

SCIENTIFIC AND STATISTICAL COMMITTEE REPORT ON
SABLEFISH PERMIT STACKING CONCEPT

Mr. Jim Seger briefed the Scientific and Statistical Committee (SSC) on the *Draft Analysis of Permit Stacking for the Limited Entry Fixed Gear Sablefish Fishery*.

The analysis includes a placeholder in Section 1.3.3 for a discussion of the relationship between the permit stacking proposal and the goals and recommendations of the Groundfish Strategic Plan, should the plan be adopted by the Council. This is a good example of how groundfish plan amendments should be routinely related to the strategic plan. The document also contains placeholders for other portions of the analysis that have not yet been completed, including Section 2.0 (description of fishery) and portions of Section 3.3.x (safety, windfall profits, etc.). The analysis, however, was sufficiently complete to allow the SSC to evaluate the essential elements of the voluntary stacking proposal.

The SSC concurs with the following conclusions from the analysis: unless the individual quota (IQ) moratorium is lifted, voluntary permit stacking *per se* is not likely to increase the duration of the fixed gear sablefish season, alleviate the safety concerns and complex management decisions associated with short seasons, or result in significant capacity reduction. In order to accomplish those things, voluntary stacking will need to be followed by a properly designed IQ system (an uncertain prospect at this time, given the moratorium) or some other stringent capacity reduction mechanism. The SSC is concerned about the limited benefits that would accrue from voluntary stacking if the IQ moratorium is not lifted. However, we also realize that it is up to the Council to decide whether that risk is acceptable.

The SSC has several suggestions for clarifying and simplifying the analysis:

Section 1.3 includes nine objectives. Prioritization or elimination of some objectives may help to simplify the analysis.

Section 1.5 describes three possible future scenarios regarding the IQ moratorium: (1) moratorium expires/no new requirements constraining creation of IQs, (2) moratorium expires/some new requirements constraining creation of IQs, (3) continuation of moratorium. The SSC recommends that scenario (2) be eliminated from consideration. While it is a plausible scenario, it is not specific enough to be very useful for the analysis.

Provisions 1-9 should be distinguished in terms of whether they pertain to design features of a stacking program that the Council must decide in advance, or outcomes that are contingent on whether voluntary stacking is followed by an IQ program. For instance, the two fishing duration options presented under provision 5 (extended season vs. modified derby) represent alternative outcomes. Similarly, the two options under provision 9 (open vs. close the daily-trip-limit fishery during the primary fixed gear sablefish fishery) also represent alternative outcomes.