Comments on Anchovy Management

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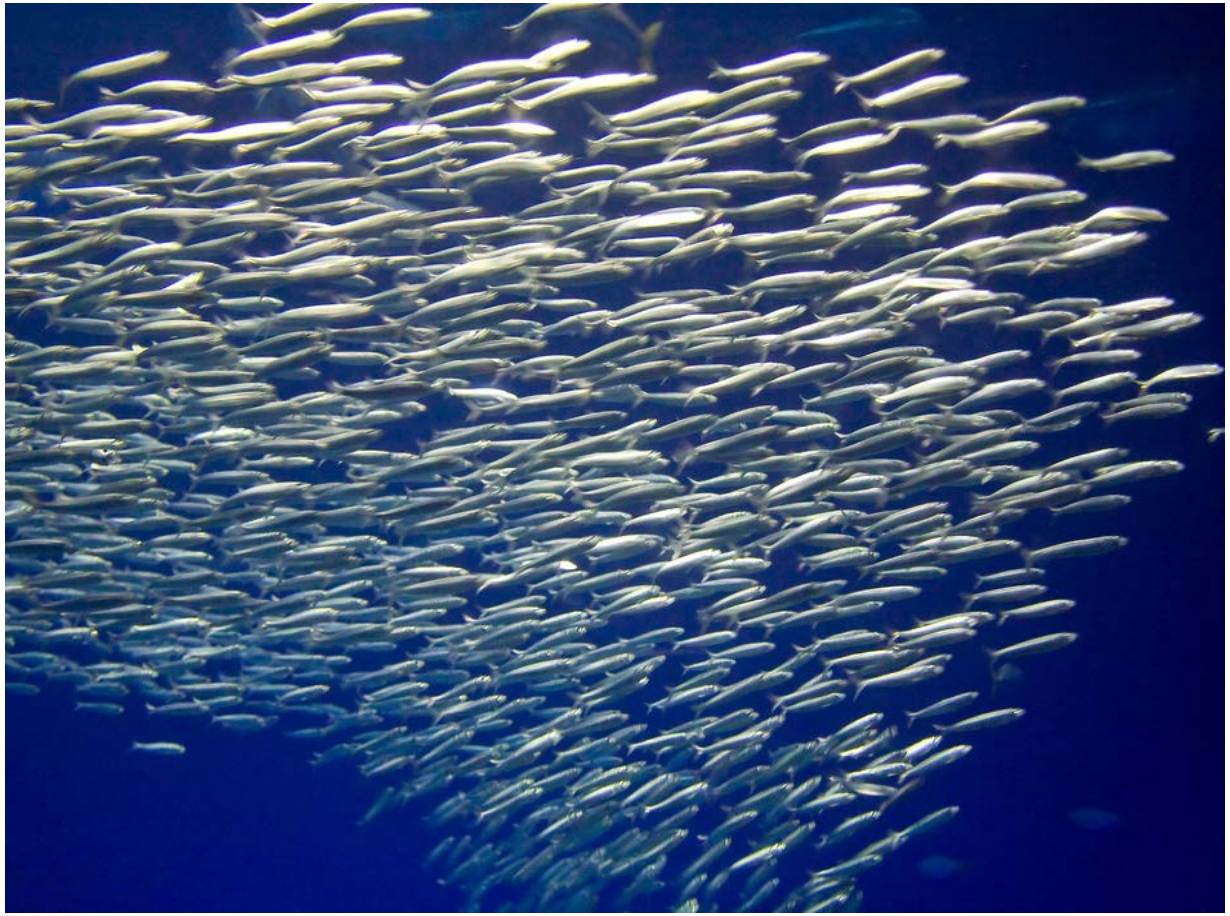
PFMC Agenda Item D.4

Oceana



Primary concerns regarding anchovy OFL and ABC:

Static catch limits don’t prevent overfishing during times of low abundance

OFL and ABC not based on best available estimates of current abundance

Constant Catch Approach

- Catch limits set at constant levels do not prevent overfishing

October 2019 Joint Meeting Report looked at constant catch ranging from 5,000-25,000 mt:

"*constant catch scenarios tended to lead to stock collapse in many simulations… confirms intuitive result in April 2019 white paper*"

SSC Recommendation (April 2018)

- In the near-term, the results of the ATM survey (either the most recent estimate or an average of the 2016 and 2017 estimates) could be used to set an OFL by multiplying the biomass estimate by an estimate of F_{MSY} (expressed as a proportion).

Comments on CPSMT/SSC October Workshop-Proposed Framework

- Support
  - Use of annual ATM survey results including nearshore estimates
  - Regular scheduled consideration of recent stock estimates
  - ABC reduced whenever recent estimates below threshold trigger

- Concerns
  - OFL based only on long-term biomass; does not necessarily reflect recent abundance or respond to collapse
  - Triggers need to require action; can’t be discretionary

Shortcomings of CPS FMP

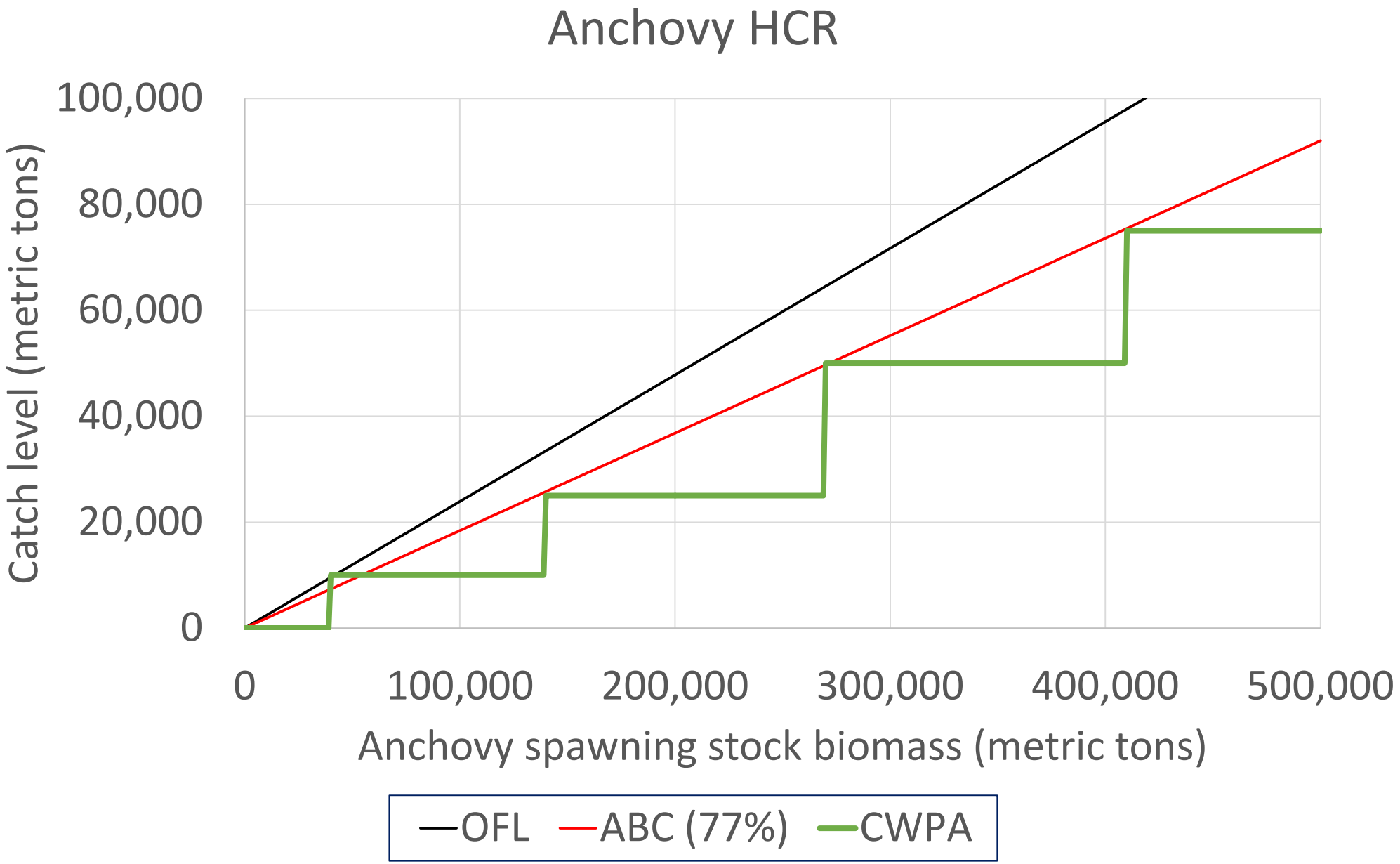
- Proposed framework would be a fundamentally different management approach than status quo
- Current CPS FMP does not require any periodic updates to OFL or ABC for CSNA and other ‘monitored stocks’
- No clear biomass triggers for management response are specified

Elements to Include in CPS FMP amendment

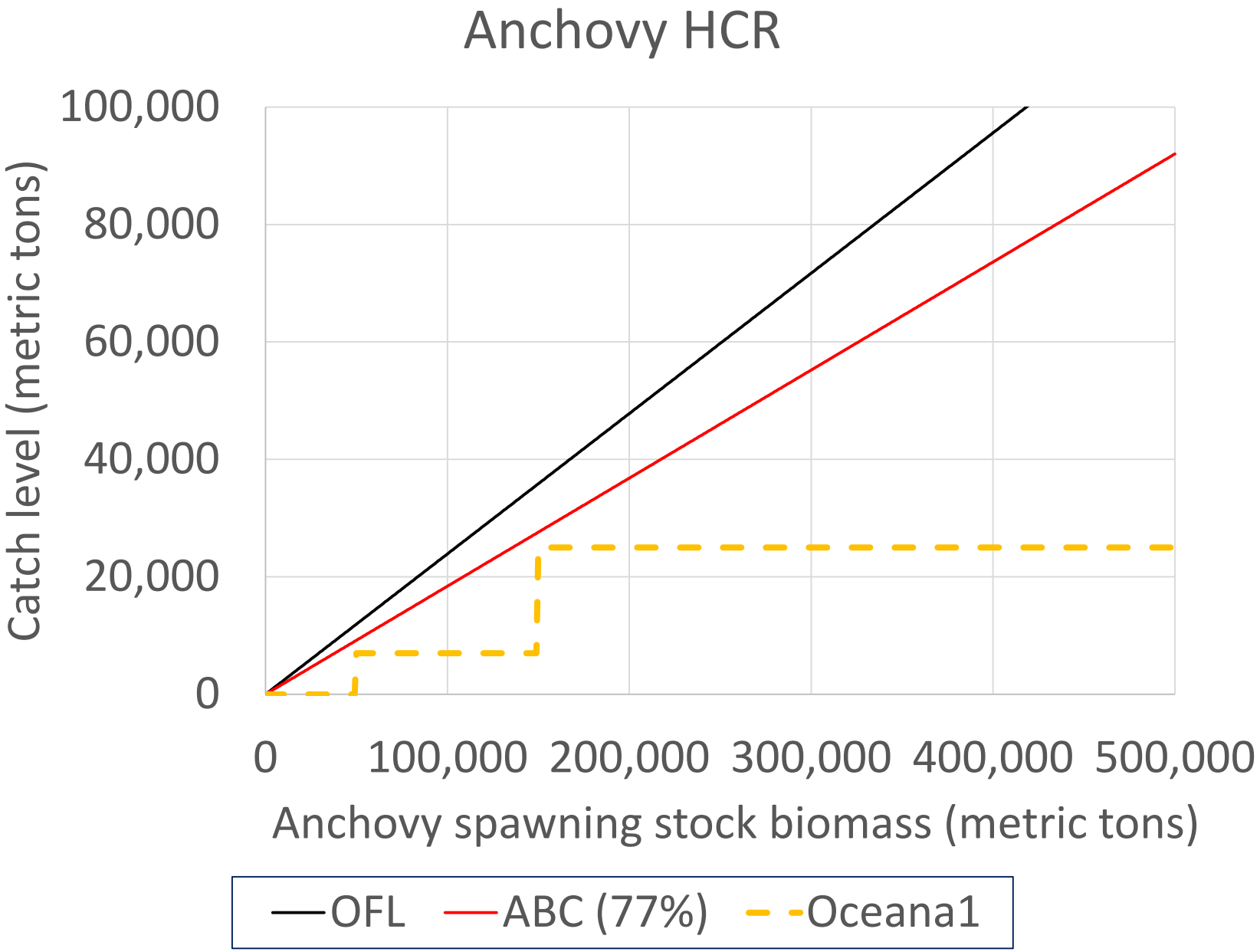
- Adopt new framework in the upcoming amendment to CPS FMP
  - Define short term biomass as most recent one or two years
  - OFL and ABC reduce if stock below triggers
- Establish an annual specifications process for all CPS stocks
- New ACL formula for CSNA
- Updated Minimum Stock Size Thresholds

Stepwise ACL Harvest Control Rules

- Maintain stable catch limits over wide ranges in biomass
- Reduce catch limits to prevent overfishing when stock is low
- Keep precautionary catch when stock is healthy
- Provide adequate forage



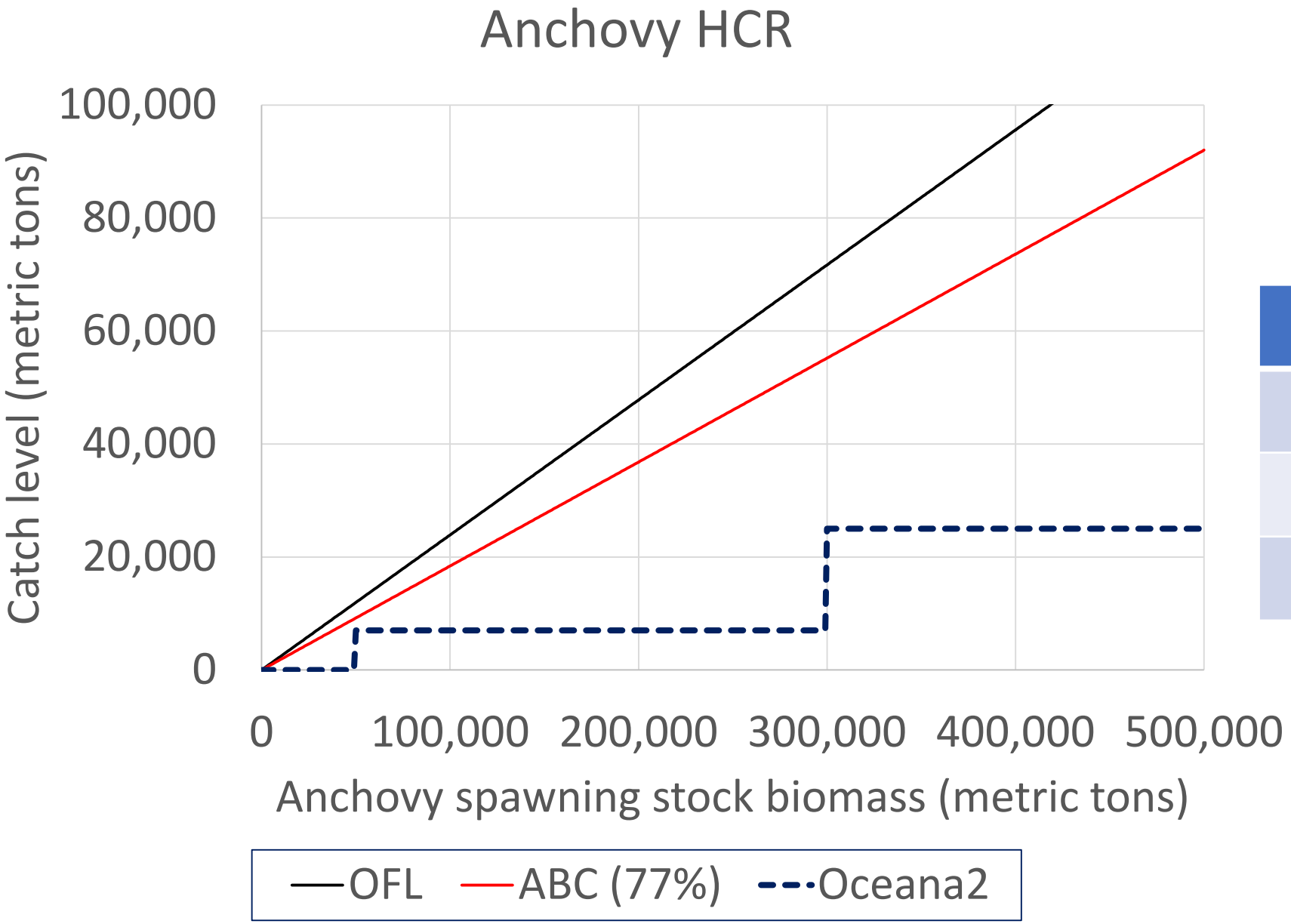
CWPA Proposed HCR from April 2019 PFMC Comments
https://www.pcouncil.org/wp-content/uploads/2019/04/E4b_Supp_PubPresentation1_CWPA__The-Case-for-Anchovy-Mgmt_Pleschner-Steele_APR2019BB.pdf



Option 1

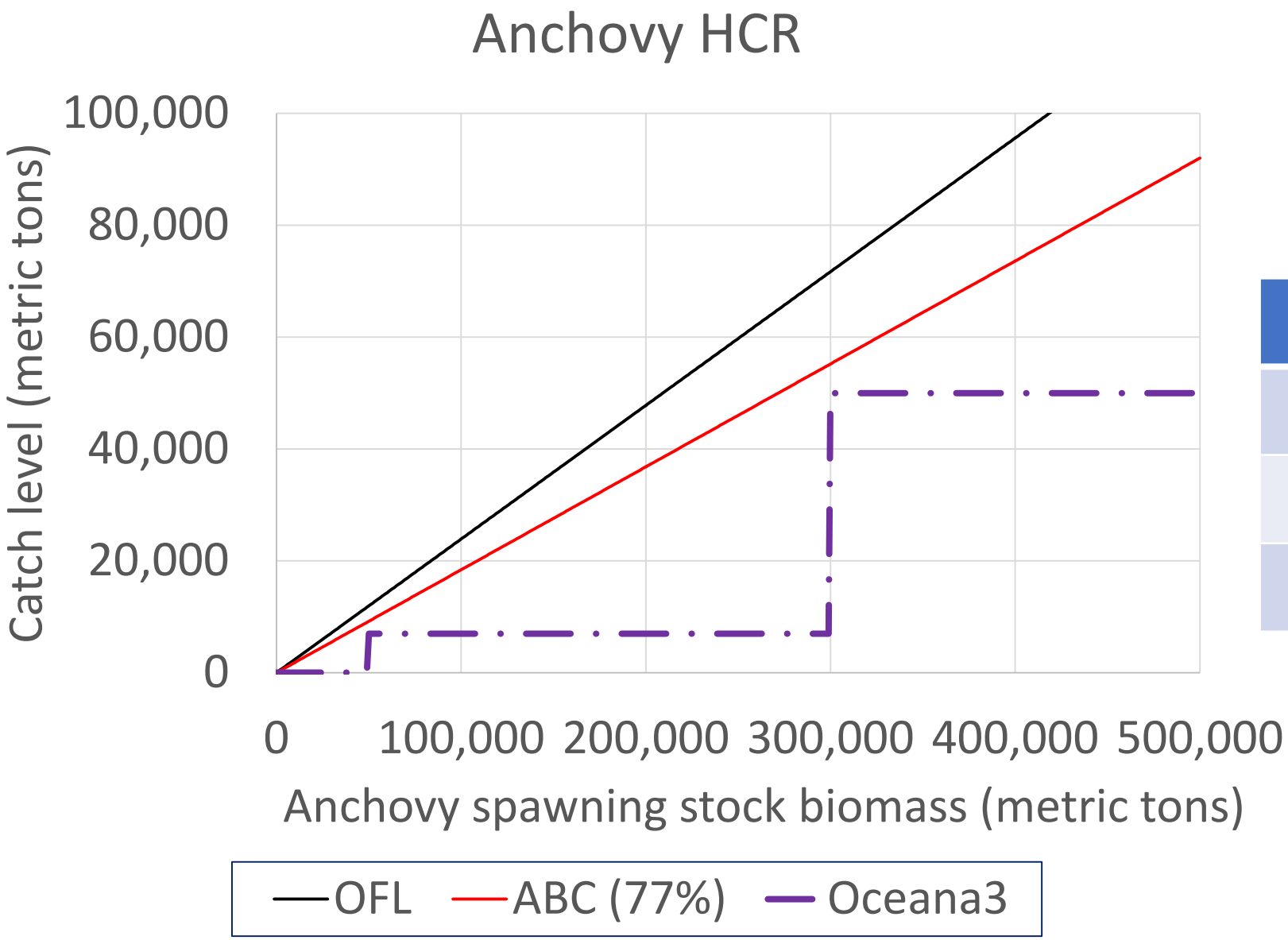
SSB (mt)	ACL (mt)
< 50,000	0
50,000-150,000	7,000
> 150,000	25,000

Option 2



SSB (mt)	ACL (mt)
< 50,000	0
50,000-300,000	7,000
> 300,000	25,000

Option 3



SSB (mt)	ACL (mt)
< 50,000	0
50,000-300,000	7,000
> 150,000	50,000

Request basic analysis of alternative ACL control rules

- Analyze alternatives based on:
  - Spawning stock biomass (SSB)
  - Anchovy catch
  - Proportion of years where SSB is below 100,000 mt
  - Proportion of years where catch is less than 25,000 mt.
  - Proportion of years in each Tier (for the tier-based rules).
  - Proportion of years where the fishery is closed.

Summary of Requests for Upcoming CPS FMP amendment

- Adopt new CSNA OFL/ABC framework with annual specifications
- Analyze alternatives and adopt a new ACL control rule in CPS FMP
- Establish/update MSSTs for all CPS