GROUNDFISH MANAGEMENT TEAM REPORT ON
THE NATIONAL MARINE FISHERIES SERVICE REPORT

The Groundfish Management Team (GMT) reviewed the National Marine Fisheries Service (NMFS) report on updates of confidentiality of certain state and Pacific Fishery Information Network data (Agenda Item H.1.a, Supplemental NMFS Report 3).

The GMT would like to express our concern that the ability to use available data for management depends on the interpretation of confidentiality rules. Being able to report catch at management-relevant levels is essential to the work of the GMT and the Pacific Fisheries Management Council. An overly conservative interpretation of the "rule of three" could make data needed to inform management unavailable for decision-making.

To date, groups have interpreted confidentiality rules differently. Some entities have considered all catch within a stratum (combination of fishery, area, year, etc.) that include three active buyers and vessels as non-confidential. However, others consider catch of species non-confidential only in those cases when a given stratum includes three or more active vessels and buyers *and* the given species was caught by three or more vessels within the stratum. Making these rules consistent across entities could result in the inability to report all catch, make available data inconsistent between strata, and could result in difficulties in trend analysis and comparisons.

Additionally, the GMT and state data managers are concerned about strictly applying the rule of three in cases when data from an entire state or region would be deemed confidential. For example, there are often only one or two buyers of shoreside whiting in Washington. In order to display these data, managers must use multiple years or include ports such as Astoria. Aggregating the data to meet the rule of three results in a loss of detail to inform decision making. However, the GMT notes that there may be situations where state regulations dictate how the rule of three should be used.

PFMC
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