

GROUND FISH MANAGEMENT TEAM REPORT ON
AMENDMENT 20: TRAWL RATIONALIZATION ALTERNATIVES
(TRAWL INDIVIDUAL QUOTAS AND COOPERATIVES)

The Groundfish Management Team (GMT) discussed several issues pertaining to the trawl rationalization program including a minimum holding requirement, managing bycatch as a pool in the whiting fishery, the proposed adaptive holdback mechanism, Pacific halibut bycatch quota, and allocating overfished species based on a bycatch rate. The GMT offers the following comments.

Minimum holding requirement

The GMT does not recommend the 500 to 1,000 pound general minimum holding requirement. A general minimum holding requirement may not prove useful for management purposes because the requirement may be filled by species that are not representative of what a trawler may catch. For example, a trawler could fill the minimum holding requirement with spiny dogfish and then target Dover sole. This type of scenario calls into question the utility of establishing a general minimum holding requirement. Enforcement and penalty mechanisms for not covering catch with quota pounds within an established time period may provide a more practical approach.

The GMT is in favor of analyzing a minimum holding requirement for constraining overfished species. The amount of overfished species allocated to individual permits in a rationalized fishery may be minimal and in some cases may result in a handful of fish, which could result in several unintended consequences as outlined in Agenda Item E.9.a. One mechanism that could mitigate the occurrence of uncoverable catch events is to establish a minimum holding requirement for overfished species that covers most of the potential overfished species catch that could occur during a trip.

The GMT specified two mechanisms for implementing this type of provision. One mechanism would establish a minimum holding requirement to access a certain area. These areas would be defined based on the presence of overfished species and the probability that a trawler would catch them during a fishing trip. This would require that trawlers declare their intent to fish in either the area that requires a minimum holding requirement or outside that area. For example, if trawlers intend to fish in depths less than 200 fathoms, a minimum holding requirement for canary and yelloweye rockfish could be required. Vessels could fish deeper without meeting the minimum holding requirement for canary and yelloweye, but would need to meet those minimum holding requirement provisions if they desire to fish shallower than 200 fathoms.

The second concept the GMT recommends for consideration is a minimum holding requirement that allow vessels to enter into voluntary pooling agreements in order to reach that minimum holding requirement. This would require that trawlers forming voluntary risk pools register with, or notify the National Marine Fisheries Service (NMFS) that they are in a voluntary quota sharing pool for a year. This would provide verification that vessels in that pool collectively meet the minimum holding requirement of a given overfished species.

Whiting Individual Fishing Quotas (IFQ) and Collective Pooling of Bycatch Species

The GMT discussed the proposal to pool bycatch species across the whiting fishery, if the whiting fishery is granted IFQ. Under this proposal, participants in the whiting fishery would receive quota of whiting but not receive quota of bycatch species. Bycatch species would be managed in a pool accessible by all whiting sectors or as a pool for each whiting sector. Members of industry clarified that, for the purposes of this proposal, bycatch species are constraining overfished species. The GMT discussed this proposal and believes that managing constraining overfished species across the sector, instead of having an individual limit, has promise and deserves consideration and analysis in the environmental impact statement (EIS). This type of arrangement may encourage collective decision-making and communication which is likely to be a very important element to the successful management of overfished species in a rationalized trawl fishery. If overfished species are allocated at an individual level, this may result in bargaining between members of the industry instead of collective decision making. In such a relationship, some members may have more negotiating power than others and this may not be a desired outcome of the rationalization process. The GMT further notes that the whiting fishery has operated successfully with a common bycatch limit for several years and this provides some empirical justification for considering this proposal in a future rationalization program.

Adaptive Holdback

The Groundfish Allocation Committee Report includes an adaptive management option that provides for up to a 10% holdback of the trawl allocation to address unforeseen circumstances. The GMT supports forwarding this alternative for analysis. While the Groundfish Allocation Committee Report specifically mentions that the potential uses for holdback are not limited to the examples it provides, the GMT notes that development of best fisheries practices is not among those listed. The GMT recommends that this be included as a possible use for trawl holdback and points out that it is consistent with alternatives presented in the EIS analysis leading to Amendment 18. The GMT envisions a process for providing adaptive holdback quota similar to the Council's Operating Procedures for considering exempted fishing permits (EFPs) where proposals would be made to the Council, considered by the Council's advisory bodies, and recommended or not recommended based on their merit and potential outcome.

Pacific Halibut Bycatch Quota

The GMT discussed the concept of managing Pacific halibut in the trawl fishery through the use of individual bycatch quota and is supportive of the concept because it would provide a tool for directly managing the catch of Pacific halibut in the trawl fishery. The GMT also discussed the proposed method of allocating Pacific halibut based on a bycatch rate or proxy. Based on available data the GMT believes that Pacific halibut bycatch quota should be applied for areas north of Cape Mendocino, and that the bycatch rate approach for allocating Pacific halibut be stratified by latitude and depth. The GMT recommends that one latitude area be the Vancouver International North Pacific Fishery Commission (INPFC) area and the other area be the combination of the Columbia and Eureka INPFC areas. Depth-based stratification would occur shallower or deeper than 100 fathoms. Available data from the Northwest Fisheries Science Center's (NWFS) GMT representative indicates that this stratification would appropriately capture the difference in halibut bycatch rates that occur off the West Coast.

Allocating Overfished Species Based on a Bycatch Rate (proxy species allocation)

The GMT discussed the concept of allocating overfished species based on a bycatch rate. The GMT concurs with the concept of allocating overfished species based on a bycatch rate because it would arguably provide more fishing opportunity for more individuals in the trawl fishery than allocating based on landings history. If overfished species are allocated based on landings, a relatively small number of individuals will receive a relatively large share of quota. The GMT discussed the revised proposed methodology for assigning overfished species quota to vessels based on a bycatch rate, target species catch history, and fleetwide average depth of catch of target species and looks forward to reviewing the description of the proposed methodology over the summer. The GMT will report back to the Council on this methodology at the November meeting.

GMT Recommendations:

1. Analyze an alternative that includes a minimum holding requirement for constraining overfished species with a specific area component as well as an opportunity to provide for pooling.
2. Analyze an alternative, specific to the directed Pacific whiting fishery, that issues IFQs for whiting but not for overfished species. Allow overfished species to be managed in a pool, accessible by all whiting sectors or as a pool for each whiting sector.
3. Analyze an adaptive management proposal, consistent with the goals of the fishery management plan.
4. Analyze the allocation of Pacific halibut bycatch quota based on a bycatch rate with depth and latitude divisions.
5. Analyze allocating overfished species based on a bycatch rate (proxy species allocation).

PFMC
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