

ALLOCATION REVIEW PROCEDURES – PRELIMINARY

One of the major topics discussed at Managing Our Nations Fisheries III (MONF), held in Washington D.C. in 2013 and hosted by our Council, was review of intersector allocations. In 2016, National Marine Fisheries Service (NMFS) published three directives on allocation reviews:

- **Policy Directive** 01-119: Fisheries Allocation Review Policy (Agenda Item D.4, Attachment 1)
- **Procedural Directive** 01-119-01: Criteria for Initiating Fisheries Allocation Reviews (Council Coordinating Committee Allocation Workgroup Guidance Document) (Agenda Item D.4, Attachment 2)
- **Procedural Directive** 01-119-02: Recommended Practices and Factors to Consider When Reviewing and Making Allocation Decisions (Agenda Item D.4, Attachment 3)

Policy Directive 01-119 was updated on February 23, 2017. The policy directive identified Councils as the authority responsible for specifying criteria that will trigger consideration of allocation reviews for each of its fishery management plans (FMPs) and directed that the “triggers should be identified within three years [by 2019] (or as soon as practicable) from finalization of this policy” (01-119, p. 2). The Policy Directive also identified that the Council Coordinating Committee had developed guidance on when review of allocations would be triggered (Procedural Directive 01-119-01) and NMFS had developed guidance on the factors to be considered in allocation reviews (Procedural Directive 01-119-02).

The purpose of these policies and directives is to “provide a mechanism to ensure fisheries allocations are periodically evaluated to remain relevant to current conditions” based on an adaptive management philosophy: “Adaptive Management is the on-going process of evaluating if management objectives have been met and adjusting management strategies in response” (01-119, p. 2). At the same time:

These guidance documents do not modify or supersede any guidance associated with the National Standards, other provisions of the Magnuson-Stevens Fishery Conservation and Management Act (MSA) or other applicable laws; rather, they are intended to help the Councils and NOAA review and update allocations under the MSA. (01-119, p. 1)

The procedural directives are implemented in a three step process, the first two steps of which are the subjective of Procedural Directive 01-119-01. The first step occurs when criteria are met that trigger the review, and the second step is the review to determine whether development of new allocation options are or are not warranted. The second step does not require an in depth analysis but should be adequate to inform a determination of the need for of new allocation alternatives. The third step is the process of formal consideration and analysis of new alternatives and should be guided by Procedural Directive 01-119-02. It may also include updating FMP objectives.

The scope of allocations covered by these policy and procedural directives are those that “distribute *specific quantities* to identifiable, discrete user groups or individuals regardless of how the discrete user groups are identified in the FMP (emphasis added, 01-119, p. 4). This definition is somewhat narrower than that generally used for allocation considerations related to National Standard 4, which identify allocation of opportunities to participate, rather than quantities of fish.

The task before the Council at this meeting is to preliminarily identify trigger criteria for allocation reviews, covering the first step in the three step process. Procedural Directive 01-119-01 identifies three general types of triggers: public interest based, time based, and indicator based (see pages 7-15, Agenda Item D.4, Attachment 2). A list of allocations related to Council FMPs and Pacific halibut along with draft criteria are provided for Council consideration in draft Council Operating Procedure (COP) 27 (Agenda Item D.4, Attachment 4). The Council should complete this work by its June 2019 meeting in order to meet the three-year deadline specified in the policy directive.

Council Action:

Preliminary identification of criteria for triggering an allocation review.

Reference Materials:

1. Agenda Item D.4, Attachment 1: Policy Directive 01-119: Fisheries Allocation Review Policy.
2. Agenda Item D.4, Attachment 2: Procedural Directive 01-119-01: Criteria for Initiating Fisheries Allocation Reviews (Council Coordinating Committee Allocation Workgroup Guidance Document).
3. Agenda Item D.4, Attachment 3: Procedural Directive 01-119-02: Recommended Practices and Factors to Consider When Reviewing and Making Allocation Decisions.
4. Agenda Item D.4, Attachment 4: Draft Council Operating Procedure 27, Process for Initiating Allocation Reviews.
5. If Received, Public Comments are Electronic Only ([see e-portal](#)).

Agenda Order:

- D.4 Allocation Review Procedures – Preliminary Jim Seger
- a. Reports and Comments of Management Entities and Advisory Bodies
 - b. Public Comment
 - c. **Council Action:** Preliminary Identification of Criteria for Triggering an Allocation Review

PFMC
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