

STATEMENT OF THE GROUND FISH ADVISORY SUBPANEL  
ON 2004 TRIP LIMITS POST-BUYBACK

Mr. Chairman, members of the Council, the Groundfish Advisory Subpanel (GAP) is taking the unusual step of providing comment during the open public comment period because we are concerned about an issue that is, unfortunately, not on the Council agenda for this meeting.

As you know, the trawl buyback which this Council has strongly supported has been approved in a fishery-wide referendum, and we will soon see 92 boats and their associated permits removed from the trawl groundfish fishery. The removals represent nearly 50% of the trawl groundfish effort, a goal sought by the Council in its strategic plan. The remaining vessels will be required to repay the government-backed loan used to fund most of the buyback, but will be compensated in part by increased cumulative limits.

Unfortunately, in planning for this process, the Council neglected to provide for potentially increased cumulative limits during the January-February period. As you know, during this period trawl vessels can safely harvest deep water species with minimal impact on those other species designated as overfished. This fact has been recognized by the Groundfish Management Team (GMT) and the Council in approving 2004 cumulative limits. However, the limits which were approved by the Council at the September 2003, meeting did not take into account the reduced effort which will result from the buyback.

Because the Council has not advertised a potential 2004 cumulative limit increase on its agenda for this meeting, the Council cannot take action to rectify this oversight. Nevertheless, several options are available:

- A member of the Council who voted in favor of the 2004 limits could ask for reconsideration, and the Council could approve cumulative limits that more accurately reflect the change in effort.
- The Council could convene a special meeting, perhaps by teleconference, at which the 2004 cumulative limits could be modified.
- Since the January-February limits will be put in place by NMFS emergency order, NMFS could establish appropriate cumulative limits as part of that order.

The GAP has no preference on which course of action the Council might choose (although the last seems the easiest and most cost-effective to accomplish), but does most strongly urge the Council and/or NMFS to choose one of them. Fishermen voted for the buyback on the understanding that higher cumulative limits would be established, thereby, offsetting their costs to repay the buyback loan. For the Council and NMFS to do nothing clearly breaks a promise to the trawl fleet.

The Council and NMFS have demonstrated many times their ability to rapidly close fisheries when needed. The industry is expecting that same rapid response now to increase limits.

This is a unique situation, where fishermen have agreed to tax themselves to accomplish a federal goal: effort reduction. Don't let us down by accepting the status quo when positive changes could be made.

PFMC  
11/04/03