

**SCIENTIFIC AND STATISTICAL COMMITTEE REPORT ON
AMENDMENT 15: PARTICIPATION LIMITATION IN THE
PACIFIC WHITING FISHERY**

The Scientific and Statistical Committee (SSC) reviewed “Environmental Assessment of Management Measures to Prevent Harm to the Pacific Whiting Fishery” (Agenda Item G.5.b, Attachment 1, September 2007).

The following table summarizes information from the Environmental Assessment (EA) regarding limited entry provisions under the status quo, the number of entities qualifying for a whiting endorsement under each alternative to the status quo, and actual participation in 2005 and 2006.

	CatcherProcessrs	Motherships(MS)	MSBoats	ShoreBasedBoats
Status Quo	Coop	No lim entry (LE)	176 LE permits (derby)	
Alt 1a	11	7*	64	56
Alt 1b	10	6		
Alt 2a	11	8*	64	63
Alt 2b	10	7		
Alt 3	10	7	39	56
2005Partcpn	6	5	18	29
2006Partcpn	9	6	20	37

* Corrections to EA conveyed to SSC by G. Kirchner (ODFW).

Bycatch rates for salmon and overfished rockfish tend to be higher in the spring than later in the season. According to the EA, whiting participation is expected to be higher under the status quo relative to the other alternatives, which could lead to more early season fishing. Potential biological and economic effects associated with this acceleration of fishing activity cited in the EA include: higher salmon and rockfish bycatch, earlier achievement of the shore-based whiting allocation, lower revenue and higher cost per vessel, more pressure on other fisheries once the whiting fishery closes, potentially adverse effects on boats that have few alternatives to whiting, and disruption of processing activity. Little evidence is provided in the EA to substantiate these effects.

Underlying the analysis of biological and economic effects is the assumption that alternatives to the status quo would be more effective than the status quo in preventing acceleration of the derby fishery. The validity of this assumption is not clear in the EA. Specifically, of the 176 catcher boats that hold limited entry permits, only a small number participated in the whiting fishery in 2005-2006 (years of record high revenues and prices). While the alternatives to the status quo would cap whiting participation, the number of mothership and shoreside catcher boats qualifying for a whiting endorsement under each alternative is considerably higher than recent participation and (depending on the alternative) would allow for a doubling or tripling of current participants. In order to demonstrate that the alternatives prevent acceleration of the derby fishery relative to the status quo (as asserted in the EA), it will be important that the EA include a

discussion of why participation would increase even more under the status quo than the doubling or tripling allowed under the alternatives.

The focus of the EA on preventing acceleration of the race for fish appears to pertain to the mothership and shoreside sectors (which are derby fisheries). The effects of the alternatives may be quite different for the catcher-processor sector, which is not a derby fishery. The catcher-processor sector operates under the auspices of the Pacific Whiting Conservation Cooperative (PWCC), which engages in coordinated efforts to limit effort and reduce bycatch. Entry of non-PWCC catcher-processors may or may not transform this sector from a rationalized to a derby fishery. The economic implications of the alternatives for this sector should be addressed in the EA.

The objective of Amendment 15 is “to develop conservation and management measures to protect the West Coast non-tribal Pacific whiting fishery and the participants in the fishery from adverse impacts caused by vessels with no sector-specific historical participation in the Pacific whiting fishery. The proposed limitations on entry are intended to restrict introduction of additional harvest capital in the fisheries, which could result in an accelerated race for fish” (p. 9). Relative to this objective, it is not clear that the status quo will result in an accelerated race for fish relative to the other alternatives. It is also not clear why limited entry for motherships is included among the alternatives, at least as it relates to the race for fish; if there are other reasons for such mothership restrictions, they should be documented in the EA. As indicated above, one area where the alternatives may yield changes in economic efficiency relative to the status quo is the catcher-processor sector. Other than that, the fundamental issue addressed by the amendment appears to be one of distributional equity.

PFMC
09/13/07