

GROUND FISH ADVISORY SUBPANEL STATEMENT ON  
FISHERY MANAGEMENT PLAN AMENDMENT 18 - BYCATCH

The Groundfish Advisory Subpanel (GAP) met with Council staff to discuss the preliminary language for FMP Amendment 18 and the preliminary Council Work Plan. The GAP also reviewed the recommendations of the Ad Hoc Allocation Committee on this subject.

In regard to the preliminary fishery management plan (FMP) language, the GAP identified several technical issues that deserve further discussion and review. Due to the minimum time available and the sheer volume of the proposed FMP amendment, GAP members agreed to review the document over the next two to three weeks and provide individual comments to the GAP Chairman, which will be compiled into a comprehensive statement for discussion at the April GAP meeting. Following that discussion, a final set of GAP comments will be forwarded to Council staff.

The GAP also discussed three major issues that were reviewed by the Ad Hoc Allocation Committee and makes the following recommendations:

1. Sectors - While the GAP generally agrees with the fisheries sectors identified by the Ad Hoc Allocation Committee, they note that the language in the preliminary FMP needs to be modified. There is a need to clarify the difference between “limited entry trawl” vessels and “shore-based Pacific whiting boats,” as the latter are a subset of the former in the context of the FMP. The reference to “at-sea Pacific whiting motherships” should be a reference to “vessels delivering to at-sea Pacific whiting motherships.” There is a need for further discussion on how open access vessels are defined, as the “5% of total catch” limit is arbitrary and may put larger directed open access vessels that also fish crab or tuna into the incidental vessel category. Finally, the reference to recreational “vessels” needs to be expanded to encompass recreational anglers fishing from shore or docks, as they too encounter bycatch.
2. Application to species groups - The GAP believes that total catch limits (TCLs) should apply to all species, not just overfished species. If the intent of the Council is to proceed with individual quota (IQ) plans, then potentially every species would have to meet a TCL.
3. Tradeability - The current preliminary language refers to the potential establishment of non-tradeable, vessel-specific TCLs. It makes no sense to have individual TCLs be non-tradeable, especially if an individual quota plan is implemented. Even absent an IQ plan, allowing trading of TCLs would promote efficiency in the fisheries without exceeding OY levels. The GAP believes this language should be modified.

In regard to the preliminary Council Work Plan (Agenda Item F.5.a, Attachment 3), the GAP suggests two changes:

1. In Section 3.1.2 (page 5), add “Open Access sub-sector: canary rockfish” to the bulleted list. The GAP notes that observer coverage has been extended to the open access fleet and, thus, there should be data available to analyze establishing TCLs for this species, which is the most constraining coastwide.
2. Add as a priority task completion of the Council’s efforts to identify and potentially cap the number of participants in the groundfish open access fishery. Regardless of whether the Council pursues an IQ system, TCLs, or just status-quo management, we need to get a handle on this sector of the fishery. The development by California and Oregon of nearshore fisheries management plans makes this task much easier than it was several years ago. We need to finish the job already begun.

PFMC  
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