

# Pacific Seabird Group



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DEDICATED TO THE STUDY AND CONSERVATION OF PACIFIC SEABIRDS AND THEIR ENVIRONMENT

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**September 29, 1999**

Mr. David Kerstetter  
NOAA-Fisheries/SF  
1315 East-West Highway  
Silver Spring, MD 20910

**Re: U.S. National Plan of Action on Seabird By-Catch**

Dear Mr. Kerstetter:

These are the comments of the Pacific Seabird Group (PSG) concerning the U.S. National Plan of Action for the Reduction of Incidental Catch of Seabirds in Longline Fisheries. The notice in Fed. Reg. 48,987-88 (September 9, 1999) provides a schedule and outline for a U.S. National Plan of Action pursuant to the International Plan of Action for the Reduction of Incidental Catch of Seabirds in Longline Fisheries, approved by the United Nations Food and Agriculture Organization (FAO)'s Committee on Fisheries. PSG is an international organization that was founded in 1972 to promote knowledge, study and conservation of Pacific seabirds. PSG draws its members from the entire Pacific Basin, including Mexico, Canada, Japan, China, Australia, New Zealand, French Polynesia and Russia. Among PSG's members are biologists who have research interests in Pacific seabirds, state and federal officials who manage seabirds and the marine environment, and individuals with interests in marine conservation.

We agree with the comments of the American Bird Conservancy, and urge this nation to lead by example by implementing a strong, comprehensive National Plan of Action that serves as a global model and greatly reduces or eliminates the killing of seabirds in longline fisheries. Unless the U.S. adopts and implements such a plan, we doubt that many fishing nations will voluntarily implement strong national plans to stop the slaughter of hundreds of thousands of seabirds annually on longline hooks. We urge that this document do more than simply summarize the efforts underway in our fisheries. We need a bold, comprehensive

National Plan of Action with an implementation schedule that assures the protection of seabirds in our own waters and by our fishermen wherever they may fish.

We commend you for your goal of completing the National Plan of Action by January 2000. This would send strong signals to the other longline fishing nations that the U.S. is serious about its commitments. Most importantly, we would hope that the National Plan's elements that are not yet in place would be implemented immediately upon adoption. This would ensure that the U.S. would be able to report at the FAO's Committee on Fisheries session in 2001 that seabird avoidance has been achieved in its fisheries and its National Plan of Action has been fully implemented.

As detailed in the comments of the American Bird Conservancy, we urge that the National Plan of Action include the following elements:

1. Require avoidance measures for all U.S. flag longline vessels, including fisheries in Hawaii for tunas and swordfish and fisheries in Alaska for halibut;
2. Commitment to providing sufficient observers to assess seabird mortality and monitor compliance in all U.S. longline fisheries;
3. Commitment to funding research to develop better avoidance measures;
4. Commitment to education, training and publicity;
5. Commitment to exercising international leadership and co-operation; and
6. Provisions for a comprehensive annual report that estimates seabirds killed by U.S. fisheries, to be issued in January 2001 for calendar year 2000.

PSG believes that the FAO International Plan of Action-Seabirds is a step to gaining the cooperation of each longlining nation to end the decimation of seabird populations. We want this nation to lead by example on this issue, and urge the adoption of a strong National Plan of Action for eliminating seabird killing by all U.S. vessels and in all U.S. waters.

Sincerely,



Craig S. Harrison