Committee on Resources,

Subcommittee on Fisheries Conservation, Wildlife & Oceans

fisheries - - Rep. Wayne Gilchrest, Chairman
U.S. House of Representatives, Washington, D.C. 20515-6232 - - (202) 226-0200

Witness Statement

CONGRESSIONAL TESTIMONY OF
JUSTIN LEBLANC
VICE PRESIDENT, GOVERNMENT RELATIONS
NATIONAL FISHERIES INSTITUTE
on the
MAGNUSON-STEVENS FISHERY CONSERVATION AND MANAGEMENT ACT (MSFCMA)
U.S. HOUSE OF REPRESENTATIVES
COMMITTEE ON RESOURCES
OCEANS, FISHERIES, AND WILDLIFE CONSERVATION SUBCOMMITTEE
APRIL 4, 2001
2:00PM

Chairman Gilchrest, Congressman Underwood, and distinguished members of the subcommittee, on behalf of the more than 800 members of the National Fisheries Institute (NFI), I want to thank you for the opportunity to testify before you on the reauthorization of the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA). I am Justin LeBlanc, the Vice President of Government Relations at the NFI.

The NFI is the nation's leading trade association for the diverse commercial fish and seafood industry. We are an "ocean to table" organization, representing harvesters, processors, importers, exporters, distributors, restaurants, and retail establishments. NFI's mission is to ensure an ample, safe, and sustainable seafood supply to consumers. The NFI is therefore committed to the long-term sustainable use of our nation's fishery resources. As I have stated before to this subcommittee, some of our member companies have been providing seafood to U.S. consumers for more than 100 years and would like to continue to do so for at least another 100 years.

The 1996 Sustainable Fisheries Act (SFA), as we all know, marked a tremendous redirection of our nations fishery policies. Considerable new burdens were placed on the Regional Fishery Management Councils and the National Marine Fisheries Service (NFMS) to end overfishing, rebuild overfished fisheries, protect Essential Fish Habitat, and assess impacts on fishing communities, among other things. Many sectors of the commercial fishing industry, including the NFI, supported many of the provisions enacted in the SFA. However, the implementation of these provisions by the National Marine Fisheries Service (NMFS) has revealed very serious problems with the Act that need to be addressed. While well-intentioned, many of these new provisions have had unexpected impacts and consequences and have revealed strategic weaknesses in our fisheries conservation and management system. My testimony will focus on 7 key issues:

1. Best Scientific Information Available

2. Essential Fish Habitat

3. Overfishing/Rebuilding

4. Observers

5. Cumulative Impacts of Regulatory Decisions

6. Precautionary Approach

7. Ecosystem Management

1. Best Scientific Information Available

National Standard #2 of the MSFCMA requires all Fishery Management Plans (FMPs) to be based on the best scientific information available. In all too many cases, there has been far greater emphasis on what information is available and far too little interest in generating the best information. For example (and there are many), the New England Fishery Management Council and the NMFS are currently developing a Fishery Management Plan for deep-sea red crab. As a basis for the FMP, they are using data generated by a 1974 otter trawl survey of two week duration and choosing to ignore more recent research conducted by Canada, the Virginia Institute of Marine Sciences, and the University of Maryland because such information is not "official NMFS data". It is clearly in the best interest of all parties that the most contemporary reliable data be used for stock assessment and FMP development, whether such data is generated "in-house" or by outside sources.

In recent years, there have been numerous examples of NMFS data being disproven by outside expertise. The surf clam/ocean quahog fishery of the Mid-Atlantic region was essentially saved by outside expertise that demonstrated serious undersampling of the resource by NMFS surveys. Outside research on New England scallops also demonstrated inadequate science by the agency. Although the NMFS likes to tout New England scallops as a management success story, the industry had to fight tooth and nail to get the outside research recognized as legitimate by the agency and incorporated into the FMP process. Independent, outside review of the NMFS data on the South Atlantic Reef Fish FMP also demonstrated serious deficiencies in the information being used by the agency.

The NFI believes there are three things that could markedly improve the Best Scientific Information Available: independent peer review of NMFS stock assessment data, cooperative research programs, and equitable treatment of "anecdotal information" from both commercial and recreational sectors.

Every regional fishery management council has a committee that "independently" reviews NMFS stock assessment data. Far too often, these review committees are anything but independent. Often filled with other NMFS employees and recipients of NMFS funding, these committees have inherent conflicts-of-interest that create either conscious or unconscious tendencies to support the NMFS data. With the tendency of truly independent analyses to differ from NMFS-generated data and the unwillingness (now lessening) of the agency to consider outside information, truly independent peer reviews of the scientific data upon which FMPs are based could dramatically improve NMFS stock assessment work and the confidence of user groups in that work.

Other major criticisms of NMFS scientific work are that it is insufficient in quantity and quality and that it lacks stakeholder confidence. Cooperative research programs could go a long-way to solving some of these problems, at least in part. Cooperative research efforts allow the NMFS to leverage limited federal dollars

while at the same time building relationships with the commercial sector from which both scientists and fishermen can learn. For example, the Mid-Atlantic commercial fleet, through Rutgers University is currently engaged in side-by-side trawl surveys with a commercial fishing vessel (F/V Janice and Danielle) fishing alongside the NMFS FR/V Albatross at the Albatross' historic sampling sites. Although the data is yet to be analyzed, reports from the vessels indicate a difference in catch of such enormous magnitude that the statistical reliability of NMFS' surveys may be suspect. For example, the commercial vessel has landed as much scup in one tow at one NMFS station as the Albatross landed for its entire survey last year.

On the West Coast, the Pacific groundfish fishery is suffering under a tremendous harvest reduction to rebuild fisheries classified as overfished. With NMFS surveys of these stocks occurring only once every three years, this 30-years old fishery is being managed with essentially ten data points. Cooperative research could help fill these massive data gaps. The General Accounting Office (GAO)[1] in its report last April recommended that the NMFS "increase the involvement of the fishing industry, its expertise, and its vessels in fishery research activities…"

In addition, the NMFS must incorporate anecdotal information provided by fishermen into its stock assessment process, if only to question and/or ground truth the legitimacy of its own scientific information as the side-by-side trawl work I just mentioned suggests. This proposal is constantly scoffed at by NMFS employees and members of the conservation community. No one is proposing that fishermen shouting at a council meeting "There are plenty of fish out there!" should turn over a NMFS official stock assessment. However, as the GAO[1] reports, NMFS does require commercial fishermen to collect and report about the type, weight, and length of species harvested. Because much of this information cannot be independently verified, NMFS is reluctant to use it. NMFS does, however, use similar self-reported data for recreational fishermen. NMFS obtains information about recreational catches, in part, by calling a random sample of recreational fishermen and asking them what they caught. These unverified responses are then combined with catch data obtained from a sample of recreational fishermen as they land to estimate the total recreational catch. While anecdotal information cannot replace true scientific analyses, it can inform the process in important ways and should be taken into consideration in some manner.

2. Essential Fish Habitat

The implementation of the Essential Fish Habitat (EFH) provisions by the NMFS has been flawed as revealed in the hearing this subcommittee held on EFH last year. The scope of EFH has been defined far too broadly, resulting in essentially the entire Exclusive Economic Zone (EEZ) being defined as EFH. If everything is essential then nothing is. If you attempt to protect everything, you will likely end up protecting nothing at all. The NFI believes this conception of EFH is inconsistent with congressional intent. The concept of EFH should be used to afford the conservation of discrete or particular, definable units of habitat. The NMFS concept of Habitat Areas of Particular Concern (HAPCs) is much more on target and the authority to regulate the impacts of fishing activities should be focused on these areas, not the entire EEZ.

3. Overfishing and Rebuilding Programs

Currently, any stock of fish that is of low abundance relative to some historic high is classified as an overfished stock, whether this low abundance is the result of fishing activity or changes in the marine environment unrelated to fishing. Since these fisheries are classified as overfished, the Councils are required to implement rebuilding plans to once again attain the historic high level of abundance within ten years, whether or not the current state of the marine environment can sustain such an abundance level (considered

the carrying capacity of the environment for a stock of fish). The apparent driving force behind this is a misconception of the Maximum Sustainable Yield (MSY) of a fishery as a static concept that does not change.

But MSY is dependent on the carrying capacity of the marine environment. Changes in the marine environment alter the carrying capacity of the environment, which, in turn changes the potential MSY for the fishery. The National Academy of Sciences (NAS), in its 1999 report: Sustaining Marine Fisheries[2] states that "Environmental changes can produce effects similar to those of fishing, and it is often difficult to distinguish them from the effects of fishing. Although they cannot be controlled directly, environmental fluctuations exert a fundamental influence on the behavior of marine ecosystems and must be taken into account by managers. To be sustainable, fishing and fishery management must be flexible and responsive to environmental changes as well as conservative of ecosystem components."

In the second edition of "Understanding Fisheries Management"[3], a manual published by the Auburn University Sea Grant Marine Extension and Research Center and the Mississippi-Alabama Sea Grant Legal Program, the authors state:

"Another aspects of carrying capacity is that it changes as environmental conditions changes from year to year. The most obvious example of this is found in the brown shrimp fishery of the Gulf of Mexico. From 1980 to 1998 landings were as high as 193 million pounds (1986) and as low as 125 million pounds (in 1983). Much of this variation can be attributed to salinity conditions in the marsh habitat used by very small shrimp. When conditions were good (high salinity), there was more suitable habitat and more young shrimp survived. When conditions were poor (low salinity), there was less suitable habitat and fewer young shrimp survived."

While it is obvious that harvest regimes need to take this variability into account, more importantly, our concepts of overfishing need to be altered to recognize this variability. Otherwise, in low salinity years, the Gulf of Mexico brown shrimp fishery would be classified as overfished and a rebuilding plan to attain the abundance of a high salinity year would be imposed, unnecessarily restricting fishing activity and not producing the desired result, particularly if there are a number of low salinity years in a row.

In another example, the Mid-Atlantic scup fishery is classified as overfished and subject to a rebuilding plan. The NMFS has relative abundance data for scup going back 30 years. The long-term average relative abundance of scup since 1969 is 0.78 kg/tow Spring Spawning Stock Biomass (rolling 3-year average). However, for three years (1977 -- 1979) immediately following the passage of the FCMA , scup relative abundance shot up to an average 2.26 kg/tow Spring Spawning Stock Biomass. The NMFS has selected as its rebuilding target (MSY) for scup this average of the three highest years on record, even though it is three times higher than the long-term average. It is unlikely that scup will ever reach these abundance levels again, even with a cessation of all fishing activity.

On the West Coast, Pacific Ocean Perch (POP) is commonly found in Alaska, Canada, and northern Washington. The Washington stock was heavily fished by foreign vessels prior to enactment of the MSFCMA. When the U.S. assumed management in 1977, the Pacific Fishery Management Council established a rebuilding program to restore the stock. Surprisingly, stocks leveled off but did not increase in spite of stringent harvest controls. At the same time, POP stocks in Alaska were rapidly rebuilding. It now appears that the Washington stock was an outlying population that moved into the area in response to some unknown shift in the marine environment that shifted back as evidenced by the return of POP to Alaska.

Such a shift changed the carrying capacity for POP in the waters off the coast of Washington. In addition, as POP stocks declined, other species replaced the ecosystem "space" made available, yet another change to the carrying capacity of Washington waters. Finally, original stock assessments more than likely over-estimated the virgin biomass as the reporting of foreign catches was haphazard and unreliable: since POP was a prime commodity, especially in Russia, all rockfish were reported as POP. Despite all these factors, under the MSFCMA we are required to rebuild POP to an abundance level that probably never existed and, even if it did, is not likely possible today.

It is therefore imperative that our definitions of MSY, overfishing, and rebuilding recognize environmental variability and take it into consideration when determining whether fisheries are overfished and what appropriate rebuilding targets should be.

Another example of the 1996 SFA gone awry is Georges Bank haddock (G.B. haddock). In 1993, the New England Fishery Management Council submitted a rebuilding plan for G.B. haddock as part of Amendment 5 to the Multispecies FMP. Under the rebuilding plan approved by the Secretary, the status of G.B. haddock has markedly improved. Spawning stock biomass has increased from 10,900 metric tons (mt) to 38,100 mt in 1998. The 1998 and 1999 year classes of haddock are estimated to be 48.5 million and 35.2 million fish, respectively. The 1998 year class is the largest year-class since 1978 and the third largest year class since 1964, the 1999 year-class is the fourth largest since 1964.

Spawning stock biomass for 1999 is estimated to be 48,522 mt or 46% of the MSY yield target of 105,000 mt. Spawning stock biomass is projected to increase to 86,145 mt by 2001 (probability 75%) under present restrictions and the present fishing mortality rate. The stock is projected to rebuild to MSY spawning stock biomass (105, 000 mt) under present restrictions by 2002. The present fishing mortality rate is well below the maximum allowed and is well below the rate at which the Canadians are fishing the stock.

Nonetheless, under the present requirements of the MSFCMA and the National Standard Guidelines, the Council must establish a new rebuilding program for G.B. Haddock. That rebuilding program must be accomplished in the shortest possible time, not to exceed ten years. The Council's groundfish plan development team has suggested a rebuilding time of 2004 with a fishing mortality rate 38% lower than the current rate, which is already 39% lower than the maximum allowed! This requirement will further restrict fishing for G.B. haddock at precisely the time the stock will have reached MSY under the existing restrictions!

The system is clearly broken.

4. Observers

There has been a call by some for universal observer coverage in all U.S. fisheries. Observers can and do play a critical role in enhancing the scientific data for FMPs. Universal observer coverage, however, is not necessary, may be cost-prohibitive, and poses potential safety threats. Used in combination with self-reported information, representative observer coverage can provide statistically reliable information. In addition, many fisheries and the vessels engaged in them are ill-suited for observers whose presence could create safety concerns for both observers and the crew, particularly on small vessels.

Also of importance is the need to clarify the goals and objectives of observer programs before they are implemented. Are the observers on-board to monitor bycatch, discards, species composition, total landings, or some combination of these parameters? How will the fishery, the Council, and the NMFS confirm that

the data being collected by observers is effective at addressing the goals and objectives and that the information is being incorporated into the management process? The NFI believes that all observer programs should have clearly articulated goals and objectives developed before their implementation and that these programs should be periodically assessed to ensure they are fulfilling the goals and objectives. Such an approach will only improve observer programs in the long-term.

In addition, the costs of observer programs should be borne by all the beneficiaries of the program, including all participants in the observed fishery as well as other affected fisheries, where appropriate.

5. Cumulative Impacts of Regulatory Decisions

National Standard #8 requires the NMFS to minimize the adverse economic impacts of fishery conservation and management measures on fishing communities. All too often, however, the NMFS assesses a regulatory decision in isolation from previous decisions in the same fishery, thereby determining that the regulatory decision has no significant economic impact and is, therefore, consistent with not only with National Standard #8, but also the requirements of the National Environmental Policy Act, the Regulatory Flexibility Act and Executive Order 12866. In many of these cases, the most-recent regulatory decision could well be the straw that breaks the camel's back. The GAO[1] recommended that the consideration of secondary and cumulative impacts by the NMFS be expanded.

For example, as has already been mentioned, the database used to manage west coast groundfish is poor. As a result - and especially with Pacific rockfish species - the Pacific Fishery Management Council has taken a number of management actions, each of which independently are arguably scientifically correct, but which cumulatively have led to a disaster declaration for the industry. These include "precautionary" reductions on Pacific rockfish harvest due to lack of data; imposition (with no phase-in period) of new harvest rate policies that further reduce harvest levels; and multi-species harvest restrictions in order to protect single species. Even worse, the Council has collected virtually no social and economic data on the fleet, processors, or local communities, so the Council can't even begin to measure cumulative impacts; but the number of "For Sale" signs on the dock tells you that the impacts exist.

The NFI believes, therefore, that National Standard #8 should be amended to require the agency, when considering the impact of regulatory decisions on fishing communities and seeking to minimize negative economic impacts, to consider the cumulative economic and social impacts in order to more accurately reflect the toll such decisions can take on fishing communities. Such analyses would not only assess the impacts of additional incremental regulations on a particular fishery but also how those regulatory decisions may impact other fisheries by, for example, shifting effort to those other fisheries.

6. Precautionary Approach

The MSFCMA does not call for the application of the precautionary approach. However, the United States is party to several international agreements, most notably the United Nations Code of Conduct for Responsible Fisheries, that call for the application of the precautionary approach. The precautionary approach has been touted as an approach to fisheries management to will save us from making mistakes that could devastate a fishery. Simply put, the precautionary approach proposes that the less you know, the more conservative your approach. It sounds so good, so common-sensical, how can anyone oppose it. However, this simple description of the precautionary approach fails to recognize the inherent uncertainty present in fisheries science.

I would like to refer to someone with far more expertise on this matter than myself. Dr. Doug Butterworth of the University of Cape Town, South Africa presented a paper at the United Nations last year on the precautionary approach[4]. Dr. Butterworth is an internationally-recognized fisheries expert and provides scientific guidance on the precautionary approach to both the United Nations and the Convention on International Trade in Endangered Species (CITES). Dr. Butterworth states:

"Fisheries assessment is an inexact science, in which uncertainty is pervasive. At a certain level, uncertainty, or, lack of predictability, is endemic, and fisheries management has to learn to live with that. Three decades ago, fisheries management dealt with this problem simply. Coarsely put, it said: use the scientist's agreed best assessment, then take off 10% for safety. But then scientists started trying to get more clever. We argued essentially that the safety level should be greater, the less certain we are…

"Now as a counter to arguments typically offered by short-term-orientated industrial interests in the past - 'catches can't be reduced unless there's absolute certainty that this is necessary' - the existing statement of the Precautionary Principle *(where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation, inserted)* is fine, albeit lacking in specifics… But the Principle as stated offers no operational definition and the choice of language is poor. In science we can only disprove, not prove, so that there is never 'full scientific certainty'. These deficiencies has allowed free reign in interpreting the Principle.

"My chief argument is with those who cite the Precautionary Principle as the justification to defend a 'worst-case scenario' based management approach… But if we are honest with ourselves, that is simply not a practical approach to life. If anyone disagrees with me, I'll be interested in their explanation of how they got here, given that, precautionarily, they should have declined to take an aircraft flight to Rome because they were unable to rule out absolutely the possibility that the aircraft would crash."

Dr. Butterworth's point is that the precautionary approach cannot be effectively applied in the context of fisheries management unless combined with an assessment of the probabilities of certain outcomes and a determination of acceptable levels of risk that these outcomes will occur.

The determination of acceptable risk levels is a social and political decision. It is not a scientific one. Scientists should tell fishery managers that a certain fishing mortality rate has a certain probability of overfishing the resource. Fishery managers should then combine this information with an estimate of the social and economic impacts of their decisions and choose an acceptable balance.

Of course, worst-case scenario management would have you seek a fishing mortality rate that has no chance of overfishing the resource. Such an approach is not only impractical, it is impossible. But even in the absence of worst-case scenario management, the Precautionary approach would have you always select a lower fishing mortality rate regardless of the cost to society. But is that appropriate? Or is there some point at which we, as a society, are willing to accept a slightly higher risk of negative outcomes to minimize negative social and economic impacts? And where does the trade-off occur? At what point is this risk of overfishing too high? 5%, 10%, 50%? At what point are the social and economic costs too great? The challenge is that there is no right answer to these questions. Science cannot tell us what to do. We must make a social decision about the balance we seek in fisheries conservation and management.

The NFI believes that to apply the Precautionary Approach in the absence of such risk analysis assumes that a zero chance of overfishing regardless of the social and economic impact is the right social choice. We cannot support such an approach. Now, of course an FMP should be less likely to result in overfishing than

more likely, but just how unlikely is appropriate will vary from fishery to fishery dependent upon the social and economic costs.

We must remember that fishermen, just like farmers, provide Americans with an important resource: food. A food, in fact, which medical experts recommend Americans consume more of as part of a healthy and balanced diet. These fishermen create jobs and economic prosperity, stabilizing and enhancing the communities in which they live. Are we as a society willing to sacrifice fishing communities and the people whose livelihoods depend upon fishing in order to achieve zero-risk (biologically) fishery conservation and management regimes? Or should we be willing to accept certain levels of risk to ensure that fishing communities and fishermen are around to reap the benefits of rebuilt fisheries for American and world consumers in the future? Under worst-case scenario management, Americans could continue to flock to their ocean-front condominiums that have replaced commercial fishing piers, look out on an ocean full of fish, and have no seafood on the dinner plate.

7. Ecosystem Management or Multi-species management

In the 1999 Report to Congress by the Ecosystem Principles Advisory Panel titled Ecosystem-Based Fishery Management[5], the Panel calls on the NMFS to develop Fisheries Ecosystem Plans (FEPs) for every Fishery Management Plan. The Panel calls for these FEPS to contain the following:

> a. Delineate the geographic extent of the ecosystem(s) that occur(s) within Council authority, including characterization of the biological, chemical, and physical dynamics of those ecosystems, and "zone" the area for alternative uses.
>
> b. Develop a conceptual model of the food web.
>
> c. Describe the habitat needs of different life history stages for all plants and animals that represent the "significant food web" and how they are considered in conservation and management measures.
>
> d. Calculate total removals - including incidental mortality - and show how they relate to standing biomass, production, optimum yields, natural mortality, and trophic structure.
>
> e. Assess how uncertainty is characterized and what kind of buffers against uncertainty are included in conservation and management actions.
>
> f. Develop indices of ecosystem health as targets for management.
>
> g. Describe available long-term monitoring data and how they are used.
>
> h. Assess the ecological, human, and institutional elements of the ecosystem that most significantly affect fisheries and are outside the Council/Department of Commerce authority. Included should be a strategy to address those influences in order to achieve both FMP and FEP objectives.

While many fishermen have been urging the NMFS to take into consideration the impacts of coastal development, pollution, and other environmental changes on fisheries productivity and to adopt multi-species management systems that take into consideration competitive interactions and predator-prey relationships, the sheer information needs of a comprehensive ecosystem management approach as outlined by the Panel are overwhelming.

Before ecosystem management could be implemented in any real sense, massive data insufficiencies would need to be filled. The Regional Fishery Management Councils and the NMFS are already overwhelmed with obligations under the MSFCMA and, as the growing number of lawsuits filed against the agency reveal, are already severely limited in their ability to meet these obligations. Comprehensive ecosystem-based fisheries conservation and management would require a NMFS budget many times larger than is currently the case. The NFI is not convinced that there is a political willingness to fund the agency sufficiently to meet the scientific requirements of ecosystem-based management.

To require such an approach would, therefore, result in essentially an unfunded mandate to the agency and, by proxy, to the user groups. We simply do not have a thorough enough scientific understanding of marine ecosystems to know all the variables that must be incorporated into ecosystem-based management. The NFI believes we must considerably expand our knowledge base before we can implement ecosystem-based fisheries conservation and management in a manner that avoids unintended consequences for both fishermen and marine ecosystems.

Mr. Chairman, members of the Subcommittee, the reauthorization of the MSFCMA presents a tremendous opportunity to further evolve our fisheries conservation and management policies. The 1996 SFA was an important step in that evolution from which we have learned many lessons. I look forward to working with all of you during the reauthorization process to ensure a law that provides for sustainable fisheries while allowing U.S. consumers to enjoy safe, wholesome seafood. I thank you for the opportunity to testify before you.

References:

1. General Accounting Office. April 2000. Fishery Management: Problems Remain With National Marine Fisheries Service's Implementation of the Magnuson-Stevens Act. GAO/RCED-00-69.

2. National Academy Press. 1999 Washington, D.C. Sustaining Marine Fisheries. Committee on Ecosystem Management for Sustainable Marine Fisheries. Ocean Studies Board. Commission on Geosciences, Environment, and Resources. National Research Council.

3. Wallace, Richard K. and Kristen Fletcher. 2001. Understanding Fisheries Management: A Manual for understanding the Federal Fisheries Management Process, Including Analysis of the 1996 Sustainable Fisheries Act. 2nd Ed. Auburn University Sea Grant Marine Extension and Research Center & Mississippi-Alabama Sea Grant Legal Program MASGP-00-005.

4. Butterworth, Doug S. 2000. Science and Fisheries in the New Millennium, presented at University of Virginia School of Law, Center for Oceans Law and Policy Conference: Current Fisheries Issues and the Food and Agriculture Organization of the United Nations. March 15-17, 2000. Food and Agriculture Organization Headquarters, Rome, Italy. MARAM, Dept. of Mathematics and Applied Mathematics, University of Cape Town, Rondebosch 7701, South Africa.

5. Ecosystem-Based Fishery Management. April 1999. A Report to Congress by the Ecosystem Principles Advisory Panel as mandated by the Sustainable Fisheries Act amendments to the Magnuson-Stevens Fishery Conservation and Management Act.

# # #