

GROUND FISH MANAGEMENT TEAM REPORT ON SABLEFISH GEAR SWITCHING

The Groundfish Management Team (GMT) received a presentation from Dr. Jim Seger and Ms. Jessi Doerpinghaus (Pacific Fishery Management Council [Council] staff), reviewed documents and public comments in the briefing book, and offers the following summary of considerations. The GMT understands that the Council's decisions under this item are largely policy-based. However, the GMT offers a recommendation relative to the first question posed in the Situation Summary, namely whether the Council wants the maximum 29 percent of gear switching to provide certainty or to be based on projections. In addition, we provide relevant previous recommendations and note the importance of incorporating uncertainty in future models and projections.

The Attachment 4 analysis and Situation Summary prompt the Council to consider whether their intent with the 29 percent maximum is either to have *certainty* that 29 percent will not be exceeded or to *project* that generally less than 29 percent of trawl northern sablefish allocation would be attained through gear switching ([Agenda Item C.5, Attachment 4, September 2021](#)). The GMT reminds the Council that the April 2021 motion on this item states that setting a 29 percent maximum is only “for the purpose of guiding the development of draft alternatives that would limit gear switching.” The initial recommendation to identify levels of gear switching for the purpose of analysis came from the GMT at the November 2020 meeting in which we stated, “The Council would then select a *target level* [emphasis added] of gear switching to inform adoption of the range of proposed alternatives at a subsequent meeting,” ([Agenda Item G.1.a, Supplemental GMT Report 1, November 2020](#)). The term *target*, in this case, could be considered synonymous with *projected*. While setting a gear switching limit with certainty, similar to a hard cap, may offer some certainty to buyers, the GMT considers this type of limit to be unnecessarily restrictive and may not allow otherwise qualified gear switchers to fish with fixed gear under their obtained quota pounds (QP) at status quo levels. Given the initial intent for a maximum limit on gear switching and recognizing that this, along with the other two questions listed in the Situation Summary, is ultimately up to the Council's discretion, **the GMT recommends the Council consider the Range of Alternatives (ROA) with the intent that the 29 percent maximum limit on gear switching would be a projection rather than a certainty.** The GMT urges the Council to address the other two listed questions in a manner that holistically considers all who will be impacted as this agenda item moves forward; in addition to fishery participants, this action will impact communities that rely on fisheries and sablefish markets as well as consumers of fishery products.

Previous GMT recommendations from [Supplemental GMT Report 1, November 2020](#) that are still applicable to the range of alternatives discussion include:

- “The GMT recommends the Council replace self-designation of gear-specific quota pounds (QP) under Alternative 1 with a provision in which [the vessel's] trawl landings are automatically debited from their trawl-only QP before debiting from the unrestricted QP.”
- “The conversion date analysis available to date does not indicate that there would be appreciable impacts on the availability of trawl gear quota or gear switching quota

(compared to the 2016-2019 average level of gear switching), and thus the GMT recommends eliminating the conversion date sub-option if Alternative 1 is included in the Range of Alternatives (ROA). Data show that gear switching landings are higher later in the year ([SaMTACC Agenda Item F, Attachment 1, May 2019, Chapter 7](#)). If this pattern persists, there may be less utility in converting trawl-only QP into unrestricted QP during the year.”

- “The GMT recommends proposal designers work with Council staff and the National Marine Fisheries Service (NMFS) to find ways in which to simplify Alternative 3 without compromising its intended purpose to attribute and cap gear switching levels for individual vessels based on their historical participation using either trawl or fixed gear to harvest sablefish.”

Finally, the GMT encourages the Council to take into account input provided from groundfish fishery stakeholders during meetings, climate scenario planning workshops, and other venues regarding increasing need for nimbleness in light of expected changes in the environment and markets ([Supplemental GMT Report, April 2021](#)). Given the great degree of uncertainty in the future behaviour of fleets and climate conditions as well as the lengthy process required to amend the Fishery Management Plan (FMP), the Council might want to consider actions that are more adaptable and do not require FMP amendments.

Methodologies used for projections in stock assessments, harvest specifications, or specific agenda analysis will need to be reviewed by the Scientific and Statistical Committee. At this time, we do not have specific input on the projection methods used in the Attachment 4 analysis to estimate likely gear switching outcomes but note that the GMT has started to discuss the challenges associated with using the past to project future conditions as we see continued impacts related to climate change and the COVID-19 pandemic. The GMT notes that broader discussion across FMPs and Council bodies will need to take place to truly understand how historical data can inform predictions about the future.

PFMC
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