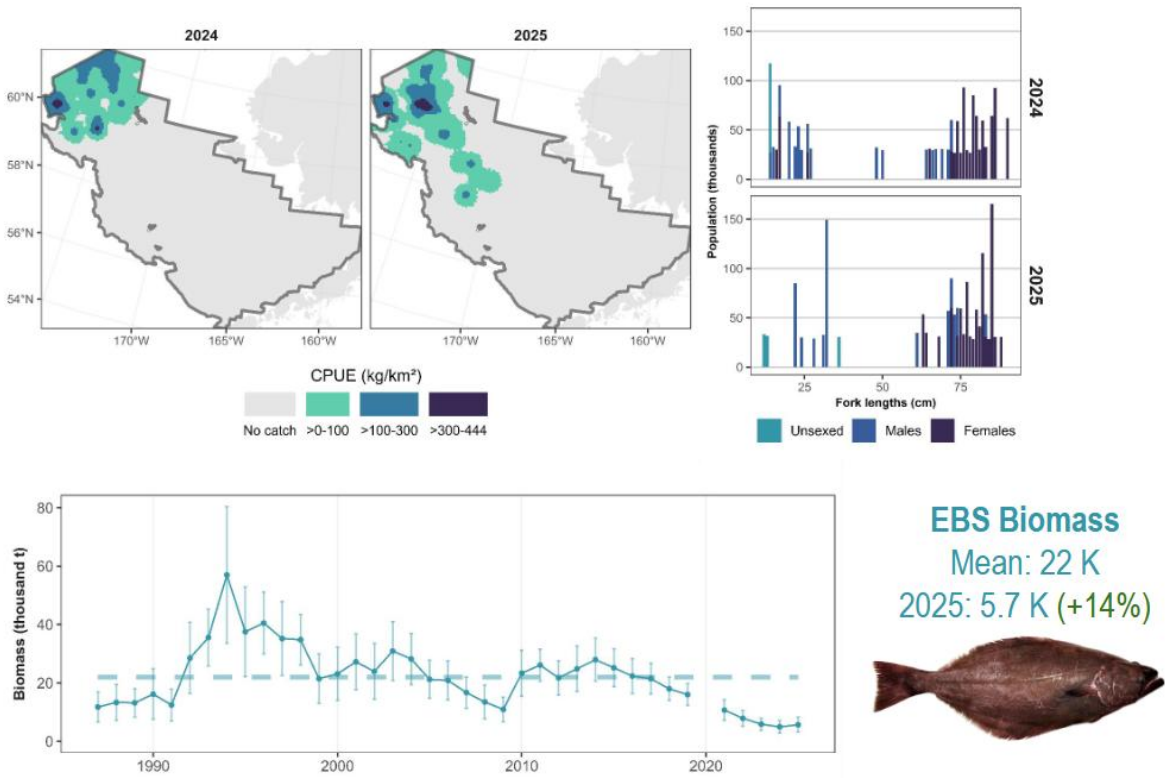


Figure 11. Inverse-distance weighted design-based weight CPUE, estimated design-based length composition, estimated design-based biomass time series with 95% confidence intervals and comparison to 2024 of BSAI Greenland turbot sole from the 2025 Eastern and Northern Bering Sea Bottom Trawl Survey. Source: Markowitz et al., 2025.

4.4.1. Update on fishery catches

The Table 4 shows that, for all certified stocks, 2025 catches remained below the 2025 TAC, indicating that harvests were kept within the established management limits. Catch figures are reported as current through 8 November 2025.

Table 4. Allowable Catch (TAC) and catch data (t = tonnes). Source: SSC, 2025. * = Northern rock sole and Southern rock sole were not reported separately in the 2025 GOA catch report for TAC/catch. Instead, they were included within the combined GOA shallow-water flatfish stock, for which the catch report gives a 2025 TAC of 46,054 t and a 2025 catch of 2,157 t, and a 2024 TAC of 45,478 t with 2024 catch of 2,896 t.

TAC / Catch Data BSAI Alaska plaice	Year	Amount
TAC – USA	Year 2025	15,903 t
UoA share of TAC	Year 2025	15,903 t
Total catch by UoC (most recent year)	Year 2025	6,947 t
Total catch by UoC (second most recent year)	Year 2024	10,399 t
TAC / Catch Data BSAI Arrowtooth Flounder	Year	Amount
TAC - USA	Year 2025	14,000 t
UoA share of TAC	Year 2025	14,000 t
Total catch by UoC (most recent year)	Year 2025	9,024 t
Total catch by UoC (second most recent year)	Year 2024	10,660 t
TAC / Catch Data BSAI Flathead Sole	Year	Amount
TAC - USA	Year 2025	36,000 t
UoA share of TAC	Year 2025	36,000 t
Total catch by UoC (most recent year)	Year 2025	8,432 t

Total catch by UoC (second most recent year)	Year 2024	13,176 t
TAC / Catch Data BSAI Kamchatka Flounder	Year	Amount
TAC - USA	Year 2025	6,800 t
UoA share of TAC	Year 2025	6,800 t
Total catch by UoC (most recent year)	Year 2025	5,038 t
Total catch by UoC (second most recent year)	Year 2024	5,157 t
TAC / Catch Data BSAI Northern Rock Sole	Year	Amount
TAC - USA	Year 2025	67,000 t
UoA share of TAC	Year 2025	67,000 t
Total catch by UoC (most recent year)	Year 2025	39,947 t
Total catch by UoC (second most recent year)	Year 2024	29,855 t
TAC / Catch Data BSAI yellowfin stock	Year	Amount
TAC - USA	Year 2025	135,000 t
UoA share of TAC	Year 2025	135,000 t
Total catch by UoC (most recent year)	Year 2025	80,971 t
Total catch by UoC (second most recent year)	Year 2024	91,192 t
TAC / Catch Data GOA Arrowtooth Flounder	Year	Amount
TAC - USA	Year 2025	100,454 t
UoA share of TAC	Year 2025	100,454 t
Total catch by UoC (most recent year)	Year 2025	13,075 t
Total catch by UoC (second most recent year)	Year 2024	18,182 t
TAC / Catch Data GOA Flathead Sole	Year	Amount
TAC - USA	Year 2025	36,534 t
UoA share of TAC	Year 2025	36,534 t
Total catch by UoC (most recent year)	Year 2025	836 t
Total catch by UoC (second most recent year)	Year 2024	1,035 t
TAC / Catch Data GOA Northern Rock Sole	Year	Amount
TAC - USA	Year 2025	*
UoA share of TAC	Year 2025	*
Total catch by UoC (most recent year)	Year 2025	*
Total catch by UoC (second most recent year)	Year 2024	614 t
TAC / Catch Data GOA Southern Rock Sole	Year	Amount
TAC - USA	Year 2025	*
UoA share of TAC	Year 2025	*
Total catch by UoC (most recent year)	Year 2025	*
Total catch by UoC (second most recent year)	Year 2024	410 t
TAC / Catch Data GOA Rex Sole	Year	Amount
TAC - USA	Year 2025	21,387 t
UoA share of TAC	Year 2025	21,387 t
Total catch by UoC (most recent year)	Year 2025	567 t
Total catch by UoC (second most recent year)	Year 2024	563 t
TAC / Catch Data BSAI Greenland turbot	Year	Amount

TAC - USA	Year 2025	1,678 t
UoA share of TAC	Year 2025	1,678 t
Total catch by UoC (most recent year)	Year 2025	618 t
Total catch by UoC (second most recent year)	Year 2024	768 t

4.4.2. Significant changes in the ecosystem effects of the fishery

Non-target catch updates

The catch composition for landed and discarded primary, secondary, ETP, and habitat-forming species was reviewed for both the BSAI and GOA (Table 5, Table 6). The classification of main and minor species remained the same in the BSAI, whereas in the GOA, Pacific ocean perch (*Sebastes alutus*) and Pacific cod (*Gadus macrocephalus*) both exceeded the 5% threshold, thus changing from minor to main species with the updates to catch data. However, both species are separately MSC certified as Principle 1 stocks in two other fisheries, 1) Aleutian Islands and Bering Sea Atka mackerel, Pacific Ocean perch, and northern rockfish and Gulf of Alaska Pacific ocean perch, northern rockfish, and dusky rockfish, and 2) BSAI and GOA Pacific cod. The addition of these two main species as scoring elements in the GOA would make no material difference to the primary species PI scores, so rescoring was not necessary.

Table 5. Catch composition in the BSAI flatfish trawl fishery. Weights are given in tons. Target species are green, main primary species are yellow, minor species (primary and secondary) are white, and habitat-forming species are orange. Species < 0.01% of catch are aggregated as “other” for brevity. Data are provided by request from NMFS.

Species	2021	2022	2023	2024	Total	%
Yellowfin Sole	106,300	152,543	111,582	90,019	460,444	48.75%
Pollock	31,848	36,127	38,918	39,582	146,475	15.51%
Rock Sole	12,923	16,889	25,104	27,077	81,993	8.68%
Pacific Cod	11,517	14,217	13,604	13,208	52,546	5.56%
Alaska Plaice Flounder	13,864	11,106	14,800	10,187	49,958	5.29%
Flathead Sole	8,262	12,984	7,229	10,820	39,295	4.16%
Arrowtooth Flounder	7,367	6,109	5,221	6,573	25,270	2.68%
Kamchatka Flounder	5,735	7,520	5,908	3,177	22,339	2.36%
Skate, Alaska	4,313	4,080	2,992	2,604	13,989	1.48%
Sculpin	2,378	1,987	1,915	1,589	7,869	0.83%
Sablefish (blackcod)	1,340	1,902	2,117	980	6,340	0.67%
Giant Grenadier	1,922	1,375	1,763	664	5,722	0.61%
Sea star	2,030	1,635	1,142	835	5,642	0.60%
Pacific Ocean Perch	1,550	1,347	1,249	939	5,086	0.54%
Starry Flounder	1,223	921	707	1,021	3,872	0.41%
Greenland Turbot	1,367	1,219	898	256	3,740	0.40%
Rex Sole	600	489	959	484	2,532	0.27%
Scypho jellies	696	316	405	715	2,132	0.23%
Atka Mackerel	88	172	554	954	1,767	0.19%
Squid	210	145	504	123	983	0.10%
Thornyhead Rockfish (Idiots)	203	312	253	69	837	0.09%
Butter Sole	48	238	202	289	776	0.08%
Skate, Whiteblotched	126	167	226	171	690	0.07%
Benthic urochordata	191	253	181	54	679	0.07%
Skate, Aleutian	166	108	188	94	556	0.06%
Northern Rockfish	5	179	142	27	353	0.04%
Shortraker Rockfish	194	77	35	11	317	0.03%
Grenadier - Rattail Grenadier Unidentified	5	275	6	1	288	0.03%
Rougheye Rockfish	72	54	92	44	262	0.03%
Misc fish	77	61	76	44	259	0.03%

Skate, Other	70	73	63	51	256	0.03%
Sea anemone unidentified	110	42	63	34	249	0.03%
Eelpouts	43	40	52	40	175	0.02%
Skate, Big	34	9	8	94	145	0.02%
Snails	50	51	25	11	137	0.01%
Miscellaneous Flatfish	25	15	36	35	111	0.01%
urchins dollars cucumbers	15	26	27	12	81	0.01%
Shark, pacific sleeper	13	29	20	7	68	0.01%
Other	76	80	99	63	318	0.03%
Total	217,056	275,172	239,366	212,958	944,551	100.00%

Table 6. Catch composition in the GOA flatfish trawl fishery. Weights are given in tons. Target species are green, main primary species are yellow, minor species (primary and secondary) are white, and habitat-forming species are orange. Species < 0.01% of catch are aggregated as "other" for brevity. Data are provided by request from NMFS.

Species	2021	2022	2023	2024	Total	%
Arrowtooth Flounder	5,953	7,416	7,168	15,484	36,020	65.02%
Pacific Ocean Perch	697	843	887	927	3,354	6.06%
Pacific Cod	635	660	651	1,138	3,084	5.57%
Rock Sole	1,062	725	427	455	2,669	4.82%
Pollock	385	251	269	1,066	1,971	3.56%
Flathead Sole	440	408	292	746	1,886	3.40%
Rex Sole	147	536	265	439	1,387	2.50%
Sablefish (blackcod)	327	478	277	294	1,376	2.48%
English Sole	124	70	171	363	729	1.32%
Dusky Rockfish	215	45	332	93	686	1.24%
Butter Sole	288	127	33	76	525	0.95%
Skate, Big	31	39	90	161	321	0.58%
Northern Rockfish	67	82	42	81	272	0.49%
Atka Mackerel	258	12			270	0.49%
Dover Sole	31	65	28	49	173	0.31%
Shark, pacific sleeper	30	18	65	13	126	0.23%
Skate, Longnose	38	15	18	46	117	0.21%
Shark, spiny dogfish	16	7	10	51	83	0.15%
Thornyhead Rockfish (Idiots)	24	40		3	68	0.12%
Rougheye Rockfish	22	3	7	24	55	0.10%
Starry Flounder			38	16	55	0.10%
Skate, Aleutian	14	15	4	14	47	0.08%
Skate, Other	7	9	2	11	29	0.05%
Kamchatka Flounder	17	0		5	21	0.04%
Shortraker Rockfish		10	3	5	18	0.03%
Yelloweye Rockfish	4	3	3	7	17	0.03%
Harlequin Rockfish	4	7		2	13	0.02%
Redbanded Rockfish	3	2		1	6	0.01%
Octopus			3	3	6	0.01%
Miscellaneous Flatfish				6	6	0.01%
Other	5	0	0	2	8	0.01%
Total	10,843	11,884	11,087	21,583	55,396	100.00%

Catches of Prohibited Species (PSC; species that must be discarded if caught; Table 7, Table 8) were also reviewed for both the BSAI and GOA fisheries as they are accounted for separately from the rest of the catch composition. The

retention prohibition on these species is for management purposes rather than designation of ETP status, as targeted fisheries exist for all of them. (While some Chinook salmon populations are ESA-listed, they are all in the continental US, and an ongoing review of some Alaska populations proposed for listing has not yet concluded.) Since the order of magnitude of catch for each PSC species in *individuals* is less than or equal to the order of magnitude of catch for all species combined in *tons*, it can be reasonably inferred that these PSC species are <5% of catch weight and thus minor species. The weight of halibut and herring catches would place them below 2% of total catch in the tables above, so they are minor species as well.

Table 7. Catches of prohibited species in the BSAI flatfish trawl fishery. Units are numbers of individuals except for herring and halibut which are measured in tons. All species are primary minor. Data are provided by request from NMFS.

Species	2021	2022	2023	2024	Total
Bairdi Tanner Crab	563,311	429,752	549,948	447,336	1,990,346
Opilio Tanner Crab	226,686	201,881	771,713	532,860	1,733,140
Red King Crab	40,000	8,290	12,919	22,480	83,689
Golden King Crab	9,167	7,049	8,401	2,358	26,975
Chinook Salmon	1,147	258	671	1,258	3,334
Non-Chinook Salmon	1,851	581	185	286	2,903
Blue King Crab	361	453	36	143	993
Halibut (t)	1,095	1,545	1,261	1,207	5,108
Herring (t)	170	40	221	80	511

Table 8. Catches of prohibited species in the GOA flatfish trawl fishery. Units are numbers of individuals except for herring and halibut which are measured in tons. All species are primary minor. Data are provided by request from NMFS.

Species	2021	2022	2023	2024	Total
Bairdi Tanner Crab	9,439	5,226	11,943	31,961	58,569
Chinook Salmon	1,005	206	650	1,391	3,252
Non-Chinook Salmon	779	205	760	834	2,577
Red King Crab	0	0	0	538	538
Golden King Crab	1	0	0	23	24
Blue King Crab	0	0	0	0	0
Opilio Tanner Crab	0	0	0	0	0
Halibut (t)	122	191	185	351	849
Herring (t)	2	1	1	2	6

Lastly, there are several additional secondary and ETP species with which the fishery interacts that are not measured by weight in the catch composition. These include marine mammals and seabirds which are recorded as individual counts in the catch data. The only catches of these species in the 2021-2024 flatfish trawl data were an estimated 163 unidentified birds in 2022 and an estimated 119 northern fulmar in 2021. However, the MSC standard indicates that primary and secondary species are designated from the species that make up the catch (SA3.1.4), whereas ETP species are designated from the species that are “vulnerable to being impacted by the fishery in the assessment area” (GSA3.1.5). Thus, the team also considered broader data regarding seabird vulnerability to trawling in the BSAI and GOA, as well as the updated MMPA List of Fisheries.

Updated seabird mortality data for all Alaskan groundfish and halibut fisheries combined are available in NMFS (2024) but not as a disaggregated table that could be used to identify interactions with flatfish and/or demersal trawl fisheries. The latest available seabird interaction data at the flatfish fishery level remains Tide and Eich (2022), which is summarized in Table 9. At both the fishery and trawl sector levels, the largest number of interactions continues to be with shearwaters and fulmars, neither of which are threatened, endangered or otherwise of conservation concern. The March 8, 2021, USFWS Biological Opinion for Alaskan groundfish fisheries also provides incidental take statements for potentially vulnerable ESA-listed seabirds in the area:

- The reported take should not exceed six short-tailed albatrosses in a 2-year period.
- The reported take should not exceed 25 spectacled eiders in a floating 4-year period.
- The reported take should not exceed three Steller’s eiders in a floating 4-year period.

These three incidental take statements for ESA-listed seabirds have not been exceeded by all groundfish fisheries at the time of publication of the latest NMFS seabird report (April 2024) and there were no reported takes of ESA-listed threatened spectacled eider (*Somateria fischeri*) or threatened Alaska-breeding population of Steller's eider (*Polysticta stelleri*) in 2023 (NMFS 2024). No relevant updates were noted to population trend or status estimates for seabird species.

Table 9. Seabird bycatch associated with the flatfish UoA. Adapted from Table 13 in Tide and Eich (2022) by summing across any flatfish target species (including all P1 species and Greenland turbot, a primary minor species).

Species/group	Area	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	Avg.
Northern fulmar	GOA	0	0	143	0	0	0	0	104	0	0	0	22
	BSAI	59	199	197	14	221	166	219	50	0	40	129	118
Shearwaters	BSAI	0	0	0	69	56	45	0	0	1	0	49	20
Gulls	BSAI	0	0	0	0	0	0	0	1	0	0	0	0
Auklets	BSAI	0	0	0	66	0	0	0	0	0	0	0	6
Murres	BSAI	0	0	0	44	0	39	0	0	0	0	0	8
Other birds	BSAI	0	0	0	0	0	0	63	0	0	0	0	6

There are 12 marine mammal species (constituting 16 populations) on the most recent MMPA List of Fisheries (NOAA Fisheries 2024) known to interact with the flatfish fishery: bearded seal (Beringia), gray whale (Eastern North Pacific), harbor porpoise (Bering Sea), harbor seal (Bristol Bay; Cook Inlet/Shelikof Strait; North Kodiak; South Kodiak), humpback whale (Western North Pacific), killer whale (Eastern North Pacific Alaska resident; GOA, AI, BS transient), northern fur seal (Eastern Pacific), ribbon seal, ringed seal (Arctic), spotted seal (Bering), Steller sea lion (Western US), and walrus (AK). Of the three categories of incidental death or serious injury represented by the LOF (I = frequent, II = occasional, III = remotely likely/no known), the BSAI fishery is listed as Category II and the GOA fishery is listed as Category III. Steller sea lion and harbor seal are listed under both fisheries, while the other species are listed only under the BSAI fishery. No relevant updates were noted to population trend or status estimates for marine mammal species; the most recent NMFS assessment reports available for all species were from 2023 or earlier (NOAA Fisheries 2025).

Given the minor changes to catch composition information and the absence of substantial updates to status information for non-target species, rescoring was not necessary for primary, secondary, or ETP species PIs.

Habitats and Ecosystem

The Essential Fish Habitat 5-year Review Plan is set to be conducted in 2028. At the December 2025 meeting, the Council reviewed and advanced the workplan and agreed that the approach reflects the current priorities of the Council and NMFS. As specified in the regulations and guidelines that implement the EFH provisions of the Magnuson Stevens Fishery Conservation and Management Act (MSA), the Councils and NMFS are required to review the EFH components of Fishery Management Plans (FMPs) and revise or amend these components based on available information at least every five years (NPFMC, 2026j).

The following text was taken from the GOA 2025 Ecosystem Status Report (Ferriss, et al. 2026):

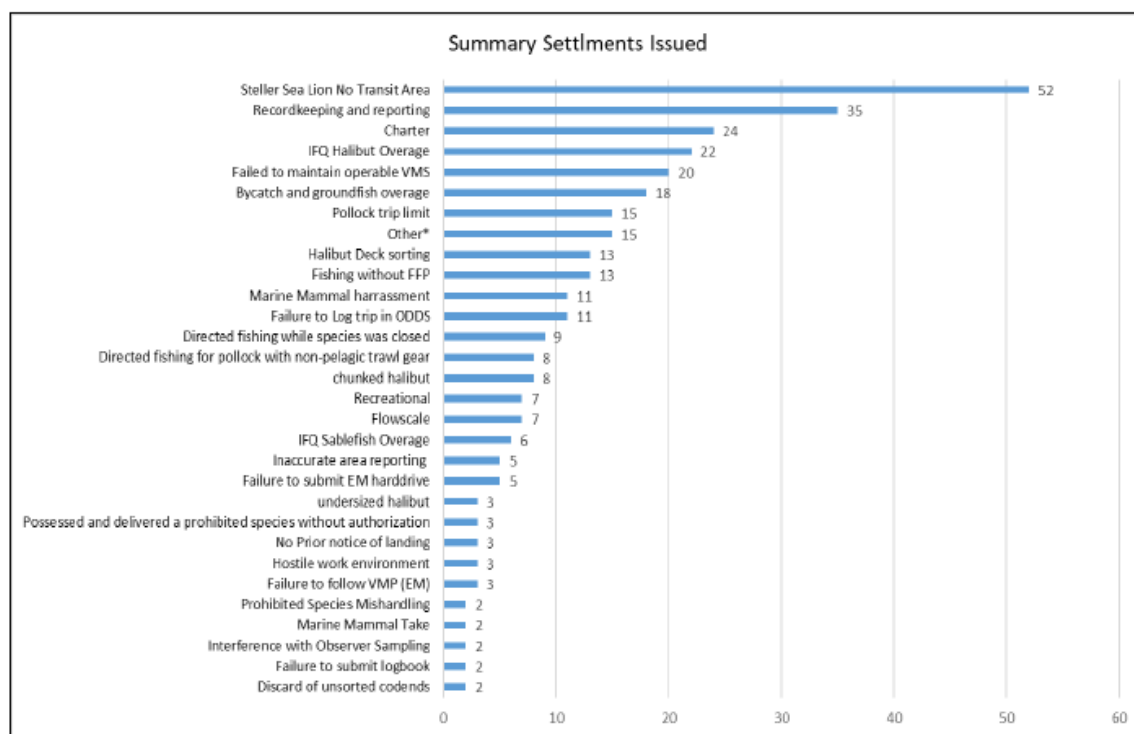
The Gulf of Alaska's (GOA) 2025 marine ecosystem was characterized by warm waters at the surface and at depth for much of the year, with signs of reduced lower trophic level production, relative to 2024. Fewer signs of warm water impacts were observed in higher trophic levels. The warm water came from two sources: warm waters in the northwest Pacific transported via strong winter winds from the west onto the shelf, and from upwelled warm waters at the center of the North Pacific subarctic gyre. The La Niña event in the winter of 2024/2025 increased gyre circulation bringing these warm upwelled waters onto the shelf and did not result in the anticipated cooling associated with La Niña's past. The GOA had characteristics of a warm ecosystem (including similarities to 2019, the most recent year dominated by warmer waters), especially within the faster-responding lower trophic levels. Examples of these warm characteristics included a phytoplankton community dominated by smaller celled organisms indicating less efficient energy transfer, increased biomass of smaller copepods versus larger copepods, increased frequency of harmful algal blooms, and reduced body condition in certain groundfish species and Glacier Bay humpback whales. Numerous indicators reflected a productive system at higher trophic levels, perhaps due to delayed food web impacts, including elevated biomass of lipid-rich euphausiids, continued presence of certain forage fish species (capelin, and Sita and Craig populations, and above-average seabird reproductive success. In considering similarities to the 2014/2016 GOA ecosystem, associated with the decline of the GOA Pacific cod population, similarities exist in bottom temperature and lower trophic level indicators, but these similarities did not occur throughout the ecosystem. Many ecosystem responses to the 2014– 2016 marine heatwave were only observed to occur in 2015, the second consecutive year of the event (e.g., decline of capelin and herring and seabird die-offs). Sea surface temperatures in the fall of 2025 continued to be above or near the marine heatwave threshold, making the rapid dissipation of heat (especially at

depth) less likely. The possibility of a continued response to extended warming in the GOA shelf marine ecosystem in 2026 could include cumulative effects that extend further through the food web.

The Ecosystem Status Report for the Eastern Bering Sea and the Aleutian Islands was not updated in 2025.

4.4.3. Violations and enforcement information

The NOAA Office of Law Enforcement (OLE) Alaska Division Report to the North Pacific Fishery Management Council (December 2024), enforcement activities continued across Alaska fisheries during the reporting period. From October 1, 2023, to September 30, 2024, NOAA officers and agents opened 1,599 incidents, including 913 under the Magnuson-Stevens Fishery Conservation and Management Act (MSA), 411 under the Northern Pacific Halibut Act, 120 under the Endangered Species Act, and 95 under the Marine Mammal Protection Act, among others. Of the 1,003 incidents closed during this period, 551 recorded no violation and required no enforcement action, while 267 incidents remained open or under investigation (NOAA OLE, 2024). The following figure shows the summary settlement issued during this period (Figure 12).



**Other includes multiple types of violations resulting in only one summary settlement count being issued.*

Figure 12. Summary Settlement Counts Issued from October 1, 2023, to September 30, 2024 (NOAA OLE, 2024).

More recent information from the NOAA OLE Alaska Division Report to the Council (December 2025) indicates that enforcement activity continued. From October 1, 2024, to September 30, 2025, NOAA officers and agents opened 2,256 incidents, including 1,556 related to the Magnuson-Stevens Act, 397 under the Northern Pacific Halibut Act, 104 under the Endangered Species Act, and 105 under the Marine Mammal Protection Act. Of the 1,995 incidents closed during the period, 802 recorded no violations, while 261 incidents remained under investigation (NOAA OLE, 2025). The following figure shows the summary settlement issued during this period (Figure 13).

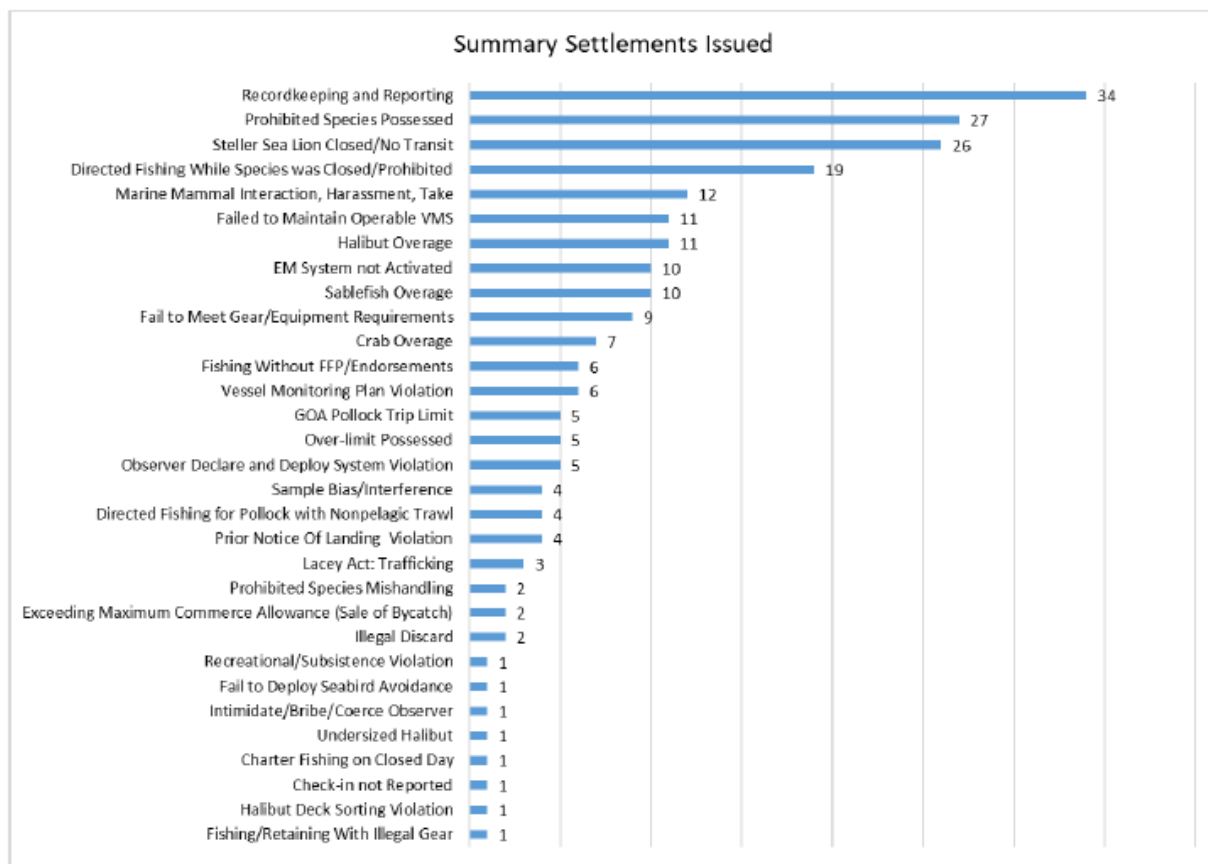


Figure 13. Summary Settlement Counts Issued from October 1, 2024, to September 30, 2025 (NOAA OLE, 2025).

Both reports also document continued patrol activity and inspections throughout Alaska waters through coordinated patrols, inspections, and outreach with partner agencies such as the U.S. Coast Guard and Alaska Wildlife Troopers. Enforcement activities included multi-day patrols, dockside inspections, and joint enforcement operations with federal and state agencies, resulting in vessel boardings and the detection of federal violations. These activities demonstrate continued enforcement presence and coordination among agencies responsible for fisheries compliance.

Joint enforcement efforts between NOAA OLE and the Alaska Wildlife Troopers continued through the Joint Enforcement Agreement, which supports enforcement of federal laws including the Magnuson-Stevens Act, Marine Mammal Protection Act, Endangered Species Act, and the Northern Pacific Halibut Act. AWT reported actions directly supporting NOAA OLE and marine resource protection. The NOAA OLE 2024 report indicates that Alaska Wildlife Troopers conducted 257 vessel boardings, 930 field contacts, and approximately 1,500 outreach contacts in FY2024, detecting 114 federal violations. In the subsequent NOAA OLE 2025 report, Alaska Wildlife Troopers conducted 291 vessel boardings and 1,114 field contacts, detecting 86 federal violations, further supporting federal fisheries enforcement activities.

A review of the NOAA Office of the General Counsel's enforcement website¹ was conducted. During the 2025 calendar year, at least four Notices of Violation and Assessment (NOVAs) were issued to vessels or companies operating within the Units of Assessment (UoAs) for this fishery. These incidents are detailed below:

-AK2306853; *F/V Alaska Victory* – Owner *AK Victory, Inc.* and Operator *David D. Bishop* were charged jointly and severally under the Magnuson-Stevens Act with failing to comply with Vessel Monitoring System requirements. A \$36,000 NOVA was issued, and the case settled for \$32,400 (NOAA, 2026e).

-AK2307659; *C/P Defender* – Owner *O'Hara Corporation* and Operator *Dean Slater* were charged jointly and severally under the Magnuson-Stevens Act with directed fishing in an Atka Mackerel no fishing zone. An \$89,834 NOVA was issued (NOAA, 2026e).

-AK2307659B; *C/P Defender* – Owner *O'Hara Corporation* and Operator *Michael Burgett* were charged jointly and severally under the Magnuson-Stevens Act with directed fishing in an Atka Mackerel no fishing zone. A \$102,137 NOVA was issued (NOAA, 2026e).

¹ <https://www.noaa.gov/general-counsel/gc-enforcement-section>

AK2404901; FT US Intrepid – Owner U.S. Fishing, LLC and Operator Erin Blaine Moore were charged jointly and severally under the Magnuson-Stevens Act with failing to comply with Vessel Monitoring System requirements and for failing to submit two product transfer reports as required. A \$38,000 NOVA was issued (NOAA, 2026e).

Overall, OLE reports and enforcement information indicate continued enforcement capacity and monitoring of fisheries operating in Alaska waters through patrols, inspections, incident investigations, and collaboration with partner enforcement agencies.

4.4.4. Other information that may affect the outcome of certification

No other information was identified during the surveillance assessment that could affect the outcome of the certification.

5. Update on consistency to the fundamental clauses of CSI's RFM Fishery Standard

5.1. Section A: the Fisheries Management System

5.1.1. Fundamental Clause 1: Structured and legally mandated management system

- 1. There shall be a structured and legally mandated management system based upon and respecting International, National and local fishery laws, for the responsible utilization of the stock under consideration and conservation of the marine environment.*

	1.1 <u>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.</u>
	1.2 <u>Management measures shall consider (1) stock status and genetic diversity over its entire area of distribution, and (2) other biological characteristics of the fish stock including age of maturity and reproductive potential.</u> 1.2.1 <u>Previously agreed management measures established and applied in the same region shall be taken into account by management.</u>
	1.3 <u>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.</u> 1.3.1 <u>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.</u>
	1.4 <u>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.</u> 1.4.1 <u>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.</u>
	1.5 <u>The applicant fishery's 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.</u>
	1.6 <u>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.</u> 1.6.1 <u>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.</u>
	1.7 <u>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.</u>
	1.8 <u>The management arrangements and decision-making processes for the fishery shall be organized in a transparent manner.</u>
	1.9 <u>Management organizations not party to the Agreement to Promote Compliance with International Conservation and Management Measures by Vessels Fishing on the High Seas shall be encouraged to accept the Agreement and to adopt laws and regulations consistent with the provisions of the Agreement.</u>
Summary of relevant changes	The fishery continues to operate within a structured, legally mandated fisheries management system established by the Magnuson–Stevens Fishery Conservation and Management Act (MSA), consistent with relevant international principles for responsible fisheries management. The Act is implemented by the National Marine Fisheries Service

(NMFS) through federal Fishery Management Plans (FMPs) developed by the North Pacific Fishery Management Council (NPFMC). NMFS is responsible for evaluating the status of federally managed fisheries in the Gulf of Alaska (GOA) and Bering Sea and Aleutian Islands (BSAI), including the preparation of annual Stock Assessment and Fishery Evaluation (SAFE) reports. The Council works closely with the Alaska Department of Fish and Game (ADFG) and the Alaska Board of Fisheries (BOF) to coordinate management programs in federal and state waters (0-3 nm from shore).

The Council has continued to carry out its regular management functions, meeting periodically to review scientific advice, consider management measures, and provide recommendations for the federal fisheries under its jurisdiction. (e.g., NPFMC, 2026, 2026b).

The BSAI FMP has been amended more than 100 times since its adoption. The most recent amendment includes Amendment 125 (NOAA Fisheries, 2026; BSAI FMP 2024) to the BSAI Groundfish FMP, introducing a small vessel provision for the Pacific cod jig sector during the A season (January 1–April 30). Under this provision, Pacific cod catch from catcher vessels ≤ 55 ft using hook-and-line or pot gear is counted toward the jig sector allocation. The measure aims to improve stability and opportunities for small vessels while supporting the objectives of the Magnuson-Stevens Act and the BSAI FMP (NOAA Fisheries, 2026).

Similarly, the GOA FMP has undergone over 100 amendments, with the latest updates made in 2024 (NOAA Fisheries, 2026b; GOA FMP 2024). The most recent amendment relevant to the GOA FMP is Amendment 115, approved in July 2024. This amendment to the Fishery Management Plan for Groundfish of the Gulf of Alaska was part of a broader set of amendments affecting multiple Alaska FMPs, including Amendment 127 to the BSAI groundfish FMP. These amendments updated the description and identification of essential fish habitat (EFH) and information on adverse effects on EFH from fishing and non-fishing activities, based on the best available scientific data. These actions aimed to support the goals and objectives of the Magnuson-Stevens Act, the relevant FMPs, and other applicable laws (NOAA Fisheries, 2026b).

The management framework continued to be supported by an established scientific and advisory process to ensure the responsible utilization of fishery resources and the conservation of the marine environment. Stock assessments incorporate comprehensive catch data, including retained catch and discards, and are informed by observer data and fishery-independent surveys. SAFE reports provide updates on stock status and inform the development of harvest specifications, including overfishing limits (OFL), acceptable biological catch (ABC), and total allowable catch (TAC) (e.g., BSAI: Bryan et al., 2024, 2024b; Cronin-Fine, 2024; Sullivan et al., 2024; Spender & Ianelli, 2024b; Spender & Ianelli, 2024; GOA: Kapur, 2024; McGilliard, 2024; Shotwell et al., 2024; William et al., 2024; William et al., 2024b; Omori et al., 2024).

Management decisions continue to be regularly reviewed through established Council processes, including evaluation by the Scientific and Statistical Committee (SSC) and public consultation. The Council (and NMFS), along with the Board of Fisheries (BOF) and the Alaska Department of Fish and Game (ADF&G), continue to provide extensive information on their websites, such as meeting agendas, discussion papers, and records of decisions. Both the Council and the BOF actively promote stakeholder participation, and all deliberations are held in open, public meetings (e.g., NPFMC, 2026c, 2026d; BOF, 2026, 2026b).

Fisheries management and conservation in the United States, including Alaska, are mainly funded through federal and state appropriations that follow established budget cycles. At the federal level, NOAA sets its annual budget and allocates funds to NMFS, which supports essential functions such as stock assessments, monitoring programs, and enforcement activities (NOAA, 2026). At the state level, the ADFG is funded by state appropriations to support management, research, and monitoring of fisheries within state waters (ADFG, 2026). Additionally, cost recovery systems are in place for specific fleet sectors, including groundfish fisheries in the BSAI and GOA, where industry contributions help cover management, data collection, and enforcement costs (e.g., ADP, 2025, 2026).

	The fishery operates within the EEZ and the flatfish stocks in Alaska are not considered to be transboundary, straddling, highly migratory, or high seas stocks and so clauses 1.3, 1.3.1, 1.4, 1.4.1, 1.5, 1.6.1, and 1.9 are not applicable.
Statement whether the fishery continues to conform to CSI's RFM Fishery Standard Fundamental Clause	Based on the information reviewed during the surveillance audit, there are no changes in the legal or administrative management framework that would detrimentally affect the fishery's performance with respect to Fundamental Clause 1. The fishery, therefore, continues to conform to CSI's RFM Fisheries Standard for this clause.

5.1.2. Fundamental Clause 2: Coastal area management frameworks

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	<u>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.</u>
2.1.1	<u>States shall establish mechanisms for cooperation and coordination in planning, development, conservation, and management of coastal areas.</u>
2.1.2	<u>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.</u>
2.2	<u>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 management process.</u>
2.3	<u>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.</u>
2.4	<u>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.</u>
2.5	<u>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.</u>
2.6	<u>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.</u>
2.7	<u>In the case of 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.</u>

Summary of relevant changes	No changes have been identified in how NMFS, the NPFMC, and the ADF&G participate in coastal management-related processes, including those established under the National Environmental Policy Act (NEPA). Coordination between federal and state authorities remains in place. Stakeholder participation and transparency continue to be supported through the Council and BOF processes. Meetings have continued to be held regularly, with information such as agendas, discussion documents, and decisions made publicly available. These processes continue to facilitate consultation with fishery representatives and ensure dissemination of management measures and regulatory updates (e.g., NPFMC, 2026c, 2026d; BOF, 2026, 2026b). The ecosystem-based fisheries management approach adopted by the Council remains unchanged and continues to consider interactions within the broader marine ecosystem (NPFMC, 2026e). In addition, monitoring and research of the coastal environment in Alaska continue to be carried out by multiple federal and state agencies, and academic institutions (e.g., ADEC, 2026; ADFG, 2026b, 2026c; NOAA, 2026b, 2026c, 2026d). The Oil Spill Task Force, Department of Environmental Conservation of the State of Alaska, continued to conduct research into oil spills and their effects on the Alaskan environment, particularly the natural resources (ADEC, 2026b).
Statement whether the fishery continues to conform to CSI's RFM Fishery Standard Fundamental Clause 2	Based on the information reviewed during the surveillance audit, there are no changes in the Coastal Area Management Frameworks that would detrimentally affect the fishery's performance with respect to Fundamental Clause 2. The fishery, therefore, continues to conform to CSI's RFM Fisheries Standard for this clause.

5.1.3. Fundamental Clause 3: Management objectives and plan

3. <i>Management objectives shall be implemented through management rules and actions formulated in a plan or other framework.</i>	
3.1	<u>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.</u>
3.1.1	<u>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.</u>
3.1.2	<u>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.</u>
3.1.3	<u>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.</u>
3.2	<u>Management measures shall provide, <i>inter alia</i>, that:</u>
3.2.1	<u>Excess fishing capacity shall be avoided and exploitation of the stocks shall remain economically viable.</u>
3.2.2	<u>The economic conditions under which fishing industries operate shall promote responsible fisheries.</u>
3.2.3	<u>The interests of fishers, including those engaged in subsistence, small-scale, and artisanal fisheries shall be taken into account.</u>
3.2.4	<u>Biodiversity of aquatic ecosystems shall be conserved and ETP species shall be protected. Where relevant, there shall be pertinent objectives, and as necessary, management measures.</u>

Summary of relevant changes	There have been no significant changes since the 2025 reassessment in relation to the Magnuson–Stevens Act or National Standards (although a proposal is currently under review for National Standards 4, 8, and 9, NOAA Fisheries, 2026c). Management objectives for groundfish fisheries established by the Council remain unchanged. The Council continues to develop annual harvest specifications, including OFL, ABC, and TAC, based on the most recent scientific advice (NPFMC, 2026f). In December 2025, the North Pacific Fishery Management Council adopted the 2026–2027 groundfish harvest specifications for the BSAI and GOA groundfish fisheries, based on advice from its Scientific and Statistical Committee (SSC) (NPFMC, 2026c). Due to the government shutdown, some stock assessments scheduled for 2025 were not completed. As a result, the SSC relied on the most recent peer-reviewed 2024 SAFE reports and associated 2026 projections, together with updated information from 2025 catch reports, ecosystem status information, and contextual information from the 2025 BSAI and GOA bottom trawl surveys (NPFMC, 2026k). The SSC reviewed the available information for each stock and stock complex to determine whether additional precautionary buffers were warranted beyond those proposed in October 2025. No new conservation concerns were identified that would justify additional harvest reductions. None of the groundfish stocks were classified as overfished in 2024, and overfishing was not occurring in 2024 or 2025 (NPFMC, 2026k). No changes have been identified in fishing areas or spatial management measures for groundfish fisheries, and no amendments to the relevant FMPs have been implemented since 2024. The Council is currently undertaking a Groundfish Management Policy review process, which is a routine requirement of the FMPs conducted approximately every three years to support adaptive management. This process provides an opportunity to review the Management Policy, evaluate Council actions relative to its objectives, and consider potential modifications or additional actions. The current review, covering the period 2022–2025, is ongoing, and at the time of the surveillance audit, no changes to management objectives or their implementation had been made (NPFMC, 2026g).
Statement whether the fishery continues to conform to CSI's RFM Fishery Standard Fundamental Clause 3	Based on the information reviewed during the surveillance audit, there are no changes in the management objectives and planning framework that would detrimentally affect the fishery's performance with respect to Fundamental Clause 3. The fishery, therefore, continues to conform to CSI's RFM Fisheries Standard for this clause.

5.2. Section B: Science & Stock Assessment Activities, and the Precautionary Approach

5.2.1. Fundamental Clause 4: Fishery data

4. <i>There shall be effective fishery data (dependent and independent) collection and analysis systems for stock management purposes. .</i>
4.1 <u>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.</u>
4.1.1 <u>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.</u>
4.1.2 <u>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.</u>
4.2 <u>An observer scheme designed to collect accurate data for research and support compliance with applicable fishery management measures shall be established.</u>
4.2.1 <u>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.</u>
4.3 <u>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.</u>
4.4 <u>States shall stimulate the research required to support national policies related to fish as food.</u>
4.5 <u>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.</u>
4.6 <u>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.</u>
4.7 <u>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.</u>
4.8 <u>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.</u>
4.9 <u>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.</u>
4.10 <u>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.</u>

4.11	<u>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.</u>
Summary of relevant changes	For RFM Section B, Fundamental Clause 4 (Fishery data), the evidence available for the surveillance audit, together with information gathered during the site visit, indicates no material change in the underlying fishery-dependent and fishery-independent data systems for the Alaska flatfish complex that is composed by BSAI and GOA arrowtooth flounder, BSAI Kamchatka flounder, BSAI Alaska plaice, BSAI and GOA flathead sole, BSAI northern rock sole, GOA northern and southern rock sole, BSAI yellowfin sole, GOA rex sole, and BSAI Greenland turbot, relative to the basis of the 2024 RFM Full Assessment Report (MRAG, 2024). The principal relevant development in 2025–2026 was procedural rather than substantive. Stakeholder input indicated that the federal shutdown disrupted the timing of the normal 2025 science and review cycle but did not result in notable changes to routine data collection; observer deployment and data collection continued, although observer debriefings were temporarily delayed before being caught up (SSC, 2025). Fishery-independent data collection also continued during 2025, including the 2025 Eastern and Northern Bering Sea bottom trawl survey and the 2025 Gulf of Alaska bottom trawl survey, both of which provided updated abundance and distribution information relevant to the flatfish stocks (Markowitz et al., 2025; AFSC, 2025). In addition, the AFSC’s February 2026 planning brief shows that survey and assessment activities are entering a period of forward-looking prioritization because of staffing and resource constraints, but this is best understood as a prospective planning issue rather than evidence that the Clause 4 data system had become ineffective; the brief continues to treat survey, assessment, and ecosystem science as core management functions and does not support reduced GOA survey intensity (Foy, 2026). On that basis, the most defensible conclusion is that Fundamental Clause 4 remained effectively met for the flatfish stocks considered, with the only notable change being a temporary disruption to processing and assessment timing, rather than any breakdown in the collection, continuity, or availability of core fishery data (Foy, 2026).
Statement whether the fishery continues to conform to CSI’s RFM CSI Fishery Standard Fundamental Clause 4	There are no changes in the management of fisheries that would detrimentally affect performance against the confidence ratings for the fundamental clauses and any supporting clauses.

5.2.2. Fundamental Clause 5: Stock assessment

5. <i>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.</i>	
5.1	<u>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.</u>
5.1.1	<u>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.</u>
5.1.2	<u>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.</u>
5.2	<u>There shall be established research capacity necessary to assess and monitor (1) the effects of climate or environment change on stocks and aquatic ecosystems, (2) the state of the stock under State jurisdiction, and (3) the impacts of ecosystem changes resulting from fishing activity, pollution, or habitat alteration.</u>

	5.3 <u>Management organizations shall cooperate with relevant international organizations to encourage research in order to ensure optimum utilization of fishery resources.</u>
	5.4 <u>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.</u>
	5.5 <u>Data generated by research shall be analysed and the results of such analyses published in a way that ensures confidentiality is respected, where appropriate.</u>
Summary of relevant changes	For Fundamental Clause 5 of RFM Section B, the main change for the Alaska flatfish complex since the 2024 RFM Full Assessment Report is best characterized as procedural rather than substantive. The existing RFM assessment already found full conformance for the stock-assessment framework for these flatfish stocks, including Supporting Clauses 5.1, 5.1.2, 5.2, 5.3, and 5.5, and described a system based on AFSC-led stock assessments, review through the SSC and related Council review bodies, and publication of assessment outputs through the SAFE process and related documentation (MRAG, 2024). The 2024 RFM report also concluded that the fishery remained in full conformance for Section B overall, with no non-conformances and no clauses rescored (MRAG, 2024). The evidence now available does not indicate that this institutional or scientific framework has materially changed or deteriorated. The key issue in 2025 was the U.S. federal government shutdown / lapse in appropriations, which interrupted the normal timing of the stock-assessment and review cycle (SSC, 2025; NMFS, 2026). In October 2025, the SSC recorded that AFSC had developed a tiered contingency approach for completing groundfish assessments depending on the duration of the shutdown and warned that an extended shutdown could require some preliminary specifications to be rolled over (SSC, 2025). That is effectively what occurred. The December 2025 SSC report states that AFSC authors were unable to complete the 2025 groundfish operational assessments and that the Groundfish Plan Teams did not convene in November; the SSC therefore worked from the most recent fully peer-reviewed SAFE reports, together with catch reports, survey information, ecosystem material, and other available evidence (SSC, 2026). NMFS later confirmed in the 2026 harvest specifications rule that, because the 2025 assessments were not completed in time, the November Plan Team review did not occur and the Council and SSC relied on the 2024 SAFE reports and other best scientific information available (NMFS, 2026). This does not indicate a failure of Clause 5, because the system continued to operate through its established scientific and precautionary framework rather than proceeding without scientific advice (SSC, 2026; NMFS, 2026). It is also important that annual full stock assessment is not a universal requirement across these flatfish stocks. The 2024 RFM report explains that, following stock-assessment prioritization, many Alaska flatfish stocks shifted from a biennial schedule to a quadrennial full-assessment schedule with harvest projections in alternate years, while some stocks retained different review cycles depending on stock characteristics and management needs (MRAG, 2024). The more recent flatfish certification documentation is consistent with that pattern: for example, BSAI and GOA arrowtooth flounder are described as being on a quadrennial stock-assessment schedule, GOA northern and southern rock sole are assessed every four years with off-cycle projections, GOA rex sole is assessed every four years, while BSAI northern rock sole and BSAI Greenland turbot remain on a biennial schedule (MRAG, 2024; MRAG, 2025). Accordingly, the absence of a new 2025 full assessment for some stocks was not, by itself, evidence of non-conformance. What matters for Clause 5 is whether the rollover or interim process remained science-based, stock-specific, and precautionary; the available evidence indicates that it did (SSC, 2026; NMFS, 2026). This interpretation is reinforced by the 2025 catch reports themselves. For both BSAI and GOA flatfish stocks, the catch reports explicitly state that no assessment was conducted in 2025 for the affected stocks because of the lapse in appropriations and resulting shutdown, and that values generated from the previous stock assessment would be rolled over for specifications until data are updated (NMFS, 2025a; NMFS, 2025b). For the GOA, the 2025 catch-report introduction also states that several flatfish stocks or complexes had been scheduled for operational assessments in 2025, but the shutdown prevented completion of those assessments and the Plan Teams did not review them (NMFS, 2025b). This again supports the conclusion that the disruption was to timing, not to the existence of an operational stock-assessment system. For Supporting Clause 5.2 on research capacity, the evidence points to capacity pressure, but not to loss of institutional capability. AFSC's February 2026 D1 briefing states explicitly that priority planning is being undertaken in response to staff losses and resource expectations, with the goal of developing a dynamic, scalable framework to prioritize surveys, stock assessments, and ecosystem science in support of MSA-required management and fishery stability in a variable environment (AFSC, 2026).

	That clearly signals resource stress, but it also shows that the scientific program remains active and is being deliberately structured rather than abandoned. In practice, research capacity also remained operational during the period relevant to this audit: 2025 survey information and catch statistics were still available to the SSC, and for flatfish the SSC explicitly discussed new bottom trawl survey results, catch performance, and risk-table considerations when reviewing final 2026 specifications (SSC, 2026). Taken together, these materials support the conclusion that Clause 5.2 remains met: the program is under pressure, but there is still an established and functioning research system capable of monitoring stock status and supporting management decisions for the flatfish complex SSC, 2026). Overall, the relevant change for Fundamental Clause 5 for the flatfish stocks is therefore best described as a temporary disruption to the 2025 assessment timetable, combined with a broader need to prioritize AFSC science under staffing and funding constraints, rather than any weakening of the underlying stock-assessment system itself. The evidence available in this project supports the conclusion that the institutional framework, scientific standards, assessment processes, publication pathways, and research capacity required under Clause 5 continue to be in place for BSAI and GOA arrowtooth flounder, BSAI Kamchatka flounder, BSAI Alaska plaice, BSAI and GOA flathead sole, BSAI northern rock sole, GOA northern and southern rock sole, BSAI yellowfin sole, GOA rex sole, and BSAI Greenland turbot, although the 2025 shutdown and broader resource constraints should be explicitly noted in the surveillance rationale as matters requiring continued observation (SSC, 2025; SSC, 2026; AFSC, 2026; NMFS, 2026).
Statement whether the fishery continues to conform to CSI's RFM Fishery Standard Fundamental Clause 5	There are no changes in the management of fisheries that would detrimentally affect performance against the confidence ratings for the fundamental clauses and any supporting clauses.

5.2.3. Fundamental Clause 6: Biological reference points and harvest control rule

6. <i>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.</i>	
6.1	<u>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 severe adverse impacts on dependent predators.</u>
6.2	<u>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; Appendix 1, Part 1). 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.</u>
6.3	<u>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 (Appendix 1, Part 1).</u>
6.4	<u>Management actions shall be agreed to in the eventuality that data sources and analyses indicate that these reference points have been exceeded. 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 e on impacts on the fishery resource (Appendix 1, Part 2). Such measures may be temporary and shall be based on best scientific evidence available.</u>
6.5	<u>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</u>

<u>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.</u>	
Summary of relevant changes	For RFM Fundamental Clause 6, the key point for the Alaska flatfish complex, composed by BSAI and GOA arrowtooth flounder (<i>Atheresthes stomias</i>), BSAI Kamchatka flounder (<i>Atheresthes evermanni</i>), BSAI Alaska plaice (<i>Pleuronectes quadrituberculatus</i>), BSAI and GOA flathead sole (<i>Hippoglossoides elassodon</i>), BSAI northern rock sole (<i>Lepidopsetta polyxystra</i>), GOA northern and southern rock sole (<i>Lepidopsetta polyxystra</i> and <i>L. bilineata</i>), BSAI yellowfin sole (<i>Limanda aspera</i>), GOA rex sole (<i>Glyptocephalus zachirus</i>) and BSAI Greenland turbot (<i>Reinhardtius hippoglossoides</i>), is that there was no substantive change in 2025–2026 to the biological reference-point framework or to the harvest control rules themselves. The 2024 RFM Full Assessment Report concluded that Fundamental Clause 6 remained in full conformance, with Supporting Clauses 6.1–6.5 all scoring full conformance, based on the Alaska groundfish tier system, established target and limit reference points, stock assessment procedures, and agreed management responses when thresholds are approached or exceeded (MRAG, 2024). For these flatfish stocks, the management basis therefore remains the same tiered framework described in the assessment: depending on the stock and available information, management relies on Tier 1 and Tier 3 approaches and on stock-specific reference points or proxies such as BMSY, B40%, B35%, F40%, F35%, OFL, ABC, and MSST, with fishing mortality reduced as biomass declines and rebuilding action required if a stock falls below the minimum stock size threshold (MRAG, 2024). The main relevant change in this cycle was procedural rather than structural. The lapse in federal appropriations from 1 October to 12 November 2025 interrupted the normal stock-assessment cycle: federal stock assessment authors did not have time to complete the planned 2025 assessments, the Groundfish Plan Teams did not convene, and the GOA and BSAI Groundfish SAFE Reports were not compiled in the usual way (SSC, 2025). However, this did not invalidate or suspend the Clause 6 framework, because the Council and SSC were still able to rely on the 2024 SAFE assessments and harvest specifications process, together with catch reports, survey information, and other available scientific material, to support the final 2026–2027 harvest specifications (SSC, 2025). In other words, the shutdown affected the timing of updates, but not the existence, logic, or applicability of the reference points and decision rules required under Fundamental Clause 6 (SSC, 2025). This interpretation is reinforced by the broader AFSC and stakeholder evidence. The AFSC priority-planning update in February 2026 emphasized that survey and stock-assessment work continued to be explicitly prioritized to support MSA-required management, and that stock-assessment prioritization should drive data needs and efficient surveys rather than represent a departure from the established harvest framework (AFSC, 2026). Stakeholder input from the site visit likewise indicated that there were no notable changes in routine data collection relevant to stock assessment, that in-season management and observer deployment continued during the shutdown, and that the main effect was a delay in review and observer debriefing rather than a breakdown in fishery-dependent information systems (SSC, 2025). Taken together, the available evidence supports the conclusion that, for Fundamental Clause 6, the reference points, harvest control rules, and remedial management logic for the Alaska flatfish stocks remained unchanged and operational in 2025–2026; the only material change was that the normal 2025 update cycle could not be completed on schedule because of the shutdown (SSC, 2025; AFSC, 2026).
Statement whether the fishery continues to conform to CSI's RFM Fishery Standard Fundamental Clause 6	There are no changes in the management of fisheries that would detrimentally affect performance against the confidence ratings for the fundamental clauses and any supporting clauses.

5.2.4. Fundamental Clause 7: Precautionary approach

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 <u>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.</u> 7.1.1 <u>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 dependant predators, and environmental and socioeconomic conditions.</u> 7.1.2 <u>In the absence of adequate scientific information, appropriate research shall be initiated in a timely fashion.</u>
	7.2 <u>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.</u>
Summary of relevant changes	For Fundamental Clause 7 for the Alaska flatfish complex, the main development since the 2024 RFM Full Assessment Report is not a change in the underlying precautionary framework itself, but a procedural disruption caused by the lapse in federal appropriations from 1 October to 12 November 2025 (NMFS, 2026). The shutdown prevented completion of the groundfish assessments scheduled for update in 2025 and meant that the normal November Groundfish Plan Team review did not occur; the 2025 catch reports for affected stocks accordingly state that no new assessment was completed and that values from the previous assessments were rolled over until data could be updated (NMFS, 2025a, b; NMFS, 2026). However, the available evidence does not indicate any abandonment of the precautionary approach for the in-scope flatfish stocks. Rather, management continued to rely on the previously peer-reviewed assessment basis, existing tier-based harvest control rules, biomass reference points, ABC/OFL/TAC controls, updated catch reports, 2025 survey information, and ecosystem-status material to support the 2026–2027 harvest specifications (NMFS, 2026). This is important for Clause 7 because the 2024 RFM Full Assessment Report for the Alaska flatfish complex had already found that the fishery was in full conformance under Section B, including Fundamental Clause 7, and described a precautionary framework embedded in the Alaska groundfish system through the FMP tier structure, stock reference points, conservative harvest specifications, rebuilding provisions, ecosystem reporting, habitat protections, and bycatch constraints. The subsequent 2025–2026 evidence shows continuity rather than retreat from that framework. NMFS explained that, because updated 2025 assessments could not be completed, there were only limited changes between proposed and final 2026–2027 specifications, which continued to be based on the best available scientific information from the 2024 SAFE reports, survey updates, catch data, ESR material, and Council/SSC review (NMFS, 2026). Stakeholder evidence gathered for the audit is consistent with that interpretation: stakeholders reported no notable change in routine data collection or fishery operations, confirmed that in-season management and observer deployment continued, described the observer-debriefing issue as temporary, and stated that recent survey information had not raised major concerns for the flatfish stocks and that 2025 catches remained within TACs. The broader policy basis also remains precautionary and ecosystem-oriented, with the flatfish RFM report emphasizing a precautionary, adaptive, EBFM-based approach to stock conservation, habitat protection, and bycatch management, and the February 2026 AFSC update describing continued prioritization of survey, stock-assessment, and ecosystem science to support fishery stability in a variable environment (AFSC, 2026). Overall, the evidence supports the conclusion that the shutdown was a significant procedural issue, but not evidence that the fishery management organization ceased to apply the precautionary approach; for the Alaska flatfish stocks, precaution continued to be applied through conservative rollover of prior peer-reviewed advice where necessary, continued use of tier-based reference points and buffers, explicit consideration of uncertainty, and continued ecosystem-based management, habitat protection, and bycatch controls.
Statement whether the	There are no changes in the management of fisheries that would detrimentally affect performance against the confidence ratings for the fundamental clauses and any supporting clauses.

5.3. Section C: Management Measures, Implementation, Monitoring, and Control

5.3.1. Fundamental Clause 8: Management measures

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 Fishing gear shall be marked in accordance with the State's legislation in order that the owner of the gear can be identified. 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-

	<u>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.</u>
	8.8 <u>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.</u>
	8.9 <u>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.</u>
	8.10 <u>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.</u>
	8.11 <u>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.</u>
	8.12 <u>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.</u>
	8.13 <u>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.</u>
Summary of relevant changes	There have been no significant changes since the last reassessment regarding the management measures applied to the fisheries. The fishery continues to be managed under the MSA and the BSAI and GOA Groundfish FMPs, which establish a comprehensive framework of management measures designed to prevent overfishing and achieve optimum yield. Harvest control rules continue to be applied through a tiered management system, including OFL, ABC and TAC, based on the best available scientific information, consistent with the precautionary approach (NPFMC, 2026f, 2026h, 2026i). Annual harvest specifications continue to be developed and implemented by the Council (NPFMC, 2026f). No amendments to the FMPs affecting management measures have been implemented since 2024 (BSAI FMP, 2024; GOA FMP, 2024). In December 2025, the North Pacific Fishery Management Council adopted the 2026–2027 groundfish harvest specifications for the BSAI and GOA groundfish fisheries, based on advice from its Scientific and Statistical Committee (SSC) (NPFMC, 2026c). Due to the government shutdown, some stock assessments scheduled for 2025 were not completed. As a result, the SSC relied on the most recent peer-reviewed 2024 SAFE reports and associated 2026 projections, together with updated information from 2025 catch reports, ecosystem status information, and contextual information from the 2025 BSAI and GOA bottom trawl surveys (NPFMC, 2026k). Technical and spatial management measures, including gear restrictions, closed areas, and habitat protection measures, remain in place and continue to function (BSAI FMP, 2024; GOA FMP, 2024). Measures to reduce bycatch and discards, including prohibited species catch (PSC) limits, gear modifications, and observer-based monitoring, continue to be implemented (NOAA Fisheries, 2026d). Mechanisms to control fishing capacity, including licensing systems and participation restrictions, remain unchanged. Stakeholder participation in the development and review of management measures continues through established Council and BOF processes (BOF, 2026, 2026b; NPFMC, 2026, 2026b, 2026c).

	There have not been any new gear types in the last three years, nor are there artificial reef structures. Therefore, clauses 8.10 and 8.13 are not applicable.
Statement whether the fishery continues to conform to CSI's RFM I Fishery Standard Fundamental Clause 8	Based on the information reviewed during the surveillance audit, there are no changes in the management measures framework that would detrimentally affect the fishery's performance with respect to Fundamental Clause 8. The fishery, therefore, continues to conform to CSI's RFM Fisheries Standard for this clause.

5.3.2. Fundamental Clause 9: Appropriate standards of fishers' competence

9. <i>Fishing operations shall be carried out by fishers with appropriate standards of competence in accordance with international standards, guidelines and regulations.</i>	
9.1	<u>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.</u>
9.2	<u>States, with the assistance of relevant international organizations, shall endeavour 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.</u>
9.3	<u>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.</u>
Summary of relevant changes	Education and training opportunities for individuals seeking to enter or develop careers in commercial fishing and maritime sectors continue to be provided through a range of initiatives and institutions in Alaska. Programs such as the Alaska Maritime Workforce Development Plan, developed collaboratively by representatives of Alaska's fisheries, seafood, and marine industry sectors together with state agencies and the University of Alaska, remain in place to support the development of a skilled maritime workforce in the state². In addition, the NOAA Fisheries Alaska Marine continues to provide funding opportunities for projects that promote and increase sustainability, education, and workforce development in marine-related professions (e.g., Sea Grant Young Fishermen's Development Grant Program, Alaska Aquaculture Funding Opportunities, Bureau of Indian Affairs Endangered Species Program)³. Information relevant to responsible fisheries practices and regulatory requirements remains publicly available on the websites and in the communications of the NPFMC (NPFMC)⁴, and the Alaska Department of Fish and Game (ADFG, 2026d). The BSAI and GOA Groundfish Fishery Management Plans (NPFMC, 2026j) continue to provide summaries of management measures applicable to these fisheries, including regulatory provisions such as quota share systems and individual fishing quotas. Systems for maintaining records of fishers and fishing authorizations also remain in place. The Alaska Commercial Fisheries Entry Commission (CFEC) continues to maintain records of commercial fishing permits and licenses⁵. In addition, the U.S. Coast Guard (USCG) continues to maintain credentialing systems for vessel officers and crew members, including licenses for captains, mates, engineers, and other vessel personnel⁶.

² <https://www.alaska.edu/fsmi/outreach/>

³ <https://www.fisheries.noaa.gov/alaska/funding-financial-services/alaska-region-funding-opportunities>

⁴ <https://www.npfmc.org/>

⁵ <https://www.cfec.state.ak.us/>

⁶ <https://www.dco.uscg.mil/Our-Organization/Deputy-for-Operations-Policy-and-Capabilities-DCO-D/National-Vessel-Documentation-Center/>

Statement whether the fishery continues to conform to CSI's RFM Fishery Standard Fundamental Clause 9	Based on the information reviewed during the surveillance audit, the mechanisms supporting fisher competence remain in place. No changes have been identified that would detrimentally affect the fishery's performance with respect to Fundamental Clause 9, and the fishery continues to conform to CSI's RFM Fisheries Standard for this clause
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5.3.3. Fundamental Clause 10: Effective legal and administrative framework

<i>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.</i>	
10.1	<u>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.</u>
10.2	<u>Fishing vessels shall not be allowed to operate on the stock under consideration in question without specific authorization.</u>
10.3	<u>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.</u>
10.3.1	<u>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.</u>
10.4	<u>Flag States shall ensure that no fishing vessels are entitled to fly their flag, fish on the high seas or in waters under the 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.</u>
10.4.1	<u>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.</u>
Summary of relevant changes	Fisheries in the BSAI and GOA are regulated under 50 CFR 600⁷ and 50 CFR 679⁸, with management measures implemented through the Groundfish Fishery Management Plans (NPFMC, 2026j). Compliance with conservation and management measures is supported through licensing requirements, vessel registration systems, catch reporting obligations, and enforcement activities conducted by the NOAA Office of Law Enforcement (OLE) and the U.S. Coast Guard (USCG). The fishery remains subject to the North Pacific Observer Program, which provides mandatory observer coverage for vessels participating in federally managed groundfish fisheries, including the Atka mackerel and rockfish fishery.

⁷ <https://www.ecfr.gov/current/title-50/chapter-VI/part-600?toc=1>

⁸ <https://www.ecfr.gov/current/title-50/chapter-VI/part-679>

	There have been no reported changes to the monitoring of the fleet. The BSAI catcher processor fleet is required to carry two federal fisheries observers on all vessels. In the GOA, under the Rockfish Program, catcher processors are also required to carry two federal fisheries observers on board (NPOP, 2026). Although this requirement does not apply outside the Rockfish Program in the GOA, the fleet continues to carry two federal observers during those operations. At present, there is no electronic monitoring implemented on the UoA fleet. Monitoring and data collection activities continue to be supported through the industry-funded monitoring program (ADP, 2025 & 2026). Participation in the fishery requires appropriate federal permits and vessel registrations, and monitoring and enforcement activities include vessel inspections, catch reporting verification, surveillance operations, and monitoring of landings. Flatfish fisheries only occur within the USA EEZ. No foreign vessels fish in the USA EEZ, nor do any USA vessels fish in the high seas or in another State's EEZ. Therefore, clauses 10.3, 10.3.1, 10.4, and 10.4.1 are not applicable.
Statement whether the fishery continues to conform to CSI's RFM Fishery Standard Fundamental Clause 10	Based on the information reviewed during the surveillance, no changes have been identified in the monitoring, control, surveillance, or enforcement systems that would detrimentally affect the fishery's performance with respect to Fundamental Clause 10. The fishery, therefore, continues to conform to CSI's RFM Fisheries Standard for this clause.

5.3.4. Fundamental Clause 11: Framework for sanctions

<i>11. There shall be a framework for sanctions for violations and illegal activities of adequate severity to support compliance and discourage violations.</i>	
11.1	<u>State laws of adequate severity shall be in place that provide for effective sanctions.</u>
11.2	<u>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 non-compliance with conservation and management measures.</u>
11.3	<u>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.</u>
11.4	<u>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.</u>
Summary of relevant changes	The fishery continues to operate under a comprehensive legal framework that establishes sanctions for violations of fisheries regulations. U.S. federal law, including provisions under the Magnuson–Stevens Act and implementing regulations (50 CFR 600⁹ and 679¹⁰), provides a range of enforcement measures, including monetary fines, permit suspensions or revocations, forfeiture of catch or vessels, and, where applicable, criminal penalties. According to the NOAA Office of Law Enforcement (OLE) Alaska Division Report to the North Pacific Fishery Management Council (December 2024), enforcement activities continued across Alaska fisheries during the reporting period. From October 1, 2023, to September 30, 2024, NOAA officers and agents opened 1,599 incidents, including 913 under the Magnuson-Stevens Fishery Conservation and Management Act (MSA), 411 under the Northern Pacific Halibut Act, 120 under the Endangered Species Act, and 95

⁹ <https://www.ecfr.gov/current/title-50/chapter-VI/part-600?toc=1>

¹⁰ <https://www.ecfr.gov/current/title-50/chapter-VI/part-679>

	under the Marine Mammal Protection Act, among others. Of the 1,003 incidents closed during this period, 551 were found to have no violation and required no enforcement action, while 267 remained open or under investigation (NOAA OLE, 2024). More recent information from the NOAA OLE Alaska Division Report to the Council (December 2025) indicates that enforcement activity continued. From October 1, 2024, to September 30, 2025, NOAA officers and agents opened 2,256 incidents, including 1,556 related to the Magnuson-Stevens Act, 397 under the Northern Pacific Halibut Act, 104 under the Endangered Species Act, and 105 under the Marine Mammal Protection Act. Of the 1,995 incidents closed during the period, 802 had no violations recorded, while 261 remained under investigation (NOAA OLE, 2025). Both reports also document continued patrol activity and inspections throughout Alaska waters through coordinated patrols, inspections, and outreach with partner agencies such as the U.S. Coast Guard and Alaska Wildlife Troopers. Enforcement activities included multi-day patrols, dockside inspections, and joint enforcement operations with federal and state agencies, resulting in vessel boardings and the detection of federal violations. These activities demonstrate continued enforcement presence and coordination among agencies responsible for fisheries compliance. Joint enforcement efforts between NOAA OLE and the Alaska Wildlife Troopers continued through the Joint Enforcement Agreement, which supports enforcement of federal laws, including the Magnuson-Stevens Act, Marine Mammal Protection Act, Endangered Species Act, and the Northern Pacific Halibut Act. AWT reported actions directly supporting NOAA OLE and marine resource protection. The NOAA OLE 2024 report indicates that Alaska Wildlife Troopers conducted 257 vessel boardings, 930 field contacts, and approximately 1,500 outreach contacts in FY2024, detecting 114 federal violations. In the subsequent NOAA OLE 2025 report, Alaska Wildlife Troopers conducted 291 vessel boardings and 1,114 field contacts, detecting 86 federal violations, further supporting federal fisheries enforcement activities. Overall, OLE reports indicate continued enforcement capacity and monitoring of fisheries operating in Alaska waters through patrols, inspections, incident investigations, and collaboration with partner enforcement agencies. Flatfish fisheries in Alaska occur only within the USA EEZ. No foreign vessels fish in the USA EEZ, nor do any USA vessels fish in the high seas or in another State's EEZ. Therefore, clause 11.4 is not applicable.
Statement whether the fishery continues to conform to CSI's RFM Fishery Standard Fundamental Clause 11	Based on the information reviewed during the surveillance audit, no changes have been identified in the sanctions framework or its implementation that would detrimentally affect the fishery's performance with respect to Fundamental Clause 11, and the fishery continues to conform to CSI's RFM Fisheries Standard for this clause.

5.4. Section D: Serious Impacts of the Fishery on the Ecosystem

5.4.1. Fundamental Clause 12: Impacts of the fishery on the ecosystem

<i>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.</i>	
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** (Appendix 1, Part 3 and 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.
- 12.2.2 The fishery management organization shall consider the most probable adverse impacts of the fishery under assessment on **minor associated species**, by assessing and, where appropriate, addressing and or/correcting them, taking into account available scientific information and local knowledge. Accordingly, these catches (including discards) shall be monitored and shall not threaten these non target stocks 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** (Appendix 1, Part 4 and 7), 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** (Appendix1, Part 5 and 7), 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** (Appendix 1, Part 6), 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, 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	<u>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.</u>
12.3	<u>The role of the stock under consideration in the food web shall be considered, and if it is a key prey species 2 in the ecosystem, management objectives and measures shall be in place to avoid severe adverse impacts on dependent predators.</u>
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.
12.5	<u>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).</u>
12.6	<u>Research shall be promoted on the environmental and social impacts of fishing gear especially the impact of such gear on biodiversity and coastal fishing communities.</u>
12.7	<u>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.</u>
Summary of relevant changes	There were no relevant changes identified in this surveillance audit for Section D, clause 12. Non-target catch as well as prohibited species catch was updated for this fishery and included in Section 4.4. A recent Ecosystem Status report was completed GOA, and that summary is also included for updates on the GOA ecosystem.
Statement whether the fishery continues to conform to CSI's RFM Fishery Standard Fundamental Clause 12	The AK flatfish fishery continue to conform to CSI's RFM Fishery Standard, Section D, clause 12.

6. Update on compliance and progress with non-conformances and agreed action plans

The fishery continues to fully conform to all fundamental clauses and subclauses within CSI's RFM Fishery Standard. There are no new NCs or ongoing action plans to evaluate.

6.1. Closed non-conformances

N/A. No open NCs

6.2. Progress against open non-conformances

N/A. No open non-conformances.

6.3. New non-conformances

N/A. No new non-conformances were identified during the surveillance.

6.4. New or revised corrective action plan

N/A.

6.5. Surveillance activities

7. Appendices

7.1. Evaluation processes and techniques

7.1.1. Site visits

The surveillance audit process was followed in this audit.

Information supplied by the clients and management agencies was reviewed by the assessment team ahead of the meeting, and discussions with the clients and management agencies centred on the content within the provided documentation. In cases where relevant documentation was not provided in advance of the meeting, it was requested by the assessment team and subsequently supplied during, or shortly after, the meeting.

Thirty days prior to the audit site visit, all stakeholders from the full assessment were informed of the visit and the opportunity to provide information to the auditors in advance of, or during, the site visit. The site visit was conducted remotely via Microsoft Teams and held on April 13th. A list of questions was sent to the Client representatives and the relevant managers of the fishery. Given that the required information was publicly available, and that a reassessment was completed in 2025 with no open conditions, the assessment team determined that no additional meetings were necessary.

Below is a detailed description of the assessment plan and process followed during the site visit, including the topics discussed during the meeting:

Assessment Plan

Fishery Name	CSI Atka Mackerel and Rockfish fishery CSI Alaska flatfish fishery MSC Bering Sea and Aleutian Islands Atka Mackerel, Pacific Ocean Perch, and Northern Rockfish and Gulf of Alaska Pacific Ocean Perch, Northern Rockfish, and Dusky Rockfish
Assessment Type	1st Surveillance
Unit(s) of Assessment	Species: Atka Mackerel and rockfish: BSAI Atka mackerel (<i>Pleurogrammus monopterygius</i>); BSAI Pacific Ocean perch (<i>Sebastes alutus</i>); BSAI Northern rockfish (<i>Sebastes polyspinis</i>); GOA Northern rockfish (<i>Sebastes polyspinis</i>); GOA Pacific Ocean perch (<i>Sebastes alutus</i>); GOA Dusky rockfish (<i>Sebastes variabilis</i>) Flatfish: <u>Seven species in the BSAI area</u> Kamchatka flounder (<i>Atheresthes evermanni</i>), arrowtooth flounder (<i>Atheresthes stomias</i>), flathead sole (<i>Hippoglossoides elassodon</i>), Northern rock sole (<i>Lepidopsetta polyxystra</i>), yellowfin sole (<i>Pleuronectes asper</i> , <i>Limanda aspera</i>) and Alaska plaice (<i>Pleuronectes quadrituberculatus</i>), Greenland turbot (<i>Reinhardtius hippoglossoides</i>)

	<u>Five species in the GOA</u> Arrowtooth flounder (<i>Atheresthes stomias</i>), flathead sole (<i>Hippoglossoides elassodon</i>), Northern rock sole (<i>Lepidopsetta polyxystra</i>), Rex sole (<i>Glyptocephalus zachirus</i>), Southern Rock sole (<i>Lepidopsetta bilineata</i>). Harvest: method: Bottom trawl Geographical area: Northeast Pacific, FAO 67 and 61
Assessment Date(s)	13 April 2026
Assessment Location(s)	Remote via Teams
Assessment Language	English
Client	Alaska Seafood Cooperative (AKSC)
Purpose of the Assessment	To conduct a review of continued compliance for the Atka mackerel and rockfish, and the Alaska flatfish fisheries against the Certified Seafood International (CSI) and the Marine Stewardship Council (MSC) Fisheries Standards for Sustainability.
Assessment Team & Roles	Erin Wilson (Team lead, CSI Component D, MSC P2) Antonio Gomez (CSI Component A, C; MSC P3) Giuseppe Scarcella (CSI Component B, MSC P1)
Team Leader Contact Info	Erin.wilson@mragamericas.com

Meeting Date and Time:
April 13, 2026
9:00 AM PDT
Location: Remote, via Teams

Microsoft Teams meeting
Join:
<https://teams.microsoft.com/meet/23429834423586?p=yok1YFjtUSFO5OIIRR>
Meeting ID: 234 298 344 235 86
Passcode: tB2dV28b

Processes To Be Undertaken

Site visit: 13 April 2026

Information Review: April/May

Surveillance Report: 60 days from close of site visit

Date/Time	Activity	Supplemental information/description
April 13, 2026 9:00 – 9:30 AM	Introductions	• Introduction of the team, their roles, and responsibilities regarding scoring the fishery • Introductions of meeting attendees • Screen shot/sign in sheet for attendance
	Overview of the CSI Process	A. The Fisheries Management System B. Science and Stock Assessment Activities, and the Precautionary Approach C. Management Measures, implementation, monitoring and control D. Serious Impacts of the Fishery on the Ecosystem • 13 Fundamental Clauses overall will be the focus of this surveillance audit
	Overview of the MSC process	• Where to find more materials Why Get Certified • Timeline

	Applicable Standards	Document	Version number
		CSI Fisheries Standard	Version 2.2
		Application to Certification Procedures for the Fisheries Standard v2.2	Version 6.3
		CSI Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries	Version 2.2
		MSC Fisheries Certification Process	Version 2.3
		MSC Fisheries Standard	Version 2.01
		MSC General Certification Requirements	Version 2.7
		MSC Reporting Template	Version 2.2
9:30 – 11:30 AM	Discussion With Client Representatives	• Confirm fishery is in scope (review scope declaration form, labour declaration) • Component B/ Principle 1 • Component D/Principle 2 • Component A, C/ Principle 3 Information requested prior to site visit: ○ Changes to the UoA and its management. ○ Any potential changes to scientific information, including stock assessments. ○ Catch data. ○ Updates on research into fishery impacts on habitats or ecosystems. ○ Any potential or actual changes in monitoring, reporting, etc. ○ Performance in relation to any relevant conditions of the certification. ○ Any developments or changes within the UoA that affect traceability and the ability to segregate MSC from non-MSC products. ○ Any changes in personnel relevant to science, management, or industry.	
	Traceability Requirements	Documentation is required to confirm client maintains appropriate records to demonstrate traceability back to the UoC.	
NA	Meetings with Others for this Assessment	No other meetings with managers are necessary for this surveillance as all the information is available online.	
As part of annual harmonization activities	Harmonization Activities	If applicable: • Coordinate with all CABs of overlapping certified/in-assessment fisheries • Review existing scores for overlapping PIs if available • Communicate site visit/audit plans, potential scoring or condition changes Note: additional meetings may be needed if there is a disagreement on scores)	
TBD	Assessment Team Discussion	• Review audit findings and other information collected during audit	

		• Agree on audit conclusions (effectiveness of management, coverage of audit scope, findings and critical issues) • Prepare recommendations and audit conclusions (including conditions)
NA	Closing meeting	Not necessary. One client meeting is sufficient to discuss this fishery. If there are any major changes in the state of the fishery after the review of information, the assessment team will contact the client group for a follow up conversation.

Questions for discussion (previously sent)

1. Have there been any changes in fishing practices, gear, or operational patterns since the last assessment?
2. Have there been any new challenges related to bycatch, discards, or operational constraints?
3. Have there been any changes in observer coverage, reporting requirements, or monitoring systems? Both in the BSAI and GOA
4. Have there been any recent compliance issues or changes in internal company procedures?
5. Any recent data for 2025 in terms of catch composition. We have all the data from 2021 -2024? If so, we need it for Atka mackerel, BSAI & GOA rockfish and flatfish, both target and non-target catch.
6. New information on EFH reviews and/or habitats?
7. Stakeholder concerns or issues
8. New information on the status of the stocks? This will be confirmed by recent stock assessments.
9. New research or trainings for the fleet?
10. Any changes to traceability?
11. Any changes to personnel that could affect the management of the fishery?

Follow up on previous issues

1. Unusual bycatch incidents? (i.e. orcas, sleeper sharks, etc.)
2. New technology to mitigate bycatch?

Questions for the Council/Management

1. Have there been any changes to the legal, institutional, or governance framework for the groundfish fisheries in late 2024?
2. Have there been any FMP amendments, EFH updates, or changes to closed areas affecting these fisheries? If so, please provide details.
3. Have there been any changes to management measures, including harvest control rules, bycatch measures, or gear restrictions?
4. Have there been any changes to monitoring programs (observer coverage, electronic monitoring)?
5. Have there been any notable compliance or enforcement trends in recent years?
6. Have there been any changes to training, licensing, or registration requirements for fishers?
7. Have there been any budget or resource changes since the last assessment, and if so, could you please describe how these have affected management, research, or enforcement activities related to the groundfish fisheries?

NOAA OLE, Enforcement

1. Have there been any changes to enforcement frameworks or responsibilities since the last assessments?
2. Have there been any changes to monitoring systems (e.g., observer program, inspections, VMS)?
3. Have there been any notable trends in violations or compliance in these fisheries?
4. Have there been any significant enforcement cases or recurring issues relevant to these fisheries?
5. Have there been any budget or resource changes since the last assessment, and if so, could you please describe how these have affected enforcement activities?

7.1.2. Stakeholder participation

Thirty days prior to the audit site visit, all stakeholders from the full assessment were informed of the visit and the opportunity to provide information to the auditors in advance of, or during, the site visit. We received no requests from outside stakeholders to take part in meetings, nor did we receive any written submissions regarding the fisheries. Additional meetings were not necessary as the schedules for stock assessments, changes in regulation and compliance summaries are publicly available online. However, follow-up conversations via email were initiated where necessary.

The following participants were in attendance either remotely, or in contact by email where they provided information that supports the results of this audit:

Table 10. Stakeholders' attendance for the Alaska Flatfish Fisheries 1st surveillance.

Name	Organization
Beth Concepcion	Alaska Seafood Cooperative
Chris Woodley	Alaska Seafood Cooperative
Sarah Webster	Alaska Seafood Cooperative
Mary Beth Nickell-Tooley	O'Hara Corporation
Jennifer Kane	ANAB
Erin Wilson	MRAG Americas
Giuseppe Scarcella	MRAG Americas
Antonio Gomez	MRAG Americas

7.2. Stakeholder input

Prior to the audit site visit, all stakeholders were informed of the visit and given the opportunity to provide information to the auditors in advance of, or during, the site visit.

No stakeholder input was received for the fisheries 1st surveillance audit.

8. References

References in Sections A and C

- ADEC, 2026. Alaska Department of Environmental Conservation (March 25th, 2026). <https://dec.alaska.gov/>
- ADEC, 2026b. Alaska Department of Environmental Conservation, Division of Spill Prevention and Response, Prevention Preparedness and Response (March 25th, 2026). <https://dec.alaska.gov/spar/ppr/spill-information/response/>
- ADFG, 2026. Alaska Department of Fish and Game. Budgets & Performance (March 19th, 2026). <https://www.adfg.alaska.gov/index.cfm?adfg=about.budgets>
- ADFG, 2026b. Alaska Department of Fish and Game. Management and Research (March 23rd, 2026). <https://www.adfg.alaska.gov/index.cfm?adfg=research.main>
- ADFG, 2026c. Alaska Department of Fish and Game. Wildlife Management & Research (March 23rd, 2026). <https://www.adfg.alaska.gov/index.cfm?adfg=wildliferesearch.main>
- ADFG, 2026d. Alaska Department of Fish and Game. Fishing Regulations (March 30th, 2026). <https://www.adfg.alaska.gov/index.cfm?adfg=fishregulations.main>
- ADP, 2026. Annual Deployment Plan for observers and Electronic Monitoring in the Groundfish and Halibut Fisheries off Alaska, January 2026. NOAA Fisheries. https://www.fisheries.noaa.gov/s3/2026-01/Final_2026_ADP_akro.pdf
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- BOF, 2026. Alaska Board of Fisheries. Alaska Department of Fish and Game (March 19th, 2026). <https://www.adfg.alaska.gov/index.cfm?adfg=fisheriesboard.main>
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