

GROUND FISH MANAGEMENT TEAM REPORT ON SABLEFISH GEAR SWITCHING – CHECK-IN AND REFINE THE RANGE OF ALTERNATIVES

The Groundfish Management Team (GMT) reviewed the documents in the briefing book and received a briefing from Dr. Jim Seger and Ms. Jessi Doerpinghaus of Pacific Fishery Management Council (Council) staff. The GMT provides some thoughts about timing, possibilities for narrowing the focus of the current range of alternatives (ROA), and the potential addition of the 29 percent season cap. As the Council moves forward with this item and compares alternatives, the GMT encourages the Council to balance the goals and objectives of the trawl catch share program regarding efficiency, flexibility, minimizing ecological impacts, and safety.

The GMT supports the Council finding the most efficient timeline to get to the final preferred alternative (FPA). Although the analytical work on this issue is primarily done by Council staff, the GMT points out that the extent of our comments on the preliminary preferred alternative (PPA) and FPA selection may be affected by our workload on harvest specifications and management measures if the timeline is extended into March and/or April 2024.

The GMT discussed ways to reduce the analytical workload and was asked by analysts to help eliminate options if we could. The GMT notes that eliminating or ceasing further refinement of any of the alternatives is a Council “policy” call. However, the GMT recognizes that eliminating whole alternatives or options, or ceasing further development of any of the alternatives, will likely streamline workload for the Council process (including analysts) and narrow the primary focus of the Council’s decision making for PPA and FPA, making it more likely to stay on the current timeline.

The GMT is aware of a potential new addition to the ROA that would prohibit gear switching for the remainder of the year when 29 percent of the northern sablefish quota share is taken by fixed gear vessels (referred to as a “season” approach in [Agenda Item G.5.a, NMFS Report 1, April 2023](#)). If this comes forward in a motion and is added to the ROA, the GMT thinks it is most appropriate as a separate alternative, as opposed to an option or sub-option under an existing alternative, allowing for more comparative analyses. The team also encourages the Council to be clear about whether and how qualifying criteria would interact with this approach. When reviewing the November 2022 Council discussion around this topic, it was not clear as to whether this 29 percent could only be taken by vessels that qualify as “gear switching participants,” or if any vessels in the individual fishing quota (IFQ) program could take sablefish with fixed gear up to the 29 percent.

Sablefish annual catch limits (ACLs) are currently high, with likely even higher ACLs to come, so the likelihood of creating a “race to fish” under the 29 percent season cap is expected to be low in the near term with high allocations. A race to fish scenario may become more likely in years when the sablefish ACLs are low. Throughout the year, there is crossover between gear switching in the IFQ fishery and other fisheries, such as Dungeness crab in the winter and the primary tier fishery starting in April. If a race to fish is created, gear switcher operational flexibility would likely be reduced, because, if they wished to gear switch, their ability to do so

would be constrained to a more restricted time frame. During the period in which gear switching opportunities are open, gear switchers might need to choose between the fisheries they participate in, and potentially prioritize the more temporally restricted opportunity, rather than participating in them sequentially. However, vessel participation in any one fishery is often influenced by what species buyers and larger processors are taking at the time and their capacity to freeze/store fish. Thus, a race to fish may be constrained by seasonal demand for sablefish compared to other marketable species, as well as other market-based factors. The GMT acknowledges that there are many factors contributing to when a vessel decides to operate in one fishery over another and expects that including a fully specified 29 percent season cap approach into the ROA will allow the analysts to provide a more thorough evaluation of the factors influencing the potential development of a race to fish.

PFMC
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