

GROUND FISH ADVISORY SUBPANEL REPORT ON
FISHERY MANAGEMENT PLAN AMENDMENT 20 – TRAWL RATIONALIZATION

The Groundfish Advisory Subpanel (GAP) spent a day and half discussing the trawl rationalization fishery management plan amendment. In addition to hearing presentations from Jim Seger and Merrick Burden, we reviewed the Groundfish Allocation Committee report and worked from the document Agenda Item F.3.b, Key Decisions. We took public comment on each issue that we deliberated on.

The GAP would like to encourage the Council to make as many final preferred option decisions as possible while acknowledging that there are many more minor decisions to be made in the coming months prior to final implementation.

The GAP has the following comments and recommendations:

1. Individual Fishing Quotas (IFQs) or Co-ops

The GAP recommends that the at-sea sectors (catcher/processors and mothership sectors) be managed by co-ops and that the shoreside fishery should be managed under an Individual Trawl Quota (ITQ) program. While the shoreside whiting sector voiced strong support for a cooperative approach to management, this option is not currently available to managers and would require an act of congress to move forward.

2. Species Covered

The GAP recommends that for species managed under an ITQ system, ITQ is required for all species except Longspine South of 34°27", Minor Nearshore Rockfish North, Minor Nearshore Rockfish South, Black Rockfish (WA), Black Rockfish (OR-CA), California Scorpionfish, Cabezon, Kelp Greenling, Shortbelly, Other Rockfish, Spiny dogfish. These species are either not caught or rarely caught in the trawl fishery and would be more easily managed through a monitoring system.

3. Number of Trawl Sectors

The GAP recommends that there be three trawl sectors and the shoreside whiting and non-whiting fisheries should be managed as one sector. The shoreside fisheries should be managed as one sector to maximize the flexibility of quota holders to cover overages or move quota to cover bycatch as necessary. If voluntary co-ops are to form in the shoreside whiting fishery it is essential that an adequate amount of bycatch to be brought to the pool. If the shoreside fisheries are managed as one sector it will maximize flexibility and enhance the formation of co-ops. Four sectors also drive up the administrative cost of the program.

4. Processor Linkage in the Mothership Co-op Program

A majority of the GAP (13 in favor, 1 against, 3 abstentions) recommends including a processor linkage in the mothership co-op program and there is strong support from the industry for a linkage. The GAP supports an option where 80 percent of a catcher vessel's catch must be delivered to the mothership that they delivered the majority of their catch to in the previous year, unless they participate for a year in the non co-op fishery (i.e. the GAC Option 2 with 80/20

linkage). The GAP supports the GAC recommendations for when the mothership leaves the fishery: allowing a catcher vessel to deliver to the mothership of its choice, rather than be required to participate in the non co-op fishery, if the mothership to which it is obligated withdraws from the fishery without the establishment of a mutual agreement. In the event of such an occurrence, the tie to the departing mothership would be broken a new tie established between the catcher vessel and the mothership to which the catcher vessel chose to deliver.

5. Initial Allocation of Quota Shares

The majority of the GAP supports an initial allocation to harvesters of 100% of the quota shares (11 in favor, 3 against and 2 abstentions). Further the GAP believes that the initial allocation formula for permits should include an equal sharing element and the allocation of incidentally caught overfished species be based on history or bycatch rates applies to quota share allocations using permit specific logbook information.

The GAP believes that the majority and minority view rationale will be well expressed through the public comment process.

6. Accumulation Limits

The GAP had a lengthy discussion regarding accumulation limits. And while we agree and recommend that the program contain accumulation limits, we are not prepared with the information we currently have, to make recommendations on percentage amounts for individual species. The GAP does recommend that the vessel limit and the individual control limit should be set equally. There was strong support for setting the limits in a fashion that did not negatively impact fishermen forcing them to divest quota shares. However there was also a discussion about how we want the fleet to look in the future with regards to consolidation. The choice of accumulation limits will be paramount to accomplishing the future fleet structure.

7. Area management / regional management zones. GAC Recommendation

The GAP believes that if there is a biological need that should be addressed through area management that it should be included in the program. We are not in favor of regional management zones.

8. Gear Switching

The GAP recommends gear switching be allowed in the trawl rationalization program with minimum constraints on fishermen. We are not supportive of permanent gear conversion now or in the future under this program.

9. Length Endorsements

The GAP is undecided on this issue and believes more analysis is necessary in order to make an informed recommendation on this issue. The GAP would like the Council to clarify their intention of whether this would apply to all limited entry permits held in each sector and the GAP believes that all permits should be treated the same.

10. Annual Whiting Rollovers

We recommend the Council adopt Option 2 (status quo) as the final preferred alternative. The Council identified Option 1 (no rollovers) as the preferred preliminary alternative (PPA) under B-1.2. The primary reason for including Option 1 in the PPA was the belief that with

rationalization of the whiting fishery there would never again be any unharvested whiting. However, Appendix B clearly states: “If a rollover mechanism is not established, harvestable amounts of the whiting OY are likely to be foregone, resulting in less revenue than would otherwise be the case.” The analysis also suggests Option 1 may harm the fishery; that is, “Not allowing a rollover may mean that the available harvest is not realized in some years, potentially reducing economic activity.” That is, the analysis shows that Option 1 could prevent attainment of the annual whiting OY and reduce economic benefits from the fishery. In contrast, there are no problems identified in the analysis with the status quo process for rollovers of unharvested whiting from one sector to another. Therefore, the GAP recommends maintaining the status quo discretionary authority that facilitates attainment of the whiting OY.

11. Program duration and modification

The GAP believes that the program should be reviewed periodically but that no sunset clause should be included with the program.

12. Adaptive Management

A majority of the GAP (10 in support, 7 against) recommends a set-aside of up to two percent of quota shares be set aside for adaptive management. The adaptive management must be more clearly defined and should only be used for those specific purposes which address unintended consequences of implementing the program. The adaptive management program should not be used to develop new fisheries or reallocate fish away from the trawl sector. The GAP believes that 10 percent of the quota share for adaptive management is excessive and equates to a significant amount of quota pounds that will negatively impact trawlers. If the set aside is not utilized then it should be returned to the fishermen.

PFMC
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