COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON ALLOCATION REVIEW PROCEDURES-PRELIMINARY

The Coastal Pelagic Species Advisory Subpanel (CPSAS) heard a report from Dr. Jim Seger on Allocation Review Procedures, a review of intersector allocations. We would like to thank Dr. Seger for an informative and well-delivered presentation.

The majority of the material in the report and four attachments appear to center on procedural aspects that are represented to achieve greater clarity in the selection of criteria and the process of how and when the councils shall handle allocation amongst sectors. There is one quote that caught the panel's attention in the first paragraph on page two of the Situation Summary:

"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 Council may also wish to consider regulations passed for non-allocative purposes. An infrequent number of these may have imbedded allocative components. As allocation is a prescribed process foundational to our fisheries, we advise that regulations not specific to allocation need to be evaluated for potential effect on previously existing allocative relationships and downstream impacts in the fishery supply chain. We believe this would be limited in scope and in most cases advisory panels could provide input to help the evaluative process.

In addition, the CPSAS notes that Table 1 in Agenda Item D.4, Attachment 4 should be updated to reflect the fact that the live bait fishery now has required reporting, thereby allowing in-season monitoring of CPS live bait landings.

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