Permit Stacking

Groundfish fleet harvest capacity reduction is one the primary goals of the Pacific Fishery Management Council (PFMC) as part of a long-term strategy to secure resource sustainability. Secondary to vessel and permit buyback, the Council has suggested exploring options for permit stacking, particularly within the trawl fleet.

The PFMC strategic plan envisions a stacking program that actually reduces the harvest capacity of the fleet and does not simply reduce the number of vessels in the fleet. For example, it would be unfortunate to end up with a few large vessels that are so heavily in debt that they can't maintain their economic viability. In this situation they would be forced to continually expand and diversify into other fisheries in order to postpone inevitable economic failure. This would not give us a healthy coastal economy. Similarly, a reduction in vessels would not result in harvest capacity reduction if the remaining vessels were allowed or encouraged to increase their fishing capacity.

A viable stacking program should be designed to safeguard against:

1) Over-accumulation of harvest capacity leading to adverse economic impacts on fishing dependent communities,

2) Emergence of corporately-owned fishing operations, i.e., banks, processors, permit brokers and other outside investors whose interests are different from family-owned businesses.

3) Little or no reduction in harvest capacity because remaining vessels are allowed to "gear up."

In developing a position statement regarding permit stacking, Pacific Marine Conservation Council focused on provisions found within the Sustainable Fisheries Act passed by Congress in 1996, including:

- Bycatch reduction
- Protection of marine habitat
- Sustainable economic viability of our fishing communities
- Promoting the use of selective gear types and fishing strategies

Sustainable ocean fisheries and coastal economies for future generations.
Pacific Marine Conservation Council Position on Permit Stacking

➢ Bycatch reduction should be mandatory in the evaluation of candidates for permit stacking. The scientific community should set acceptable bycatch rates, in line with sustainable harvest rates for individual species. These rates should then be applied to each gear type and measured continuously through observation. If the reduction cannot be achieved and maintained within a specified time, the vessel would forfeit its eligibility to stack permits or be required to phase in other gear or strategies that are proven to meet bycatch reduction standards. In order to achieve these conservation goals, 100% observer coverage must be required on all vessels with stacked permits.

➢ Caps must be established on the number of permits that can be acquired or owned by an individual or a corporation. Excessive accumulation of harvest rights has adverse effects on the economic and social viability of our coastal communities. Localized accumulation could strain the sustainability of the area where the vessel or vessels consolidating the permits traditionally fished. We suggest that no more than two permits should be stacked on any one vessel and permits not be transferred to a vessel more than 10 feet longer than its original endorsement.

➢ Permit transfers for stacking should be limited to once in a calendar year. This would be consistent with the way permits are presently regulated. Unlimited transfers of permits would not be allowed, since this would actually increase fleet harvest capacity and encourage increased fishing pressure on non-groundfish fisheries.

➢ Second generation trawl permit owners must be on board while fishing. This would prevent the consolidation of fishing rights by non-fishing entities.

➢ As permits are stacked, there should be reductions in the trip limits for stacked permits. These reductions should not be arbitrary. Science should inform the reductions to expressly provide conservation benefits to overfished species, species approaching an overfished state and those species whose stock has not been assessed, and to protect habitat.