

How to proceed with IFQ trailing action - trawl priorities

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The Omnibus regulation package contains a lengthy list of proposed groundfish regulatory changes which makes prioritizing the list difficult. To better frame the importance of one item over another it is suggested to consider the magnitude of the potential economic benefit of a change in comparison to others. To gauge the size of this potential change it is helpful to view the current obtainment of an allocation.

For example, the obtainment of the Pacific whiting allocation is around 98% of the allocation. The obtainment of the fixed gear Sablefish is around 98% of the allocation. On the other hand, the obtainment of most trawl IFQ species is between 15% and 30% of the allocation. Therefore, regulatory changes that pertain to the Pacific whiting or fixed gear sablefish fishery, will provide little additional economic benefit, while changes that pertain to the bottom trawl fishery has great potential for improvement in economic returns.

From this perspective, the trawl industry's top priorities for regulatory changes are Widow rockfish allocation, comprehensive RCA changes, and gear regulation overhaul. These three issues are very much intertwined and need to proceed jointly as a regulatory package. For example, modifications to the RCA's which could result in complete elimination or very specific closed areas would make regulations requiring the use of selective flatfish trawls shoreward of the RCA a meaningless regulation.

The trawl industry pledges to work with the NMFS and Pacific Council staff to expedite and facilitate the development of a proposed regulatory package to achieve these changes.

It is suggested that the first step is to proceed with a review of all the current regulations and to make suggestions to be considered for deletion. The consideration of proposed deletions will include gear regulations or any other trawl regulations that are viewed to no longer have relevance.

The industry will by the end of September provide NMFS and NOAA General Counsel a copy of their proposed deletions. By the end of October NMFS and NOAA General Counsel will respond to the industry suggestions by indicating concurrence that the changes are appropriate for the Council consideration and/or explanations as to why portions of the suggested deletions should not occur. If NMFS and NOAA General Counsel have any suggested deletions that the industry has not included, they will provide those suggestions at the same time.

As a second step, the industry will provide NMFS and NOAA General Counsel with a set of coordinates for proposed alternative to the current trawl RCA's by the end of October for consideration.

Lastly, the industry desires for Widow rockfish allocation to utilize the same time series that was used for all other species of groundfish in the IFQ program. This allocation would set an amount of Widows rockfish aside for distribution as bycatch in the Whiting fishery and then allocate the balance using a combination of catch history and equal sharing.