

GROUND FISH ADVISORY SUBPANEL REPORT ON AMENDMENT 20: TRAWL
RATIONALIZATION ALTERNATIVES (TRAWL INDIVIDUAL QUOTAS AND
COOPERATIVES)

The Groundfish Advisory Subpanel (GAP) heard a presentation from Mr. Jim Seger, Council Staff, on the current status of the Trawl Individual Transferable Quota (ITQ) program and the recommendations from the May Groundfish Allocation Committee (GAC) meeting to refine the alternatives.

The GAP agrees with the recommendations set forth in the GAC Report (Agenda Item E.8.b) except for the following:

Initial Allocation

Under the allocation formula, the GAP agrees with the Trawl Individual Quota Committee (TIQC) that an option that analyzes an equal division of the buy back permits' pool of quota shares (QS) among all qualifying permits plus allocation of the remaining QS based on each permit's history should be included. This option is described in Agenda Item E.9.a, Table 2, page 14. Under this proposal everyone who is issued quota share will have access to all fish species. As the system starts up, fishermen may need access to fish they have not caught historically and this option provides access to those fish.

Adaptive Management

GAP also recommends that the Adaptive Management alternative that requires a 10% holdback of QS on an annual basis should not be included in the analysis. There are potentially unforeseen consequences for all Council actions and withholding 10% of the quota to accommodate these uncertainties could be overly burdensome to the industry. There is also added administrative burden in terms of the complexity of the analysis. The GAP is concerned that analyzing this unnecessary alternative will slow the process down even further.

Split Loads and Monitoring Program

The GAP concurs with the TIQC that an option that allows a vessel off-load to be split between different locations should be considered. With expanded monitoring both shore-side and at-sea there is no reason that loads could not be split. In fact, in order to foster additional competition and in order to find markets for fish that will be required to be retained, it actually makes more sense to allow split loads. Further the GAP does not believe that split loads should be confined to the same port. Vessel Monitoring Systems provide a "track" of the vessels trip so enforcement issues should not be significant.

Whiting bycatch

The GAP supports including an option for analysis that allows the whiting fishery to pool bycatch in lieu of issuing individual quotas. Currently the whiting industry is regulated using bycatch caps and the industry believes that this type of management approach works best for this sector of the industry. An alternative that analyzes a continuation of a successful approach should be included in the analysis.