

OVERVIEW: OTHER ALTERNATIVE 2 ISSUES

The following topics have been identified for Sablefish Management and Trawl Allocation Attainment Committee (Committee) discussion under this agenda item.

- a. Gear Switching Limit Size When Permits Are Combined:** This issue is identified in footnote 13 of the alternatives package, as pertaining to Endorsement Limit Option 1. Staff has assumed that the Committee would not want to consider increasing the gear-switching limit size under Endorsement Limit Option 2, but that could be considered if the Committee so desired. The following is excerpted from the alternatives document and footnote 13:

Trawl permits with gear-switching endorsements. The annual sablefish north gear-switching limit for a gear-switching endorsed permits is:

Endorsement Limit Option 1: for each qualifying permit, the average percentage of the sablefish north trawl allocation caught with fixed gear for years fished between 2011 and the control date.¹³

Endorsement Limit Option 2: the standard northern sablefish vessel QP limit (the current limit is 4.5 percent but this could change in the future).

Footnote 13: With respect to Endorsement Limit Option 1, if two gear-switching endorsed permits are combined to increase the endorsed length of the permit, should the individual permit gear-switching limit be combined on the resulting permit, only the larger limit apply (applicable for endorsement limit option 1), or should some other option be considered. If a combination approach is used and the combination results in an amount greater than the annual vessel limit, should the maximum gear-switching limit also be capped at 4.5 percent? If the permit limit is allowed to be greater than 4.5 percent, in order to access the full limit, the permit would have to be moved between vessels. An assumption here is that for Endorsement Limit Option 2, the 4.5 percent limit applies to the permit and since each permit has an identical limit, the combination of permits would still result in a 4.5 percent limit.

- b. Stacking and Dual Endorsed Permits:** This issue is identified in footnote 16 of the alternatives package. Neither current regulations nor the alternatives allow trawl permit stacking (the registration of multiple trawl endorsed permits on the same vessel). This prohibition on trawl permit stacking may present a challenge for vessels with dual endorsed permits (permits with gear endorsements for both trawl gear and one of the fixed gears). If a vessel with a dual endorsed permit does not receive a gear-switching endorsement to go with its trawl endorsement, unlike other vessels with a fixed gear permit, it could not then acquire a second trawl endorsed permit to be registered on the

vessel at the same time as its fixed gear permit (Figure 1). Its options would be to sell its dual endorsed permit and acquire separate fixed gear and trawl endorsed permits or acquire access to a gear-switched endorsed trawl permit and transfer the fixed gear and dual endorsed permits on-and-off the vessel as needed but subject to limits on the number of times a permit may be transferred to a vessel per year (once).¹ Based on preliminary analyses, the dual endorsed permits that have accumulated a significant amount of gear switching history and appear likely to qualify for an endorsement also tend to be vessels with fixed gear sablefish tier endorsements (Table 1. Those without gear-switching history, or history in an amount unlikely to qualify them, do not have fixed gear sablefish tier endorsements. Exact numbers are not being specified for confidentiality reasons.

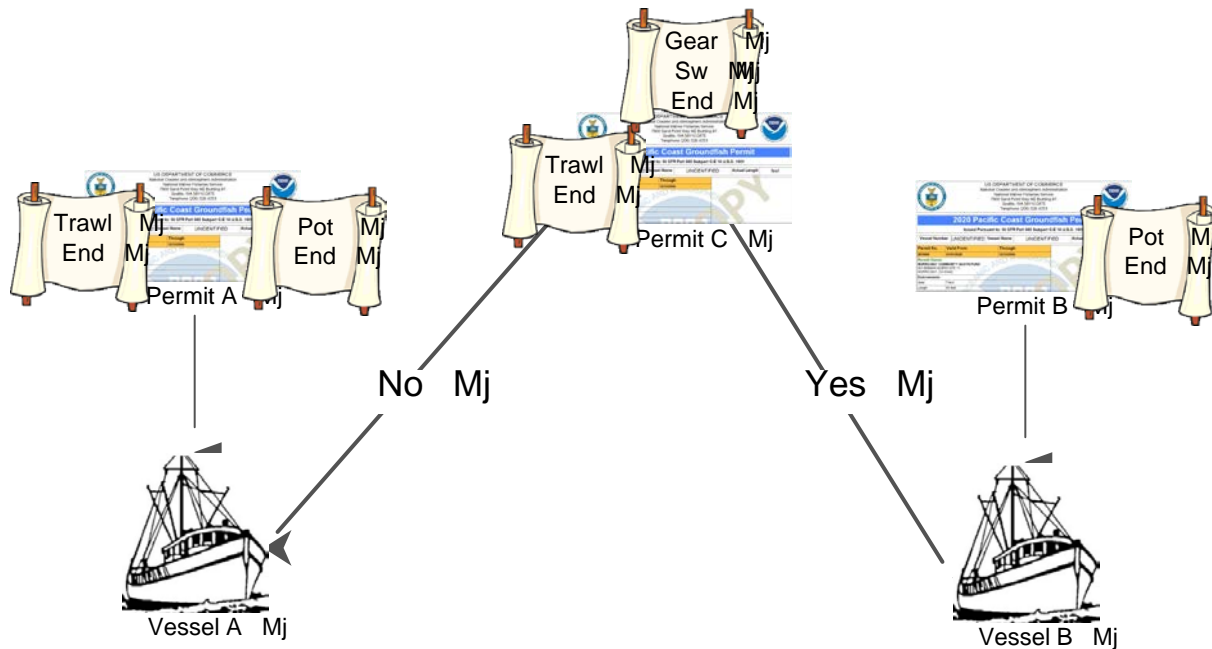


Figure 1. Vessel ability to register a gear switched endorsed permit depending on whether its fixed gear permit (pot or longline) is also dual endorsed for trawl gear.

Note: Vessel A, which has a permit with both a trawl and pot endorsement but no gear switching endorsement, cannot dual register with Permit C, which has a trawl endorsement and gear switching endorsement. While Vessel B, would be able to dual register both permits B and C but it would not involve having two trawl endorsed permits on the same vessel at the same time.

¹ A permit transfer from a vessel to “unidentified” status is not counted as a transfer but a transfer from “unidentified” status to a vessel does count against the one transfer limit.

Table 1. Status of gear switching history for the five dual gear endorsed permits (trawl/fixed gear combinations).

Status of the Five Dual Trawl -Fixed Gear Endorsed Permits	Permits Have Gear Switching History and Are Likely Qualify for a Gear Switching Endorsement	Permits Have No Gear Switching History or Are Unlikely to Qualify
Fixed Gear Sablefish Tier Endorsements	X	-
Fixed Gear Permits with No Sablefish Tier Endorsements	-	X

- c. Fishing Multiple Permits Sequentially on a Single Vessel:** This issue is identified in footnote 15 of the alternatives package. The issue originally came up with respect to trawl permits that would not receive gear switching endorsements but would be allowed to gear switch up to 0.5 percent of the trawl allocation. It was decided that to prevent a single permit (either an gear-switching endorsed or non-gear-switching endorsed permit) from being used to fish a gear switching limit on a number of different vessels that the limits would be specific to the permit. This is represented on the left side of Figure 2 (for a non-endorsed permit). The question was left open as to whether there was a concern that a vessel would line up leases for a number of trawl permits and fish the gear switching limits associated with each (represented on the right side of Figure 2 for a non-endorsed permits), while still being held to the annual vessel limit. One of the factors contributing to this concern is the relatively large number of latent or unused permits that might be made available to those interested in maintaining or increasing their level of gear switching (Figure 3).

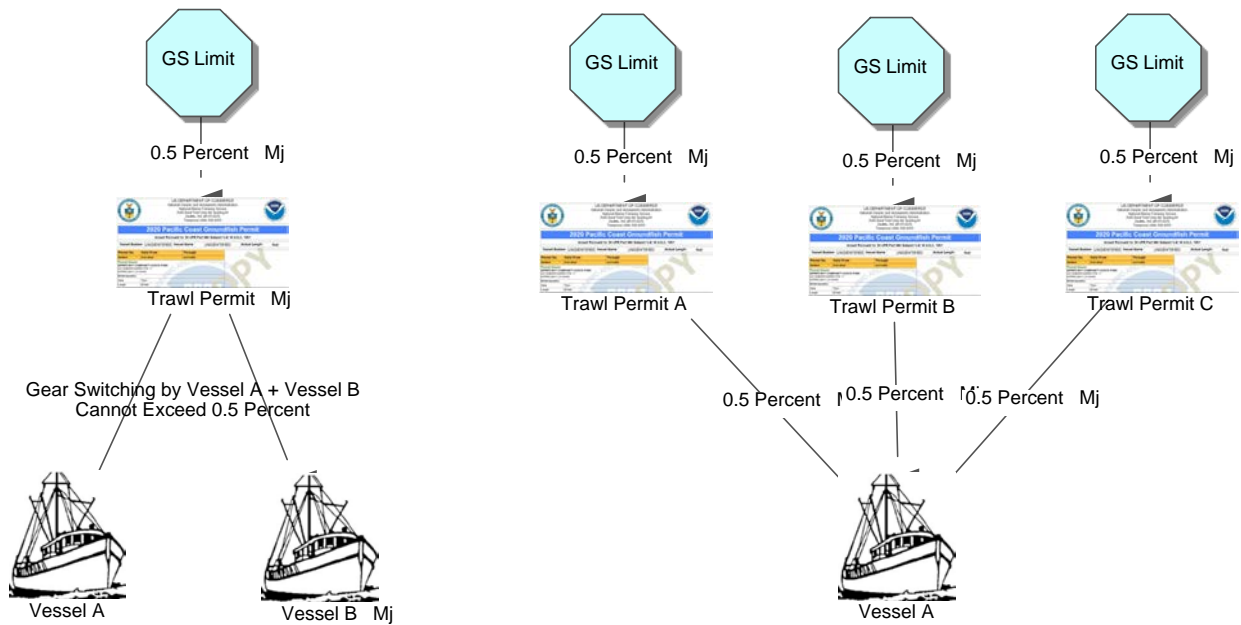


Figure 2. Gear switching limits as applied to permits and vessels (using non-gear-switching endorsed permits as an example).

Note: The Committee has decided that the gear switching limit would apply to the permit such that multiple vessels will not be able to harvest multiple gear switching limits (left side of figure). The Committee will be discussing whether or not to prevent a single vessel from fishing multiple permits (right side of figure).

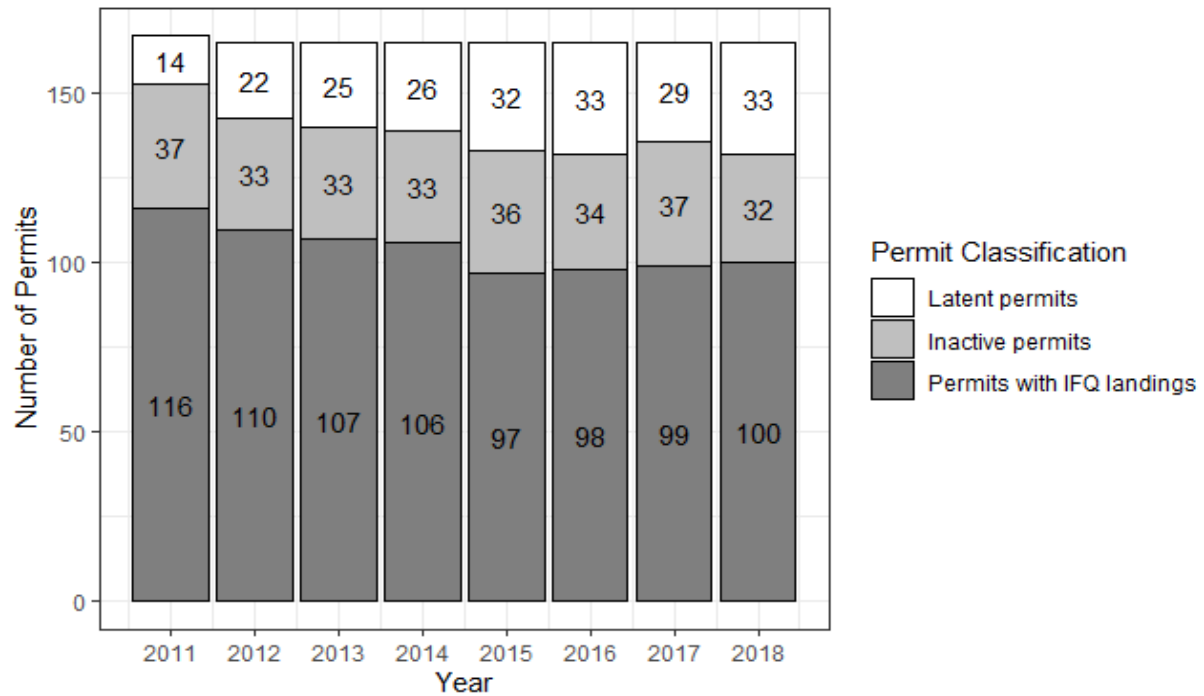


Figure 3. Number of trawl limited entry permits by classification (inactive for entire year, latent for entire year, or with IFQ landings), 2011-2018 (from page 12 of the [analysis provided for the Committee's January 2020 meeting](#)).