

STAFF REPORT:  
ISSUES FOR COUNCIL CONSIDERATION

There are two main decision areas to be addressed in the trawl individual fishing quota (IFQ) analysis:

1. specification of the broader management regime within which the IFQ program or permit stacking would be implemented, and
2. specification of the IFQ program and permit stacking alternatives.

Proposals are presented here for reorganizing the alternatives addressing each of these decision areas, to facilitate a more efficient and informative analysis. Additionally, with respect to each of these areas, there are a number of design issues which, if addressed at the June and fall 2006 meetings, may facilitate a more targeted and efficient analysis. Resolution in one of these areas, processor definitions and supporting data, is essential in order to proceed with an analysis of an initial allocation of IFQ to processors.

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## Management Regime Alternatives

### *Restructuring*

<b>TASK: Provide guidance, if the proposed reorganization is not acceptable.</b>
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At its June 2005 meeting, the Council was presented with the suite of management regime alternatives identified in the first column of the following table. Council actions in June and November 2005 left the management regime alternatives specified in the second column. In the process of developing plans for the analysis, it became apparent that there were not broad differences between Alternative 3 and Alternative 4 in the

second column. Alternative 3 provided an option for low OY management<sup>1</sup> and Alternative 4 did not provide such an option. Maintaining separate alternatives to address these differences would require substantial repetition and not provide more information than could be provided by treating the differences as options within a single alternative. Therefore, Alternatives 3 and 4 have been tentatively combined into a single alternative for Council consideration and are presented as such in the stage one analysis. If the Council would like to maintain separate alternatives to address the low OY management issue, analysts are prepared to make the necessary modifications to the stage one analysis before proceeding.

Alternatives in the Scoping Document, as of June 2005	Alternatives after Council Actions, as of November 2005	Revised Alternatives (Proposed for Consideration June 2006)
1. No Action 2. IFQ for Trawl Target Species and Species for Which There is a Trawl Allocation 3. IFQ for Groundfish Except "Other Fish" 4. IFQ for All Groundfish and Options for Halibut IBQ 5. Cumulative Catch Limits 6. Cumulative Catch Limits and Permit Stacking 7. Cumulative Catch Limits and Permit Stacking with Extended Cumulative Limit Periods	1: No Action 2: IFQs for Trawl Target and Species for Which There is a Trawl Allocation 3: IFQs for All Groundfish Species Except "Other Fish" and Low OY Management 4: IFQs for All Groundfish Species Except "Other Fish" and No Low OY Management 5. IFQs for All Groundfish 6 Permit Stacking with Full Cumulative Catch Limits for Each Stacked Permit (No Extended Periods).	1: No Action 2: IFQs for Trawl Target and Species for Which There is a Trawl Allocation 3: IFQs for All Groundfish Species Except "Other Fish" (options with and without low OY management) 4. IFQs for All Groundfish 5. Permit Stacking with Full Cumulative Catch Limits for Each Stacked Permit (No Extended Periods).

(NOTES: "IFQs Only For Overfished Species" was added as an alternative in June but removed from consideration in November. Alternative 2 also includes low OY management provisions.)

### **Specification of Design Elements**

The IFQ management regime alternatives (Tables 2-1 and 2-3 in Agenda Item F.3.b, Attachment 1) do not completely address the rules that would apply for vessels participating in both the shoreside whiting and shoreside nonwhiting fisheries (Element 2) and in both the limited entry trawl and limited entry fixed gear fishery (Element 3.2). Similarly, the permit stacking alternatives did not completely address these combinations, nor did they address the use of trawl and open access gears (exempted gear and unendorsed longline or fishpot) (Element 3.1). Three other areas not completely specified were whether there should be accumulation caps on transferable cumulative limits (Element 1.3), procedures for rolling over whiting IFQ between whiting sectors (Element 2.3), and the possible extension of the cumulative limit period to longer than 2 months (Element 2.4). Finally, outstanding was the issue of the threshold that might be applied for determining when low OY management measures should be applied (Element 1.4). The TIQC is being asked to review and report recommendations to the Council on each of these issues.

<sup>1</sup> For Alternative 3 in the 2<sup>nd</sup> column, when a species was determined to be at low biomass levels, management of that species would have switched from IFQs to nontransferable cumulative limits.

Three elements have been added to the end of the management regime alternatives in order to fill out the permit stacking alternative and cover related decisions in one place: Element 4, at-sea monitoring; Element 5, area management; and Element 6, sector allocations. The provisions for these elements are not new and are derived from decision tables in the scoping document.

### **Vessels Participating in Both the Shoreside Whiting and Shoreside Nonwhiting Fisheries**

**TASK: Provide guidance, if the proposed options are not acceptable.**

Provisions have tentatively been added to the alternatives specifying that a whiting closure for shoreside trips would be implemented by the imposition of a whiting cumulative catch limit (all alternatives) and that such whiting cumulative limits would not be stackable (as part of an Alternative 2 transferable cumulative limit provision or as part of an Alternative 5 permit stacking system). For Alternative 2, whiting may be taken on both shoreside whiting and shoreside nonwhiting trips. Different types of whiting IFQ would be issued for the directed shoreside whiting trips and for incidental whiting catch on shoreside nonwhiting trips. Nonwhiting trips with incidental whiting catch would be constrained by year-round cumulative limits and whiting IFQ issued for nonwhiting trips would be required to cover the incidental catch. Directed shoreside whiting IFQ could not be used outside of the whiting season. Vessels which engage in both directed whiting and nonwhiting trips would have to use directed shoreside whiting IFQ for whiting targeted trips and use incidental whiting IFQ to cover incidental catch on nonwhiting trips. For Alternatives 2, 3, and 4, IFQ would still be required for whiting taken during closures, such that whiting catch would be constrained both by the IFQ requirement and cumulative limits. Also, when a vessel is making a whiting trip, nonwhiting catch taken on the trip would be limited to a single limit for each cumulative limit (Alternative 2) or permit stacked (Alternative 5) (i.e. even if a vessel stacks cumulative limits or permits for the purpose of making nonwhiting trips, while making whiting directed trips it would receive no credit for stacking).

### **Vessels with Limited Entry Trawl and Limited Entry Fixed Gear Permits**

**TASK: Provide guidance, if the proposed options are not acceptable.**

The alternatives do not specify how catch taken by vessels with limited entry trawl and limited entry fixed gear permits will be treated. Options for consideration are provided under Element 3.2. These options include not requiring IFQ for fixed gear catch (Alternative 2), and not requiring IFQ for catch taken toward limited entry fixed gear cumulative or daily limits but allowing fixed gear catch in excess of such limits, if the catch is covered trawl with IFQs (Alternatives 3 and 4).

For the permit stacking alternative, two initial options are provided for consideration. The first applies the LE fixed gear rules any time a vessel is using fixed gear, the second applies the LE fixed gear rules when the vessel is fishing toward a sablefish tier limit but

constrains the vessel to the trawl limits (including stacked limits) when it is not fishing toward the tier limit.

### **Limited Entry Trawl Vessels Using Open Access Under the Permit Stacking Alternative**

**TASK: Provide guidance, if the proposed options are not acceptable.**

The permit stacking alternative does not specify how catch taken with open access gear (exempted gear longline and fishpot) will be managed. Two options for consideration are provided in Element 3.1. The first would be to continue to apply the open access trip limits. The second is to apply the LE trawl cumulative catch limits and permit stacking provisions along with a requirement that landings be made in compliance with the catch limit monitoring program (In Table 2-1, Element 3.1 and 3.2. In Table 2-3, Element 3.1, Options 3.1.4.1 and 3.1.4.2; and Element 3.2, Options 3.2.3.1 and 3.2.3.2).

### **Accumulation Caps for Transferable Cumulative Limits**

**TASK: Indicate whether or not there should be caps on stacking of transferable cumulative limits and if so the level of the caps that should be considered.**

Under Alternative 2, species for which there is not a trawl allocation would be managed with transferable cumulative limits. For IFQs and permit stacking, caps have been specified for the amount of fish harvesting opportunity a person or vessel can accumulate. There is no cap specified with respect to the Alternative 2 transferable cumulative limits.

### **Rolling Over Unused Whiting IFQ Part Way Through the Season Under Alternative 2**

**TASK: Provide options for analysis.**

Under status quo management a roll-over of unused allocation from one sector to another may occur if NMFS determines on September 15<sup>th</sup> that one sector's allocation is likely to go unused. Management regime Alternative 2 specifies that there be an option for a midseason rollover of IFQ from one sector to another. Two examples of how this might be achieved are provided in Sub-option 2.3.2.2 of Table 2-3. The first approach specifies that the IFQ ownership not change but rather the sector designation be lifted on some segment of the unused quota after a certain point in the year. The main issue under this approach may be that it could effectively eliminate the sector designations if individuals from one sector pay those in another sector not to use their quota so that it can be transferred between sectors toward the end of the year. The second approach specifies that unused IFQ be ceded back to the program for redistribution among other holders equally, via lottery or through other means. The main issue under this approach might be that individuals may apply to receive the redistribution not with the intent of using the redistribution but rather to acquire quota to sell.

## Lengthening the Cumulative Limit Period Under Alternative 2

**TASK: Provide guidance, if the proposed option is not acceptable.**

Alternative 2 specifies that the cumulative limit periods might be lengthened but does not specify an option for the duration of the extension. The option for lengthening the cumulative period has tentatively been specified as a 4-month period, pending TIQC and Council review. The following outlines how management might function under a variety of limit period lengths.

Cumulative Limit Period	Function and Adjustment Under an Extended Cumulative Limit Period
1 year	The fishery would function either as an individual quota fishery in which each permit has one block of quota for each species/species group; or as a derby, if cumulative limits were set higher than the amounts that would constitute a quota.
6 months	The second 6-month period would function similar to the one-year period. Because complete data on the first period would not be available at the start of the second period, the second period would need to be started with low limits that would be increased after the results from the first six months are assessed. The adjustment for the second period could occur in late July (outside the Council meeting) or September (at the Council meeting). Excess catch of a single incidental species in the first period could severely limit opportunities in the second period.
4 months	The second period adjustment would have to occur after its start, therefore cumulative limits would likely need to start low then be increased after the assessment of the first period was complete. The second period adjustment could occur in late May (outside the Council meeting) or June (at the Council meeting). Alternatively, all adjustments could be made in the third period. The second period would end August 31 and the third period adjustment could be made at the September Council meeting. The third 4-month period would function similar to the one-year period.
3 months	A three-month period would require major reconfiguration of models and estimates from the observer program. It might function similar to the two-month cumulative limits, but would likely require either action outside of a Council meeting or mid-period adjustments.

NOTE: These scenarios assume cumulative limit periods of equal length. Other approaches could be constructed with periods of varying length, for example, the periods for a single year might run 4-months, 2-months, 4-months, 2-months.

## Threshold for Triggering Low OY Management

**TASK: Provide guidance, if the proposed option is not acceptable.**

Under Alternative 3, whether or not low OY management would be imposed would be determined during the biennial management process. Under Alternative 2, a threshold would be established below which the switch to low OY management would be automatic. Under low OY management, catch for the low OY species would be controlled through nontransferable cumulative catch limits. (Under Alternative 2, low OY management would apply only to those species managed with transferable cumulative catch limits; under Alternative 3, low OY management would apply to any species managed with IFQ.).

For Alternative 2, only one threshold has been suggested, and that threshold is supplied as an example: “25% of  $B_{msy}$ ”). Since no other thresholds have been put forward at this time, it is suggested that  $B_{25\%}$  be specified as the threshold for the purpose of analysis.

# IFQ Program Alternatives

The following table describes the design elements which vary between the IFQ program alternatives. Highlighted edits in the first row indicate the modifications proposed to streamline the analysis (with explanation provided in adjacent shaded area). Other shaded areas indicate provisions that may benefit from additional attention early in the second stage of developing the analysis.

Table. Differences between the IFQ programs, proposed revisions to the initial allocation of quota shares among eligible groups and other provisions which may benefit from some additional attention early in the analytical process.

Program A	Program B	Program C
Initial Allocation of Quota Shares, Section B.1.0		
<p><i>Eligible Groups:</i> 50% to current permit owners; 50% to processors.</p>	<p><i>Eligible Group Suboption B-1:</i> 100% to current permit owners.</p> <p><del><i>Eligible Group Suboption B-2:</i> Nonwhiting--100% to current permit owners. Whiting--50% to current permit owners; 50% to processors.</del></p> <p><del><i>Eligible Group Suboption B-3:</i> 90% to current permit owners; 10% to processors.</del></p>	<p><i>Eligible Groups:</i> 75% to current permit owners; <del>25% to processors, with the remainder to be divided between processors and the community stability holdback (no less than 5% and no more than 20% to either group).</del></p>
<p>Programs A and B provide a range which, in combination with information from program C would allow the Council to select an IFQ allocation for processors of somewhere between 0% and 50%.</p>	<p>Suboption B-2 was an amalgam of Program A for the whiting fishery and Program B Suboption B-1 for the nonwhiting fishery. The description of the alternatives should identify that an option like Suboption B-2 is being considered. The analysis of the programs should adequately bracket the programs, providing the Council flexibility to adopt an option like Suboption B-2.</p> <p>Suboption B-3, a 10% processor allocation, is in Program C. The spread of allocations to permit holders (50% in Program A, 75% in Program C, and 100% in Program B) should adequately bracket an action in which 90% would go to permit holders.</p>	<p>For the analysis, use 10% to processors and 15% to communities.</p> <p>With this range of alternatives, the analysis should allow the Council to reasonably select options such as a 75/25 permit/processor split, a 75/25 permit/community-stability-holdback split, or a 90/10 permit/processor split.</p>
<p><i>Processor Definition:</i> Use special IFQ program definition (processors: receive and process unprocessed fish; or catch and process).</p>	<p><i>Processor Definition:</i> Use FMP definition (processors process unprocessed and already processed fish or receive live fish for resale).</p>	<p><i>Processor Definition:</i> Same as Program B.</p>
<p>For June 2006: Issues relating to the definition of processor and qualifying processing history need to be addressed and are discussed in the text. The processors eligible to receive an initial allocation would not necessarily be those listed on the fish tickets. The primary concern is identification of the needed data for the initial allocation and analysis.</p>		

Program A	Program B	Program C
<i>Recent Participation Periods:</i> Harvesters, including catcher processors--1998-2003. Shoreside Processors and Motherships--1999-2004.	<i>Recent Participation Option B-1:</i> None.  <i>Recent Participation Option B-2:</i> 1998-2003.	<i>Recent Participation Periods:</i> Same as Program A.

For Fall 2006: The current recent participation requirements leave to the analysis the development of information that will be used to determine the level of activity required to meet the requirement (e.g. number of pounds or landings required to qualify as a recent participant. Information developed early in the second stage of the analysis may help the Council narrow the options, and thus facilitate a more efficient and focused analysis.

<i>Weighting Among Years:</i> Use pounds from each year to calculate catch history.	<i>Weighting Among Years:</i> Use percent of total pounds for the year to calculate catch history for each year.	<i>Weighting Among Years:</i> Same as Program B.
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For Fall 2006: The issue of weighting among years may be examined quantitatively. If the results of the analysis enable the Council to make a clear determination of preference in this area, it will be possible to efficiently produce a more focused analysis.

For Fall 2006: Proxy Species. None of the current options include the possibility of using proxy species to allocate species for which it would have been desirable to minimize incidental catch, or for which the quality of catch history data is poor. Use of proxy species is, however, included in the list of options the Council may want to consider at time of final implementation. If there is a significant chance that the use of proxy species will be considered as part of the final action, it may be worthwhile to provide some preliminary analysis and consider inclusion of the option in one of the main program alternatives.

#### IFQ/Permit Holding Requirements and IFQ Acquisition, Section B.2.0

<i>Rollover to Following Year:</i> 10% for nonoverfished species and 5% for overfished species.	<i>Rollover to Following Year:</i> 30% for nonoverfished species and 30% for overfished species.	<i>Rollover to Following Year:</i> 5% for nonoverfished species and none for overfished species.
<i>New entrant provisions:</i> No special provisions.	<i>New entrant provisions:</i> No special provisions.	<i>New entrant provisions:</i> Lottery for new entrants to acquire revoked shares.
<i>Community Stability Holdback:</i> None.	<i>Community Stability Holdback:</i> None.	<i>Community Stability Holdback:</i> up to 20%.
<i>Leasing:</i> Allowed.	<i>Leasing:</i> Prohibited.	<i>Leasing:</i> Allowed.
<i>Transfer Period:</i> Year round	<i>Transfer Period:</i> January-October	<i>Transfer Period:</i> Year round
<i>Accumulation Limits:</i> 50% or none.	<i>Accumulation Limits:</i> Consider all limits as suboptions.	<i>Accumulation Limit Suboption C-1:</i> 1% or 5% <i>Accumulation Limit Suboption C-2:</i> 10% or 25%

For Fall 2006: The current range of accumulation limits is quite broad, even within the individual programs. Accumulation limits may have a significant influence on the long term effects of the IFQ program. Information on the distribution of catch history may allow the Council to narrow these limits.

#### Program Administration, Section B.3.0

<i>Enforcement Program 2:</i> 100% at-sea monitoring (observer), discards allowed. 100% shoreside monitoring. Upgraded bycatch reporting. Electronic state landings tracking system. Licenses required for delivery sites. Unlimited landing hours.	<i>Enforcement Program 1:</i> 100% at-sea monitoring (observer), full retention required. 100% shoreside monitoring. Electronic state landings tracking system. Limited ports of landing, no licenses required for delivery sites. Limited landing hours.	<i>Enforcement Program 3:</i> 100% at-sea monitoring (video or observer), discards allowed unless monitoring is with video cameras. Upgraded bycatch reporting. Federal electronic landings tracking system parallel to state system. Opportunity to monitor shoreside. Licenses required for delivery sites. Unlimited landing hours.
<i>Central lien registry:</i> Limited to necessary ownership information.	<i>Central lien registry:</i> With all ownership information.	<i>Central lien registry:</i> With all ownership information.
<i>Cost Recovery:</i> Up to 3%.	<i>Cost Recovery:</i> Up to 3%.	<i>Cost Recovery:</i> Full.
<i>Data Collection:</i> Expanded voluntary.	<i>Data Collection:</i> Expanded mandatory.	<i>Data Collection:</i> Expanded mandatory.

## ***Restructuring***

**TASK: Provide guidance, if the proposed alternatives are not acceptable.**

A proposal is made here to restructure the options with respect to the initial allocation of IFQ between harvesters, processors and community stability holdback. The restructuring is intended to simplify the analysis by providing clear sideboards (the Program A 50/50 split between permits and processors, and the Program B 100% allocation of IFQ to permit holders) and placing all the midpoints in Program C. Program C would allocate 75% to permit holders and 25% to be divided between processors and community stability holdback with no less than 5% and no more than 20% going to either. For the purpose of analysis, the Program C division would be 10% to processors and 15% to community stability holdback. This approach then brackets the options by providing analysis of 100%, 75%, and 50% to permit holders, 50%, 10% and 0% to processors, and 15% to community stability holdback. It should be reasonably possible to infer from these alternatives the effects of all mixes previously identified including providing 50% of the whiting IFQ and 0% of the nonwhiting IFQ to processors, and providing up to 20% of the IFQ for community stability holdback.

Note: also embodied in this revision is a modification of the description of the derivation of the community stability holdback. The holdback was previously specified as an annual withholding of quota pounds to be reallocated to cooperatives of IFQ holders coming forward with proposals that benefit communities. This modification would specify the holdback of quota shares rather than quota pounds. The approaches are mathematically equivalent. Specifying community stability holdback in the same section of the program as the initial permit/processor division of quota shares clarifies the eventual distribution of quota shares and pounds.

## ***Specification of Design Elements***

The main IFQ design element issue needing attention at this meeting is the definition of processor and the measures of processing history that would be used for an initial allocation of IFQ to processors. It may be possible to conduct analyses over the summer that would provide useful information on formulas for initial allocation (in particular, recent participation requirements, the measurement of catch history as annual proportions of total landings rather than pounds of total landings, and use of proxy species) and accumulation limits. Such information may help the Council ensure that the most relevant options are covered in the final analytical package and facilitate an efficient and focused analysis.

## Processors and Processing History

**TASK: Determine whether or not data sets have been identified that will be suitable to support an initial allocation to processors.**

The IFQ programs include options for an initial allocation of IFQ to processors. After the initial allocation, the IFQ would be freely tradable, i.e. IFQ allocated to permit holders could be owned by processors or anyone else eligible to own IFQ, and IFQ allocated to processors could be owned by permit holders or anyone else eligible to own IFQ. For any allocation to proceed, there must be credible and verifiable documentation of the criteria on which the allocation will be based. In this case, the proposed criterion is processing history.

“Processing or to process” means the preparation or packaging of groundfish to render it suitable for human consumption, retail sale, industrial uses, or long-term storage, including, but not limited to, cooking, canning, smoking, salting, drying, filleting, freezing, or rendering into meal or oil, but does not mean heading or gutting unless additional preparation is done. [emphasis added]

Using this definition of processing, the TIQC identified two definitions for processor.

Definition of Processor	
<b>Option 1</b>	<p>Using Special IQ Program Definition for Processors: The processor is the entity which -</p> <ol style="list-style-type: none"> <li>1. after processing, sells his or her own LE trawl vessel-caught groundfish directly to a wholesale or retail market; OR</li> <li>2. buys unprocessed trawl-caught groundfish, processes it, and sells it to the wholesale or retail market.</li> </ol> <p>The entity is defined as:</p> <p>Suboption 1(a)(i) the processing facility and allocation goes to the current owner, unless leased, in which case it would go to the current lessee.</p> <p>Suboption 1(a)(ii) the processing facility and allocation goes to the current owner.</p> <p>Suboption 1(b) the person processing (individual, partnership, corporation or other entity).</p>
<b>Option 2</b>	<p>FMP Definition. A processor is a-  “person, vessel, or facility that engages in processing; or receives live groundfish directly from a fishing vessel for retail sale without further processing.”  Same suboptions for definition of entities as in Option 1.</p>

In specifying the processing history on which the allocation should be based, the TIQC recommended that processors only receive credit for fish they process (fish passed through to another processor without processing should not be counted). The scoping document noted that information beyond what is on fish tickets will be needed to substantiate processing activities (fish tickets do not indicate whether or not the entity receiving the fish processed it and some processors may not be listed on a ticket for the fish they processed). Under the definitions of processing and processors, qualifying processing history could potentially accrue to the second, third or more handlers of the fish, including restaurants and grocery stores. (Note: the IFQ program prohibits IFQ

ownership by any entity not eligible to own a US documented fishing vessel, therefore, foreign owned processors would not qualify for IFQ).

Status of entity as a processor based on the processor definitions.					
Do they take ownership of the fish?	Is the fish received processed?	Does the entity process it?	Category	Eligible for an Initial IFQ Allocation as Processor?	
				Option 1 Definition	Option 2 Definition
Yes	No	Yes	Processor (Including: Operations that Both Harvest and Process AND Operations that Acquire Unprocessed Fish from a Vessel/Receiver/Dealer/Buyer)	Yes	Yes
No	No	Yes	Custom Processor	No	Yes
No	No	No	Buyer	No	No
Yes	No	No	Fish Receiving-Station/Dealer	No	No
Yes	Yes	Yes	Secondary Processor	No	Yes
Yes	Yes	No	Fish Dealer/Wholesaler	No	No

To date we have not been able to identify the data set which would support an allocation to processors based on one of these definitions of processing history. On May 16, 2006, a letter was sent to processor representatives on Council advisory bodies explaining this problem and requesting their help in identifying data sets that could be used for an initial allocation and analysis. The TIQC will be addressing this issue at their June 11, 2006 meeting.

### **Allocation Formulas and Accumulation Limits**

**TASK: Schedule consideration for fall Council meeting.**

Some additional preliminary analysis of allocation formulas and accumulation limits may enable the Council to narrow the some of the program options, thereby facilitating a more efficient and focused analysis. This work could be conducted and made available for the Council in the fall of 2006. Additional explanation of the issues is provided in shaded sections of the table displaying the differences among IFQ programs.