

SUR

62

SENATE FINANCE COMMITTEE REPORT

DATE: 3/6/90

FURTHER:

DATE TURNED INTO OFFICE: 3/13/90

The Finance Committee considered

SSSJR 62

Relating to the bycatch of herring in the Bering Sea groundfish trawl fisheries.

and recommended:

- replace with _____ CS SSSJR 62 (Fin)
 or adopt _____ CS _____
 attached amendment(s)
 _____ letter of intent adopted

- same title
 new title
 technical title change (HB only)

do pass

do not pass

no recommendation

individual recommendations

further referral to _____

ATTACHES NEW FISCAL NOTE(S):

fiscal note(s) _____ Dept/Date: _____

zero fiscal note(s) _____
DF+G 2-15/90

appropriation-no fiscal note

APPROVES PREVIOUS:

fiscal note(s) _____ Dept/Date: _____

zero fiscal note(s) _____

SIGNING DO PASS:

OTHER RECOMMENDATIONS:

1. John P. ... DO PASS

2. F. ... DO PASS

Co-Chairs: Signatures and Recommendations

STATE OF ALASKA
1990 LEGISLATIVE SESSION

BILL VERSION: SS SJR 62
PUBLISH DATE: 3/6/90

FISCAL NOTE

REQUEST:

Revision Date: _____
Title: Relating to the location of
herring in the Bering Sea
Sponsor: pinkiev
Requestor: governor

Agency Affected: Fish and Game
BRU: Commercial Fisheries
Components: all

EXPENDITURES/REVENUES: (Thousands of Dollars)

OPERATING	FY 91	FY 92	FY 93	FY 94	FY 95	FY 96
PERSONAL SERVICES	0					
TRAVEL	0					
CONTRACTUAL	0					
SUPPLIES	0					
EQUIPMENT	0					
LAND & STRUCTURES	0					
GRANTS, CLAIMS	0					
MISCELLANEOUS	0					
TOTAL OPERATING	0	0	0	0	0	0

CAPITAL	0	0	0	0	0	0
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REVENUE	0	0	0	0	0	0
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FUNDING: (Thousands of Dollars)

GENERAL FUND						
FEDERAL FUNDS						
OTHER						
TOTAL						

POSITIONS:

FULL-TIME						
PART-TIME						
TEMPORARY						

ANALYSIS : (Attach a separate page if necessary)

No FY 90 impact

Prepared by: Robert C. Clashy Phone: 465-2710
Division: Commercial Fisheries Date: 2/13/90

Approved by Commissioner: [Signature] Date: 2/13/90
Agency: _____

Distribution (by preparer):
Legislative Finance
Legislative Sponsor
Requestor
Office of Management and Budget
Impacted Agency(ies)

Changes in SS SJR 62 (Fin)
have no fiscal impact
This fiscal note is
appropriate. 3/13/90

Original sponsor(s): SEN. BINKLEY, Sturgulewski

1 IN THE SENATE

BY THE FINANCE COMMITTEE

2 CS FOR SPONSOR SUBSTITUTE FOR SENATE JOINT RESOLUTION NO. 62 (Finance)

3 IN THE LEGISLATURE OF THE STATE OF ALASKA

4 SIXTEENTH LEGISLATURE - SECOND SESSION

5 Relating to the bycatch of herring in
6 the Bering Sea groundfish trawl fisher-
7 ies.

8 BE IT RESOLVED BY THE LEGISLATURE OF THE STATE OF ALASKA:

9 WHEREAS herring are caught incidentally in the Bering Sea and discard-
10 ed by fisheries targeting groundfish, and this incidental catch is known as
11 bycatch; and

12 WHEREAS there is a significant relationship between the magnitude of
13 the offshore harvest of herring and the conservation crisis facing discrete
14 stocks of the western Alaska herring fisheries; and

15 WHEREAS the Alaska Board of Fisheries has identified a serious re-
16 source conservation problem with western Alaska herring stocks that are
17 continuing to decline; and

18 WHEREAS two western Alaska commercial sac-roe fisheries, Nelson Island
19 and Nunivak Island, are projected to be closed in 1990; and

20 WHEREAS closure of these fisheries will create an economic crisis in
21 the affected communities; and

22 WHEREAS continued decline of herring stocks will result in restric-
23 tions or closures of the herring subsistence fishery which is a central
24 component of the subsistence economies of the communities in the Nelson
25 Island area; and

26 WHEREAS the anticipated stock decline of 43 percent in the Togiak area
27 will reduce stock abundance to near harvest threshold levels in 1990 and
28 below the threshold for commercial harvests in 1991 if no recruitment is
29 observed in 1990; and

1 WHEREAS similar declines are occurring in other western Alaska herring
2 stocks; and

3 WHEREAS the bycatch of herring by groundfish trawlers in the Bering
4 Sea is reported to amount to an exploitation rate of at least five percent,
5 but it is believed that the data on which this estimate is based represents
6 only a small proportion of the actual herring bycatch due to unobserved and
7 unreported discharges of herring at sea; and

8 WHEREAS the amount and quality of data available about herring bycatch
9 will improve when the National Marine Fisheries Service meets its goal in
10 the Bering Sea of 30 percent observer coverage for vessels in the 60 to 150
11 feet class and 100 percent for vessels over 150 feet; and

12 WHEREAS even with this amount of observer coverage, a problem still
13 exists in determining the herring bycatch and mortality in tows that are
14 retrieved but released without ever being brought on board; and

15 WHEREAS these tows are not accounted for in current statistical data
16 regarding herring bycatch and mortality; and

17 WHEREAS herring suffer significantly higher levels of mortality, as
18 compared to other species, in encounters with trawl gear; and

19 WHEREAS the Board of Fisheries has removed provisions that would allow
20 an increase in the Dutch Harbor food and bait herring fishery in the event
21 that the harvest by the Togiak sac-roe herring fishery is below the allow-
22 able exploitation rate; and

23 WHEREAS the Board of Fisheries has directed the Department of Fish and
24 Game to close the Dutch Harbor bait fishery if subsistence herring harvests
25 are being affected anywhere in western Alaska; and

26 WHEREAS the efforts of the Board of Fisheries and the Department of
27 Fish and Game to address this issue and to support trawl closures to im-
28 prove the opportunity for resource recovery, including expanded state
29 enforcement within the territorial sea, are to be saluted and supported;

1 and

2 WHEREAS the North Pacific Fishery Management Council, at its January
3 1990 meeting, put the public on notice that the council may take emergency
4 action on the herring bycatch issue at its April 1990 meeting; and

5 WHEREAS the council also decided to address the herring bycatch issue
6 during its 1990 regulatory amendment cycle;

7 BE IT RESOLVED that the Alaska State Legislature respectfully requests
8 the North Pacific Fishery Management Council to take emergency action at
9 its April 1990 meeting to implement herring bycatch controls before the
10 critical period between June and December 1990 when herring migrate through
11 areas fished by the groundfish trawl fleet; and be it

12 FURTHER RESOLVED that the Alaska State Legislature respectfully re-
13 quests the North Pacific Fishery Management Council to take action to
14 document the amount of herring bycatch and mortality from released tows and
15 at a minimum provide for observers to document the number of occurrences
16 and classify them by tonnage categories; and be it

17 FURTHER RESOLVED that the Alaska State Legislature respectfully re-
18 quests the North Pacific Fishery Management Council to consider implement-
19 ing a level of observer coverage in the Bering Sea that is higher than the
20 goal already set as a way of obtaining even more accurate information about
21 herring bycatch and mortality; and be it

22 FURTHER RESOLVED that the council respond to the concerns of the
23 fishermen in western Alaska and of the State of Alaska during the 1990
24 regulatory amendment cycle as it addresses the herring bycatch issue.

25 COPIES of this resolution shall be sent to the Honorable Robert A.
26 Mosbacher, Sr., Secretary of the U.S. Department of Commerce; the Honorable
27 Don W. Collinsworth, Chairman, North Pacific Fishery Management Council;
28 the Honorable Steven Pennoyer, Regional Director, Alaska Region, National
29 Marine Fisheries Service; and to the Honorable Ted Stevens and the

1 Honorable Frank Murkowski, U.S. Senators, and the Honorable Don Young, U.S.
2 Representative, members of the Alaska delegation in Congress.

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3/13/90
Zharoff
Amend.
Adopted

Additional WHEREAS's for SJR 62 - Bering Sea herring bycatch

Page 2, after line 7, insert: #1

WHEREAS the amount and quality of data available about herring bycatch will improve when the National Marine Fisheries Service meets its goal in the Bering Sea of 30 percent observer coverage for vessels in the 60 to 150 ft. class and 100 percent for vessels over 150 ft.; and

WHEREAS even with this amount of observer coverage, a problem still exists in determining the herring bycatch and mortality in tows that are retrieved, but released without ever being brought onboard; and

WHEREAS these tows are not accounted for in current statistical data regarding herring bycatch and mortality; and

WHEREAS herring suffer significantly higher levels of mortality -- as compared to other species -- in encounters with trawl gear; and

Page 2, after line 29, insert: #2

FURTHER RESOLVED that the Alaska State Legislature respectfully requests the North Pacific Fishery Management Council to take action to document the amount of herring bycatch and mortality from released tows, and at a minimum provide for observers to document the number of occurrences and classify them by tonnage categories; and be it

FURTHER RESOLVED that the Alaska State Legislature respectfully requests the North Pacific Fishery Management Council to consider implementing a level of observer coverage in the Bering Sea that is higher than the goal already set as a way of obtaining even more accurate information about herring bycatch and mortality; and be it

STATE OF ALASKA

STEVE COWPER, GOVERNOR

DEPARTMENT OF FISH AND GAME

P.O. BOX 3-2000
JUNEAU, ALASKA 99802-2000
PHONE: (907) 465-4210

DIVISION OF COMMERCIAL FISHERIES

March 7, 1990

Mr. Russ Nelson
Observer Program Coordinator
Alaska Fishery Science Center
7600 Sand Point Way, NE
Bin C15700
Seattle, WA 98115

Dear Russ:

As the North Pacific Fishery Management Council begins to focus on herring bycatch, it will become very important to document trawl tows that are retrieved, but released, because they contain too many prohibited species. I recognize that it would be difficult to quantify the tonnage of these tows, but it will be extremely important to document at least the number of occurrences. I understand from your discussions with Fritz Funk last week that there is a field in the observer program data files which identifies unsuccessful tows and that there are codes for gear problems or prohibited species problems. Presumably the codes for this field could identify the particular prohibited species that caused the problem. If they do not, could the codes be modified so that the problem species can be identified?

While it may be difficult to quantify exactly the tonnage of a released tow, it should be possible to do better than merely indicate their occurrence. Could a simple categorical system be established with a small number (perhaps 3 or 4) of tonnage categories, which the observer might record?

The problem of undocumented bycatch will be exacerbated if incentive measures to control bycatch are adopted by the Council. Incentive programs would discourage vessels from having prohibited species catches brought on deck and enumerated by an observer. Unlike some of the other hardier prohibited species, herring mortality is extremely high, even when cod-ends are not brought aboard. For this reason it will become increasingly important to document all sources of mortality on herring stocks induced by

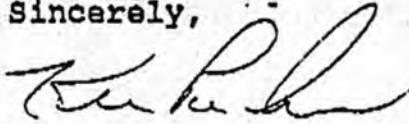
Mr. Russ Nelson

-2-

March 7, 1990

trawling. Please let me know if it is possible to implement these modifications to the observer data records so that more of the trawl-induced mortality can be documented.

Sincerely,



Ken Parker
Director

cc: Dave Cantillon
Dave Carlile
Fritz Funk
Earl Krygier

V:\CFS\Fritz+f\rnelson

STATE OF ALASKA

STEVE COWPER, GOVERNOR

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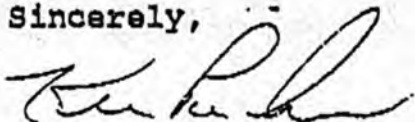
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Ken Parker
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cc: Dave Cantillon
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Earl Krygier

V:\CFS\Fritz+f\rnelson

STR62

Revised 1/12/90

REVISED ESTIMATES OF THE BYCATCH OF HERRING IN 1989 BERING SEA TRAWL FISHERIES

by

Fritz Funk

Leslie Watson

and

Richard Berning

Regional Information Report¹ No. 5J90-01

Alaska Department of Fish and Game
Division of Commercial Fisheries
Juneau, Alaska

January 1990

¹ The Regional Information Report Series was established in 1988 to provide an information access system for all unpublished divisional reports. These reports frequently serve diverse ad hoc informational purposes or archive basic uninterpreted data. To accommodate needs for up-to-date information, reports in this series may contain preliminary data.

EXECUTIVE SUMMARY

Foreign fishing records and scale pattern analyses demonstrate that herring stocks that spawn in Bristol Bay migrate clockwise around Bristol Bay, arriving on the wintering grounds north and west of the Pribilofs in September. Herring stocks that spawn north of Bristol Bay appear to move more directly offshore after spawning. It is uncertain whether herring stocks from Kuskokwim Bay to Nelson Island move directly offshore or follow a clockwise migratory pattern like Bristol Bay stocks. Based on prior joint venture (JV) and foreign records, only 1989 Pacific cod and pollock trawl fisheries that occurred along the herring migration route had the potential to take significant amounts of herring. Yellowfin sole fisheries did not occur near herring spawning grounds during the herring spawning period in 1989.

Herring bycatch by JV fisheries in 1989 was estimated to be 2,588 tonnes. Most of the JV bycatch occurred in pollock fisheries in National Marine Fisheries Service (NMFS) reporting areas 521 and 522 (north and west of the Pribilofs) in the fall. The most comprehensive source of herring bycatch for domestic fisheries for 1989 was obtained by applying average 1983-88 foreign and JV observer bycatch rates by $1/2^\circ$ latitude by 1° longitude area by month to 1989 fish ticket catches by $1/2^\circ$ latitude by 1° longitude by month. Using this method, herring bycatch was estimated to be 1,170 tonnes for domestic Pacific cod fisheries, 3,921 tonnes for pollock bottom trawl fisheries and 386 tonnes for pollock midwater trawl fisheries. Although observer bycatch rates were computed based on the total catch, for ease of computation observer bycatch rates were applied only to the retained catch of the single target species in the fish ticket catch. Because of this, herring bycatch was underestimated by this method. The degree of was underestimation greater for bottom trawl data than for midwater trawl data, because there are usually more species in bottom trawl catches.

Landed discard reported on fish tickets and actual domestic observer catch reports for limited areas were also used to estimate herring bycatch in 1989 domestic trawl fisheries. These estimates were roughly comparable to the herring bycatch computed by applying 1983-88 average observer bycatch rates to the 1989 fish ticket catches. However, landed discard herring bycatch rates also underestimate herring bycatch when at-sea sorting occurs or when trawl cod-ends are released because they contain significant numbers of prohibited species. Total herring bycatch estimated for JV and domestic fisheries for 1989 ranged from 4,521-8,065 tonnes. Because several of the methods used underestimate herring bycatch rates, these estimates represent the lower bound of the actual 1989 herring bycatch.

Bering Sea herring stocks are declining and are projected to decline below threshold levels where commercial fisheries are allowed at Nelson Island and Nunivak Island in 1990. If no recruitment is observed in 1990, the Togiak stock will likely be below its threshold in 1991. Because herring stocks have declined while the bycatch of herring has increased, herring bycatch exploitation rates have increased from less than 2% in 1983 to 4%-7% in 1989, and are projected to increase further in 1990. When trawl herring bycatch is considered, the maximum allowable herring exploitation rates under the Alaska Board of Fisheries herring

Revised 1/12/90

harvest policy are being exceeded.

Subsistence utilization of herring resources is high in some communities of western Alaska, particularly at Nelson Island. If Bering Sea herring stocks continue to decline, subsistence availability of herring may be reduced and further declines in the resource could force reductions of subsistence harvests. Western Alaska communities experienced severe difficulties in harvesting herring for subsistence purposes during herring stock declines in the 1970s.

Fish ticket records of catch by $1/2^\circ$ latitude by 1° longitude by date of landing allow relatively detailed distributions of fishing effort to be examined. Combining these fish ticket records with foreign and JV observer herring bycatch records in the same area and time strata could allow detailed examination of alternative herring bycatch control measures. Herring bycatch control measures were last examined when the draft Bering Sea herring fishery management plan was submitted by the NPFMC to the Secretary of Commerce in November 1983. Since that time, a considerable amount of new data has become available for herring bycatch analysis.

CONCLUSIONS

1. The total herring bycatch in trawl fisheries was estimated to be at least 4,521-8,065 tonnes in 1989.
2. Bering Sea herring stocks are declining and are projected to decline below threshold levels where commercial fisheries are allowed at Nelson Island and Nunivak Island in 1990.
3. Herring bycatch exploitation rates have increased from less than 2% in 1983 to 4%-7% in 1989, and are projected to increase further in 1990.
4. When trawl herring bycatch is considered, the maximum allowable herring exploitation rates under the Alaska Board of Fisheries herring harvest policy are being exceeded.
5. Western Alaskan communities experienced difficulties in harvesting herring for subsistence purposes during herring stock declines in the 1970s.
6. Foreign fishing records and scale pattern analyses demonstrate that herring stocks that spawn in Bristol Bay migrate clockwise around Bristol Bay, arriving on the wintering grounds north and west of the Pribilofs in September.
7. Herring stocks spawning north of Bristol Bay appear to move more directly offshore after spawning. It is uncertain whether herring stocks from Kuskokwim Bay to Nelson Island move directly offshore or follow a clockwise migratory pattern like Bristol Bay stocks.
8. Fish ticket records of herring landed discard underestimate total herring catch, but range from 834-1,038 tonnes for the Unimak Pass area.
9. Herring bycatch estimated by applying 1983-1988 average foreign and JV observer bycatch rates by 1/2° latitude by 1° longitude area by month to 1989 fish ticket catches by 1/2° latitude by 1° longitude by month was 1,170 tonnes for Pacific cod fisheries, 3,921 tonnes for pollock bottom trawl fisheries and 386 tonnes for pollock midwater trawl fisheries.
10. Additional analyses of 1983-1988 observer bycatch rates by 1/2° latitude by 1° longitude area by month could be used to determine appropriate areas and time periods for possible herring bycatch control measures.

Revised 1/12/90

is available, although there were reports of such events occurring in the 1989 fishery. For this reason, the 4,521-8,065 tonne range of herring bycatch estimates computed for the domestic trawl fleet likely represents a lower bound of the actual harvest. Herring mortality in trawl gear is likely to be very high, even if cod-ends are opened immediately after the trawl is raised. Herring bycatch computed by applying JV and foreign herring bycatch rates to fish ticket catch data also underestimated herring bycatch. JV and foreign observer herring bycatch rates are computed as the ratio of the weight of herring to the total catch weight. For ease of computation, observer bycatch rates were applied only to the retained catch of the single target species in the fish ticket catch. The degree of underestimation is greater for bottom trawl data than for midwater trawl data.

Inshore herring fisheries are managed under an Alaska Board of Fisheries harvest policy that sets maximum exploitation rates at 20%. In some areas, the maximum commercial exploitation rate is set at 15% to allow for a historic subsistence utilization. If herring stock sizes decline, the Board has directed ADF&G to reduce the exploitation rate. When herring stock sizes decline below established thresholds in each area, commercial fisheries are closed. The Board of Fisheries has allowed mixed stock herring food and bait fisheries in some areas, but has directed that total exploitation rates not exceed 20%. Based on the stock identification analysis that showed that Togiak stocks were by far the dominant stock in the Dutch Harbor food and bait herring fishery, the Board of Fisheries assigned the Dutch Harbor harvest to the Togiak stock. The Board took action in November 1989 to reduce the Dutch Harbor food and bait herring harvest to no more than 7% of the allowable harvest at Togiak, with combined harvest in food and bait and sac roe fisheries not to exceed 20% of the Togiak stock. The Board further directed ADF&G to close the Dutch Harbor food and bait fishery if subsistence harvests of other stocks from Togiak to Norton Sound were threatened. Because the trawl bycatch exploitation rate has been small and domestic trawl bycatch was unknown, the Board has not previously incorporated trawl bycatch into their Bering Sea herring harvest policy. With the recent evidence that the trawl bycatch exploitation rate is significant, herring stocks are currently being overfished under the Board's harvest policy.

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

DIVISION OF SUBSISTENCE

STEVE COWPER, GOVERNOR

BOX 3-2000
JUNEAU, ALASKA 99802
PHONE: (907) 465-4147

December 5, 1990

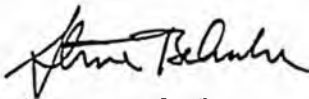
Mr. Clarence Pautzke
Executive Director
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, Alaska 99510

Dear Mr. Pautzke:

Several herring stocks in the eastern Bering Sea have declined to levels below which no commercial fishing will likely be allowed in 1990. If these stock declines continue, subsistence utilization of these herring stocks may also be threatened. Subsistence utilization of herring is particularly important to the local communities of Nelson Island. A report documenting the subsistence utilization of herring in the Nelson and Nunivak Island areas is enclosed for your information.

The bycatch exploitation rate of herring in Bering Sea groundfish trawl fisheries appears to be increasing, even as herring stocks are declining. If Bering Sea herring stocks decline to a level which does not allow enough harvest to provide for subsistence uses, other fisheries which take substantial amounts of herring would have to be closed to provide the subsistence preference required by state and federal law. For this reason it is very important that the issue of herring prohibited species catch measures be dealt with during the 1990 Bering Sea/Aleutians groundfish plan amendment cycle.

Sincerely,



Steve Behnke
Director

Enclosure

cc: Don Collinsworth
Steve Pennoyer, NMFS/AKR
Sen. John Binkley
Ken Parker

**SUBSISTENCE HERRING FISHING IN THE EASTERN BERING SEA REGION:
NELSON ISLAND, NUNIVAK ISLAND, AND KUSKOKWIM BAY**

by

Mary C. Pete

**Alaska Department of Fish and Game
Division of Subsistence
Fairbanks, Alaska**

December 1989

ABSTRACT

This report summarizes information on the subsistence use of herring in the Nelson Island and Etolin Strait region of Alaska. Data were gathered in annual surveys from 1986 through 1988. A complete census of fishing families were surveyed each season to arrive at total harvests. Qualitative information on community experiences with depletions of herring stocks in the late 1960s and early 1970s is included. A brief description of subsistence herring use by five other communities in the Nunivak Island and Kuskokwim Bay areas supplements the more detailed information presented for Nelson Island communities.

Herring is a central component of the subsistence economy of the communities in the Nelson Island area. It comprises the highest proportion of all species harvested of the total subsistence outputs -- 40 percent by weight in Tununak in 1986. Participation, both by individuals and households, in subsistence herring production is high.

Subsistence harvest estimates for Nelson Island communities in recent years (1986 through 1988) have shown substantially higher annual harvests than those recorded in previous years. The recent estimates indicate that herring harvest effort and use was considerable. Over 200 short tons of herring was harvested annually for subsistence use by communities in the Nelson and Nunivak Island districts and the Kuskokwim Bay area combined. This is considerably greater than earlier estimates from the late 1970s which projected that the combined communities in the eastern Bering Sea region took an approximate annual total of 110 short tons of herring for subsistence use. Smaller sample sizes and reduced numbers of fish probably account for much of the difference.

Declines in herring stocks within the past two decades have been attributed to offshore foreign fishing in the 1960s and 1970s. Depletion of herring returning to the Nelson Island area has created hardship for the area residents. They have had to make adjustments. Current projected declines understandably cause concern.



STATE OF ALASKA
OFFICE OF THE GOVERNOR

BILL ANALYSIS

DEPARTMENT Fish and Game	DIVISION Commercial Fisheries	BILL NUMBER SS SJR 62	SPONSOR Binkley
SHORT TITLE OF BILL Relating to the bycatch of herring in the Bering Sea groundfish trawl fisheries			
DEPARTMENT POSITION Support			
PREPARED BY Fritz Funk	DATE 02/14/90	COMMISSIONER'S SIGNATURE <i>[Signature]</i>	DATE 2/16/90

SUMMARY

OTHER AGENCIES AFFECTED BY BILL None	CONSTITUENT GROUP(S) AFFECTED BY BILL All Bering Sea commercial herring fishermen Western Alaska subsistence fishermen
ORGANIZATIONAL SUPPORT FOR BILL Bering Sea Fishermens Association United Villages of Nelson Island Yukon Kuskokwim Fisheries Task Force	ORGANIZATIONAL OPPOSITION TO BILL

FISCAL IMPACT: NONE FISCAL NOTE ATTACHED

BACKGROUND/LEGISLATIVE INTENT
This resolution recognizes the reduced herring stocks in the eastern Bering Sea and the increased trawl bycatches in recent years and requests the North Pacific Fishery Management Council to address the problem as soon as possible. The Council is presently considering measures to limit the bycatch of herring in the Bering Sea for 1991 and will consider emergency action to limit the bycatch in 1990 at their April 15-19 meeting.

ANALYSIS OF BILL/PROGRAM EFFECTS

None

AMENDMENTS PROPOSED

PLEASE ATTACH A SEPARATE SHEET FOR ADDITIONAL COMMENTS OR ANALYSIS.