

GROUND FISH MANAGEMENT TEAM REPORT ON THE REQUEST FOR
MOTHERSHIP/CATCHER PROCESSOR EMERGENCY RULE

The Pacific Fishery Management Council (Council) added an emergency action agenda item on Monday, March 8 for the following day, Tuesday March 9, based on a request from industry under open public comment ([Agenda Item B.1.b](#)) to use emergency action to allow an at-sea processing platform to operate as both a mothership (MS) and catcher-processor (CP) during the same calendar year for 2021. A similar emergency rule was recommended by the Council and implemented by the National Marine Fisheries Service (NMFS) in 2020. Due to time constraints, the Groundfish Management Team (GMT) was unable to complete a thorough analysis of this emergency action request. However, the GMT provides the following thoughts for Council consideration.

The GMT notes that the timing associated with the 2021 emergency rule request differs from that of the 2020 request. Industry submitted the 2020 request during the April Council meeting, and the rule became effective June 19, 2020 ([85 FR 37027](#)). The timing in 2020 effectively eliminated the ability for CP vessels to operate as MS platforms before choosing to participate in the Alaska pollock B season which began on June 10, 2020. This year, because the process has begun in March rather than April, the 2021 emergency rule could be in effect earlier than June 19, thus ensuring that a vessel may choose to operate as a MS in the Spring and a CP in the Fall after returning from the Alaska pollock B season, or vice versa. This additional month of flexibility in the Spring could provide significant economic benefit to both sectors. As shown in Table 15 of the scoping document under the Mothership Utilization agenda item ([Agenda Item G.3, Attachment 1, March 2021](#)), *“during 2011-2020, an average of ~53 percent of the total whiting caught in the MS sector, 45 percent in the CP sector... was harvested in May and June.”* Additionally, the scoping document indicates that the proportion of annual catch occurring in May and June has mostly increased over recent years for both sectors. Similarly, Figure 1 below shows that the proportion of annual ex-vessel revenue captured prior to June 19 (the 2020 Emergency Rule effective date) has generally increased from 2016 to 2019; in 2020, this trend reversed and the proportion decreased by 13 percent in the MS sector and 2 percent in the CP sector. These decreases in 2020 likely reflect COVID-19 impacts, including a lack of processors available to catcher-vessels due to attempts to minimize potential COVID-19 spread. This emergency action could provide additional processing opportunities during this typically highly profitable time period. More generally, the highly unpredictable nature of harvest opportunities during a global pandemic means that more flexibility over the entirety of the season will allow industry the greatest ability to adapt and utilize their allocation.

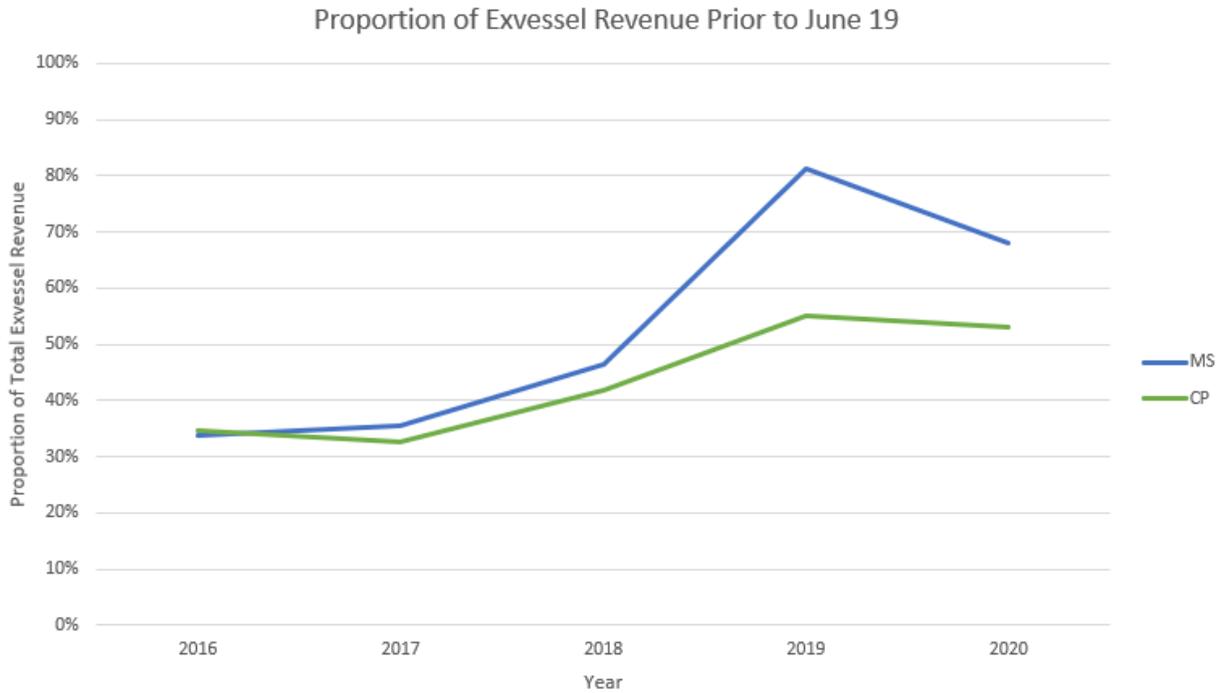


Figure 1. Proportion of annual ex-vessel revenue captured before June 19th for the years 2016-2020, by year and at-sea sector.

This emergency rule would be unlikely to result in the at-sea sector exceeding catch or bycatch limits, because the MS and CP sectors are both part of a Limited Access Privilege Program with a limited number of permits. Further, sectors would still be required to stay within their specified Pacific whiting allocations, which are designed to maintain removals at or below annual catch limits. Fishery impacts from these sectors were modeled as part of the [2021-2022 harvest specifications and management measure](#) process, and are published in the associated environmental assessment (EA). The GMT is unclear how many boats this rule would benefit, but we expect the impacts from this action would fall within the range of impacts considered in the EA analysis, which assumed full attainment of the Pacific whiting total allowable catch limit in these sectors. Additionally, this emergency rule would not change the management tools used to minimize bycatch, like season structure, or identify and address bycatch concerns in-season, such as 100 percent monitoring requirements or mitigation measures (e.g., Salmon Mitigation Plan). In addition, industry will continue to use co-ops to enforce self-management rules to avoid bycatch when and where possible.

The GMT sees merit in this emergency rule to add flexibility to the CP and MS sectors during the COVID-19 crisis, while also recognizing that this emergency rule does not benefit other groundfish sectors that have also been affected by the pandemic. Given this context, the Council should weigh the needs and potential benefits of this emergency rule against the workload trade-offs of other potential actions the Council and NMFS could take.