GROUNDFISH ADVISORY SUBPANEL REPORT ON ALLOCATION REVIEW PROCEDURES

The Groundfish Advisory Subpanel (GAP) received an overview of this issue from Dr. Jim Seger. The GAP offers the following comments and recommendations.

The GAP previously addressed this issue in April and we continue to support our April recommendations. Most importantly, the GAP reiterates that allocation, and in particular reallocation, is a serious matter that should not be taken lightly. It can be divisive and can upset established conditions that extend from the dock to end markets. The GAP supports the established groundfish allocations and believes that the Council already addresses reallocation effectively. Moreover, the current allocations generally provide important stability to fishery sectors.

The GAP thanks the Council for its work on this issue, and in particular for adopting a number of the GAP's April recommendations into the revised Council Operating Procedure (COP) 27.

Referencing the table in <u>Draft Council Operating Procedure 27</u> under this agenda item, the GAP reaffirms its recommendations from our <u>April 2019 statement</u>.

The GAP continues to think that set asides do not fit neatly into the definition of allocation, and would prefer to see set asides removed from Table 1 in COP 27. The GAP notes that set asides are already reviewed every two years as part of the biennial specifications process. If set asides remain in Table 1, the GAP wants to ensure that the current procedure for establishing set asides not be modified.

PFMC 06/21/19