

## SSC COMMENTS ON THE DRAFT GROUND FISH FISHERY STRATEGIC PLAN

August 16, 2000

### VISION, GOALS AND OBJECTIVES

**Plan:** The Plan contains a number of references to management strategies that create incentives for fishermen to behave in ways that are consistent with Council objectives. For instance:

“Continue to explore the use of higher landings limits as an incentive to fish with bycatch friendly fishing gear or to fish in areas where bycatch is reduced (Recommendation 2, p. 14).

“Under this approach harvest rules would require increased levels of conservatism for stocks where little or no information existed from which to base a harvest level. Such a strategy may encourage acquisition of more detailed information if fishers believe significant quantities of harvest was being lost. The burden to generate that information could be shared between the fishing industry and the government” (last para, p. 16).

“Harvesters should be encouraged to conduct experimental fisheries with alternative gears that selectively harvest the desired productive species while minimizing bycatch of the weak stock.” (last para, p. 17).

**SSC:** Incentive-based strategies, such as those described above, are generally more amenable to enforcement and more conducive to achieving long term objectives and creating partnerships between industry and managers than command-and-control strategies. The SSC recommends that the importance of developing incentive-based strategies be highlighted in the Plan. One way to do this would be to add another paragraph to the vision statement (Section I.B.1, p. 7) that reads something like the following:

“Whenever possible, management approaches will be designed to create incentives for fishermen to behave in ways that are consistent with management goals and objectives.”

### ALLOCATION

**Plan:** The Plan’s goal for allocation is “To distribute the harvestable surplus among competing interests in a way that resolves allocation issues on a long-term basis” (top, p. 35). The Plan also states that “To the extent that the Council is willing to allow quota transfers across gear types and geographic areas, the Council would have fewer allocation issues to contend with over the long term, since adjustments in allocation will instead be accomplished by transfers of quota in the market” (2<sup>nd</sup> para, p. 29).

**SSC:** Although the Plan identifies long term resolution of allocation issues as a goal (p. 35) and identifies transferable IFQs (that is, ITQs) as a potential way to resolve such issues (p. 29), the allocation recommendations on pp. 40-42 focus on “command-and-control” techniques to achieve stability and diversity, with no mention of market-based systems (such as ITQs) to provide flexibility and adaptability. The SSC recommends that market-based systems be included among the management approaches that could be considered to address allocation issues.

**Plan:** “...pressuring economic viability of the open access fishery vessels participating” (3<sup>rd</sup> para, p. 37).

**SSC:** For clarity, replace with something like “...threatening the economic viability of both limited entry and open access participants”.

**Plan:** “...the economic benefits and values of the recreational fishery exceed the loss to the commercial fisheries affected” (p. 43).

**SSC:** Replace “the economic benefits and values of” with “the economic gains to”.

## **CAPACITY REDUCTION**

**Plan:** “Many of these permits were later transferred to vessels that actively participated in the fishery, resulting in overcapitalization, which has been exacerbated by acute harvest restrictions of recent years” (3<sup>rd</sup> para, p. 4).

**SSC:** For clarity, replace with “The gap between harvest capacity and groundfish OYs has been exacerbated by acute harvest restrictions in recent years.”

**Plan:** “If the reduction methods rely primarily on market-based consolidation of permits or IFQs, then the optimum balance of capacity to available resource will occur naturally” (2<sup>nd</sup> to last para, p. 24).

**SSC:** Change “will occur naturally” to “will, if properly designed, occur naturally”.

**Plan:** “...a fleet reduction goal of at least 50% of the current number of vessels is necessary. Depending on the methods of reduction chosen, it may not be possible to achieve a full 50% reduction. In addition, eliminating 50% of lower producing vessels may not sufficiently reduce the capacity of the fleet. That should not discourage the Council from moving forward with capacity reduction under the assumption that any reduction is better than none” (last para, p. 24).

**SSC:** It is important that intermediate steps toward capacity reduction not divert the Council from pressing forward to achieve the amount of capacity reduction consistent with the vision expressed in Section I.B.1 (p. 7) of the Plan. We therefore recommend that the following be appended to the end of the above paragraph:

“However, capacity reduction will not be deemed fully successful until capacity has been reduced to a level that is in balance with the economic value of the resource and those remaining in the fishery are able to operate profitably and flexibly.”

### OBSERVER PROGRAM

**Plan:** “Given the likelihood of limited funding, focus the observer program on specific tasks. The Council may need to prioritize coverages, i.e., focus on collecting total mortality data for overfished groundfish stocks as an initial observer program priority” (Recommendation 3, p. 45).

**SSC:** An important factor that will affect how much an observer program can accomplish with limited funding is the amount of statistical error in the total removal estimates that the Council is willing to accept. We therefore suggest that the above statement be slightly modified by replacing “Given the likelihood of limited funding...” with “Given the likelihood of limited funding and the sampling costs associated with achieving targeted levels of precision in the total removal estimates...”.

### MARINE RESERVES

**Plan:** “Marine reserves can be used to guard against management uncertainty and enhance productivity, but should be considered on their own broader merits rather than solely as a function of the Council’s harvest policy” (Recommendation 7, p. 22).

**SSC:** It would be helpful if the Plan provided some elaboration of the “broader merits” of reserves. Also, does this recommendation mean that the Council should consider reserves on the basis of these broader merits?

**Plan:** Recommendations include “(1) Adopt marine reserves as a fishery management tool for Pacific groundfish and proceed with implementation. (2) Identify the specific objectives that marine reserves are expected to meet. (3) Develop siting and design criteria, including the size of reserves, which will meet these objectives. Analyze options for establishing reserves that set aside 5%, 10% and 20% of nearshore, shelf and slope habitat” (p. 49).

**SSC:** We agree, as indicated in recommendation (3), that siting and design criteria should be based on the objectives of reserves. However, we recommend that the second sentence of recommendation (3) be deleted, on the basis that it would be premature to decide what proportion of habitat to place in reserves before those objectives are defined. The wording of recommendation (1) appears to suggest that marine reserves will be adopted, regardless of their merits as a management tool. The SSC considers it premature to commit to adopting reserves until after management options are developed and evaluated relative to objectives. At the least, if the Strategic Plan Committee intends to retain recommendation (1) and if the rationale for that recommendation is based on the “broader merits” of reserves cited on p. 22 of the Plan, it would be helpful if those merits were mentioned on p. 49 in the context of recommendation (1).

**Plan:** It is not clear whether the Plan intends marine reserves to pertain only to permanent no-take areas or to a variety of types of reserves (e.g., long term temporary versus permanent closures, closures to some versus all sectors of the groundfish fishery).

**SSC:** A sentence or two that clarifies this point would be a useful addition to Section II.A.6 of the Plan.

**Plan:** “Direct the Scientific and Statistical Committee to recommend new methodologies for continued stock assessments and for establishing harvest levels outside the reserves following the implementation of reserves” (Recommendation 5, p. 50).

**SSC:** The SSC would fully expect to play a role in recommending new stock assessment methodologies, should that be necessitated by marine reserves. However, harvest recommendations have customarily been provided to the Council from other advisory bodies (e.g., GMT) -- a practice that we continue to support in the interest of keeping science separate from management.

## GROUND FISH HABITAT

**Plan:** “The Council should consider either prohibiting or modifying any fishing gear or fishing practice determined to adversely impact EFH areas of concern such as nearshore and shelf rock-reef habitats” (Recommendation 1, p. 53).

**SSC:** Just as the Plan recommends that the Council “continue to explore the use of higher landings limits as an incentive to fish with bycatch friendly fishing gear or to fish in areas where bycatch is reduced” (p. 14), similar types of incentives may also be useful for encouraging fishermen to switch from gears and gear configurations that are more destructive of EFH to those that are less so. Therefore, we recommend that the above statement be modified as follows.

“The Council should consider regulatory changes (including incentive systems) that result in modification or elimination of fishing gears or fishing practices that are determined to adversely impact EFH areas of concern such as nearshore and shelf rock-reef habitats.”

## SCIENCE

**SSC:** The SSC sees a need to develop comprehensive bioeconomic models for understanding and evaluating regulatory options. We therefore recommend that the following be added to the list of science recommendations contained in Section II.B. (pp. 55-62) the Plan:

“Promote cooperation and collaboration within the scientific community. Natural and social scientists should routinely work together to ensure that all dimensions of management issues, options and solutions are well reflected in their input to the Council.”

## GENERAL ROLE OF ADVISORY BODIES

**Plan:** “Specific votes on issues, perhaps recorded by affiliation within the advisory body, could also be provided to the Council” (last para, p. 67).

**SSC:** This recommendation is not appropriate to the way the SSC operates. The SSC does not vote. Given the complexity of the technical analyses that we review, our discussions and conclusions regarding such analyses cannot be reduced to simple “yes” or “no” votes. SSC statements are typically finalized by consensus after extensive discussion and therefore do not represent the opinion of any particular individual. Moreover, it is standard practice for SSC members who may have a “vested interest” in a particular topic (e.g., a stock assessment author) to restrict their input on that topic to providing information but not their opinions. We go to great lengths to ensure that our statements are balanced and reflect the general opinion of the SSC; requiring that votes be recorded by affiliation would suggest otherwise.

**Plan:** “The SSC, whose job it is to insure that Council analyses are analytically correct and appropriately focused, can acknowledge for the record that analysts have made a sincere effort to utilize the correct data and methodologies, thus, underscoring the competence of the presenter” (last para, p. 68).

**SSC:** The SSC hesitates to make judgments regarding the intention of the analyst (i.e., whether someone has made a “sincere effort”). We are committed to improving the utility of our statements to the Council, and are concerned that personal judgments of the analyst would detract from the substance of our comments on the analysis itself.

## PLAN IMPLEMENTATION

**Plan:** “What Additions or Changes to Laws and Regulations Would Assist the Council in Making Progress in Achieving Its Objectives?” (p. 65).

**SSC:** The Plan provides some sound suggestions with regard to changes in the Magnuson-Stevens Act and other federal legislation and codes. The SSC recommends that the response to the above question also include a statement indicating the Council’s intent to incorporate the vision and objectives of the Strategic Plan into the goals and objectives of the Groundfish FMP. Considering and reconciling potential ambiguities or contradictions that may exist between the Strategic Plan and the FMP (e.g., should year-round fishing continue to be an FMP objective?) will be important for ensuring that the Council family has a concrete and consistent basis from which to move forward in implementing the Strategic Plan.

**Plan:** “The Council should establish a performance evaluation committee to periodically and critically review progress being made toward Council goals and objectives. The committee should also analyze improvements needed in Council procedures to maintain efficiency” (Recommendation 4, p. 71).

“The Council directs the formation of a ‘Groundfish Strategic Plan Implementation Committee’ ...to ensure continuity and an effective transition to implementation (Recommendation 2, p. 74).

**SSC:** These are excellent ideas. To help monitor progress, the SSC also recommends that a set of annual performance indicators be developed and is willing to assist in the development of these indicators.

**Plan:** “This the option of placing plan review on its agenda if it determines it is necessary” (last para, p. 75).

**SSC:** This looks like a typo. Delete?