

GROUND FISH ADVISORY SUBPANEL REPORT ON TRAWL RATIONALIZATION TRAILING ACTIONS SCOPING, PROCESS, AND PRIORITIZATION

The Groundfish Advisory Subpanel (GAP) heard a report from Mr. Jim Seger on trawl rationalization trailing actions process and prioritization, and Ms. Jamie Goen on the proposed Adaptive Management Program (AMP). and T-flex processes. The GAP offers the following comments and recommendations.

As an overarching comment, members of the GAP are increasingly frustrated with delays in implementing trailing actions already approved by the Council, while at the same time, NMFS continues to bring forward proposals for new work that will further delay critical improvements.

In developing our prioritization of trailing actions, the GAP tried to identify those actions that would have the greatest benefit to fishermen, processors, associated communities, and the trawl rationalization program overall. Specifically, the GAP prioritized those issues that 1) would provide additional opportunity to harvest available quota, 2) could reduce the cost burden on the fleet, and 3) could benefit the greatest number of participants. Based on those criteria, the GAP would like to see the Council prioritize the following issues:

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 - Electronic monitoring
 - Comprehensive RCA modifications
 - Gear Issues
 - Widow reallocation
- 3
 - Whiting season start date

Electronic Monitoring

The GAP recognizes that electronic monitoring (EM) is moving forward as part of a separate action. However, the GAP wants to emphasize that EM development and implementation is the highest priority for stakeholders because we believe it has the potential to reduce costs and improve flexibility.

Comprehensive RCA Modifications

Access to target stocks and the ability to catch target fish more efficiently could help offset increasing costs of participation in the trawl rationalization program. The GAP supports the comprehensive rockfish conservation area (RCA) modification concept put forward by Midwater Trawlers' Cooperative (MTC), Oregon Trawl Commission (OTC), Fishermen's Marketing Association (FMA), Coos Bay Trawlers Association, Environmental Defense (EDF), The Nature Conservancy (TNC), the California Risk Pool, and other partners to collaboratively develop a proposal for RCA modification, taking into account new information about overfished species hotspots and needs of the industry. One of the principal advantages of catch shares is that the

accountability they provide can often replace less effective input controls. While the RCA was an effective tool for minimizing the catch of depleted species before the trawl rationalization program was implemented, hard caps and 100 percent monitoring now ensure that catch limits for the trawl sector will not be exceeded.

Gear Issues

Many pre-individual trawl quota (ITQ) regulations were based on the need to minimize rockfish catch under the trip limit management regime. With 100 percent monitoring and individual accountability, there are now more direct means to control rockfish catch. At the same time, many of the pre-ITQ regulations limit efficiency and some even hamper the ability to fish more cleanly (e.g. two-seam net requirement as part of selective flatfish trawl definition shoreward of the RCA).

Widow reallocation

Widow rockfish quota share was allocated to IFQ participants to provide for incidental catch of an overfished species. Now that widow rockfish is rebuilt, the GAP believes widow rockfish quota share should be reallocated to maximize economic revenue from the fishery. Specifically, it should be reallocated to allow for a target fishery for those who targeted it previously, while ensuring there are adequate amounts for bycatch needs in the whiting sector.

Whiting season start date

This action has been previously approved by the Council. The GAP believes NMFS should prioritize implementation of this issue to provide additional flexibility and opportunity to the whiting fleet. As we stated in our November 2012 statement, a start date of May 15 equalizes the opportunity of all whiting sectors, giving the whiting sector as a whole flexibility to best time harvest and processing to maximize net revenues. It will also simplify the regulatory structure. Ultimately, the GAP would prefer to move forward with a year-round season, but we recognize that such an action requires significant additional analysis. The proposed change is aimed at securing an interim opportunity.

The GAP views all other potential trailing actions to be of lower priority. While we don't comment on all of the other potential trailing actions individually, we would like to provide the following comments on the AMP.

Adaptive Management Program

The GAP does not believe there has been any demonstrated need to implement the AMP. The greatest risk to fishermen, processors, and dependent communities has to do with program costs and inability to access available target species, for various reasons. The current NMFS AMP alternatives do nothing to solve those problems. Moreover, redirecting 10 percent of available quota may in fact cause more problems than it solves.

The GAP also believes that development of an AMP program would take significant Council and NMFS time and resources away from higher priority trailing amendments. In the meantime, the GAP would like to see AMP quota continue to be passed through to the fleet. The GAP believes the appropriate course of action is to wait until the five-year review to conduct an evaluation of problems that threaten the rationalization program overall, and a further assessment of whether the AMP could be a valuable tool in addressing those threats.

T-flex Proposal

The GAP strongly supports the proposed T-flex process to remove regulatory inefficiencies through a comprehensive assessment of pre-ITQ regulations that may no longer be necessary. As you'll note implicitly in all of the GAP priorities, the fishery is now dramatically different than it was pre-rationalization. One hundred percent observer coverage and individual accountability for all mortality have changed the game. We believe that NMFS proposed T-flex concepts recognizes this change and we would like to see it move forward expeditiously.

PFMC

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