Agenda Item F.2.d Supplemental Public Comment PowerPoint 2 (Pacific Seafood) June 2017



### Trawl Catch Shares Review Draft Report

Agenda Item F.2

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## A-20 FEIS – Goal and Objectives The primary stated goal of Amendment 20 is:

 "Create and implement a capacity rationalization plan that increases net economic benefits, creates individual economic stability, <u>provides for full</u> <u>utilization of the trawl sector allocation</u>, considers environmental impacts, and achieves individual accountability of catch and bycatch."

#### Additional stated objectives of Amendment 20 include:

- (#2)"provide for a viable, profitable, and efficient groundfish fishery,"
- (#4) "Increase operational flexibility,"
- (#5) "minimize adverse effects . . . on fishing communities," and
- (#6) to "promote measurable economic and employment benefits through the seafood catching, processing, distribution elements, and support sectors of the industry."

# The largest success in Pacific's opinion:

The rebound of over fished stocks

# The largest failing in Pacific's opinion:

 The program was not structured to be a <u>"food source-supply</u> chain to market platform"

# Circular Diagram

(Figure 3-39).

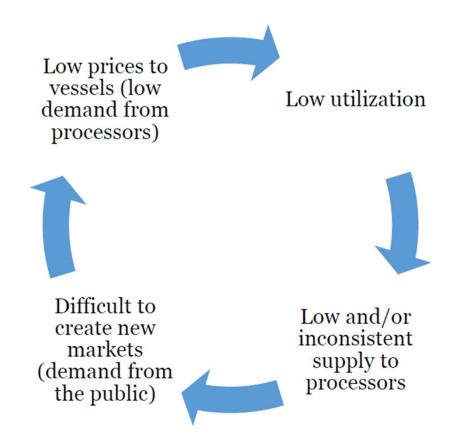


Figure 3-39. Illustration of cycle of low demand and low utilization.

Table 3-42. Measures of net revenue (2015 \$) by year and averaged by pre- and catch share periods for **non-whiting processors** participating in the West Coast Catch Share Program. Source: EDC data.

Non-whiting processors									
Total cost net revenue	2009	2010	Pre-catch share avg.	2011	2012	2013	2014	2015	Post- catch share avg.
Mean per processor	457,824	411,414	434,619	537,778	328,448	86,845	26,361	75,562	210,999
Standard deviation	1,043,332	931,306		847,189	947,877	922,833	1,142,794	370,241	
Median per processor	-17,442	4,652	-6,395	126,768	39,990	1,881	-24,902	32,768	35,301
Mean per mt	-148	605	229	660	177	-520	-725	-78	-97
Median per mt	-38	129	45	827	651	52	-22	45	311
Variable cost net revenue									
Mean per processor	632,127	519,880	576,004	708,595	467,244	256,753	216,309	220,670	373,914
Standard deviation	1,055,516	968,507		970,369	1,015,375	1,070,436	1,183,961	432,934	
Median per processor	90,376	38,408	64,392	158,960	49,719	20,465	71,392	186,254	97,358
Mean per mt	588	963	775	1,040	513	-179	-277	312	282
Median per mt	491	334	413	995	877	157	157	449	527

# "Provide for Full utilization of the trawl sector allocation"

#### WC Groundfish Trawl CS Program Review Table 3-72 Page 190:

- "Actual utilization of Dover sole was 13.1% and the pounds of estimated potential utilization with no fixed gear were 16.2% to 23.5%..."
- "Similar patterns are calculated for longspine and shortspine thornyheads..."
- This dover increase would be 23.7% to 79.4% higher than the landed dover tonnage in 2015
- Each 1%, is approximately 1 million pounds and represents an estimated 15 to 20 working days for 40-55 employees in a typical non-whiting fillet operation
- Additive to revenues and jobs are projected increases in Thornyheads: Longspine 23% to 32% shortspine 42 to 49%: Insert table in PP

## **Accumulation Limits**

NMFS Informational Report I Nov 2015: Draft Guidance for Conducting Review of Catch Share Programs: Page 10: Section VI:

#### **Describing and Analyzing Program Performance:**

"If a program component is required, or must be considered under MSA or the CS Policy says it should be evaluated, <u>it should</u> <u>be addressed in the 5/7 year Review...The following components meet one of more of these criteria....F) accumulation <u>limits/caps</u>"....</u>

## Mr. Merrick Burden Public Comment May 24<sup>th</sup>-25<sup>th</sup> SSC Economic Subcommittee Meeting

- Asked if we should "<u>reset the clock</u>" and test the assumptions upon which were the basis for the present accumulation limits.
- Pacific believes that vessel caps are too restrictive, and that the Aggregate cap strands underutilized species
- It is a fair question why we even need caps for some species when utilization rates are as low as they are

## AMP Pass Through of Quota Pounds to Processors

Supplemental CAB Report PFMC June 2017\* - Shoreside Processor Representatives (page 6):

- This is intended to secure processor operations and investments and to equalize deliveries and reduce lapses.
- This could be done with a number of sideboards (e.g. no cost to vessels. Localized delivery requirement, etc.)

<sup>\*</sup> http://www.pcouncil.org/wp-content/uploads/2017/06/F2c\_Sup\_CAB\_Rpt\_Jun2017BB.pdf



# THANK YOU