

## GROUND FISH MANAGEMENT TEAM REPORT ON FISHING IN MULTIPLE INDIVIDUAL FISHING QUOTA MANAGEMENT AREAS

At its March 2016 meeting, under Agenda Item G.8, the Council chose a final preferred alternative (FPA) on all aspects of Changes to Trawl Catch Share Program Gear Regulations issue, with the exception of “Fishing in Multiple Individual Fishing Quota (IFQ) Areas”. The Council motion removed this issue from the FPA and scheduled it for consideration at this meeting. The Groundfish Management Team (GMT) reviewed this issue and offers the following comments.

There are a series of decision points that need to be considered by the Council when making recommendations under this Agenda Item:

1. Should fishing be allowed in multiple IFQ management areas on the same trip?
2. If yes, then should catch be sorted by IFQ management areas or can it be mixed?
3. If catch is allowed to be mixed, then how should catch be assigned to IFQ management areas for the purposes of catch accounting?

In general, the GMT supports allowing IFQ participants to fish multiple management areas on the same trip. While this action primarily affects California based participants at the current time (i.e., Washington and Oregon IFQ participants primarily fish above the IFQ management line at 40°10' N. latitude), new IFQ management areas could arise in the future (e.g., if the Council decided to set area-specific harvest specifications at the Columbia River). Allowing IFQ participants to fish multiple management areas on the same trip would likely enable some of the IFQ program objectives such as greater efficiency, flexibility, and better ability to obtain optimal yields of target stocks.

Regarding the requirement of sorting by management area, the GMT recognizes that sorting could be logistically or economically challenging, and difficult to enforce. Small vessel owners may not have sufficient storage capacity for multiple sorting bins, and adding storage holds to larger vessels may not be economically viable. In regards to enforcement challenges, the West Coast Groundfish Observer Program (WCGOP) informed the GMT (via personal communication) that if fish were stowed in separate holds below deck, it would be difficult, if not impossible, for observers or electronic monitoring systems to ensure that swapping does not occur below deck. In addition, the requirement to keep fish separate presents problems for the catch monitor program during offload, as it likely not possible to monitor the hold, offload, scales, etc. simultaneously throughout the landing to ensure catches are not mixed at any point.

Accordingly, the GMT supports mixing of catch (Alternative 3) and describes the pros and cons for each of three catch accounting options below. The GMT emphasizes the importance of accurate catch accounting by management area as it is used in inseason quota management (i.e., to IFQ accounts, sector allocations, and ACLs) and for influential stock assessment catch streams (e.g., removals and indices of abundance).

### **Alt 3 - Option 1: “Conservative” (deducted from the area of lowest quota)**

Given the multitude of IFQ species, Option 1 could be the most complex for data processing and catch accounting, and may not be economically viable for IFQ participants. For example, a vessel may have to purchase additional quota pounds (QP) in areas that they may not have much catch history.

### **Alt 3 - Option 2: “Pro rata” (partitioned to area based on relative effort)**

Option 2 appears to be the most accurate for catch accounting by area, and less complex than Option 1 for data processing and catch accounting. However, catch is not always related to effort (e.g., 90 percent of catch could come from 10 percent of hauls), and the pro rata approach could become increasingly complex at finer scales (e.g., percentage of haul time north and south of a management line as opposed to number of hauls per location).

### **Alt 3 - Option 3: “Port of landing” (all attributed to area containing the port of landing)**

Option 3 would be the simplest method for catch accounting. However, this option could potentially be less accurate for proper catch accounting by area, as catch could be exported from one area to another. This ability to export catch from one area to another could create incentives to use port of landing as a mechanism to prevent overages. For example, if one were to have a “lighting strike” of Pacific ocean perch (POP) north of 40°10' N. latitude, one could travel south, deploy a set (to meet the multiple IFQ area reporting standards), and then land the combined catch into a port south of 40°10' N. latitude where POP is part of the southern slope rockfish complex. It should be noted that the southern slope rockfish complex has low attainment rates and accessible open market quota. To reduce this incentive, when fishing multiple areas on the same trip, the Council could consider whether all set hauls should occur within a certain number of miles of the management line (developed with assistance from industry). Though, it is possible that the regulatory language needed to discourage such activity may quickly become unduly burdensome and complex.

## **Recommendation**

**The GMT recommends the Council consider Alternative G3, Option 2 to allow vessels to fish in multiple IFQ management areas on the same trip, allow the mixing of their catch, upon which the mixed catch would be partitioned to each management area based on pro rata effort.** However, the GMT notes that there may be difficulties defining the method by which to apportion. For example, whether catch is apportioned by durations of tow or by the number of tows in a given area, catch is not always evenly distributed among or within tows. Further, the electronic ticket (e-ticket) system would need to be modified to accommodate whatever apportionment method is selected. To this end, the exact pro-rata method to apportion catch across multiple catch areas may need input from multiple sources, which may include but not be limited to the GMT, the observer program, and Pacific States Marine Fishery Commission staff responsible for the e-ticket interface.