

## GROUND FISH ADVISORY SUBPANEL REPORT ON TRAWL CATCH SHARE PROGRAM AND INTERSECTOR ALLOCATION REVIEW - SCOPING

The Groundfish Advisory Subpanel (GAP) has serious concerns about how the trawl fishery is performing relative to the goals and objectives of Amendment 20. Based on the current economic environment and challenges with global markets, it is important to understand program performance so that future actions can be taken to make the program more profitable. The GAP supports the annotated outline including the recommendations in the gray boxes in so far as the information is available and provides further details on the following components of the process.

### Proposed Hearing Locations

The GAP believes the proposed list of hearing locations is inadequate and we recommend that hearings be held in person in Westport and Seattle, Washington; Astoria and Newport, Oregon; and Eureka and San Luis Obispo/Morro Bay, California. We support holding two virtual meetings and believe consideration should be made for additional hearings in conjunction with the 2025 March Council meeting in Vancouver, Washington and 2025 June meeting in Santa Rosa, California. Further, GAP members are willing to work with Pacific Fishery Management Council (Council) staff to determine dates that will ensure a minimum number of participants. If a hearing location will only garner lackluster participation, GAP members and staff could decide to cancel that location.

### Focus on Fishery & Community Health

The GAP recommends identification of a limited number of significant indicators to serve as proxies for fishery health that have measurable values from previous benchmarks - possibly from pre-program benchmarks and from the first trawl program review. Additionally, it would be informative to focus on community health since trawl is a capital-intensive business model for boats and processors that require a critical mass of consistent business activity to have a long-term sustainable business model. Community based indicators (lbs., vessels, income, year-round and seasonal processor workforce, fillet lines) are very important to assess fishery health and long-term viability, especially if they can be compared to past values. Many of these indicators are already listed in Section 2.1.6.

To expand further on a critical mass of business activity: If a processor's trawl business level declines to a level where there are less year-round employees and less fillet line capacity, then there are lower trip limits and longer delivery intervals for vessels. Capital intensive businesses require a consistent, decent volume of profitable activity to achieve economies of scale to maintain their assets long-term to be viable. Processors and vessels operating in a community that are not able to sustain that critical mass of profitable activity and asset maintenance are signaling vulnerability for long-term survival. Additionally, a critical mass of trawl activity in a port (or group of ports in proximity) helps sustain the industry-support businesses that provide critical services to not only trawl but also non-trawl fisheries. The seafood economic activity in a fishing community also impacts positively or negatively those in the community not participating directly in a fishing related business.

## Adaptive Management Program (AMP)

The GAP recommends enough information be provided in the document on background and current uses of AMP quota so that if participants want to explore a different use for or elimination of AMP under a follow-on action, it can be informed by the analysis.

## Accumulation & Vessel Limits

The GAP recommends including all of the items listed in the gray box on [page 41](#) of the report as it would allow further evaluation of the sufficiency of current limits.

## Suggested Priority Areas of Focus

- 1) Given the current economic environment and challenges with global markets, the GAP would like to prioritize analysis of the Trawl Rationalization Program goals on increasing net economic benefits and creating individual economic stability.
- 2) The GAP recommends incorporating the results of the [Trawl Cost Project](#) on monitoring into the analysis. There should be enough information to consider the following scenarios for cost savings related to monitoring in a potential follow-on action:
  - Eliminate/reduce coverage for observers and/or catch monitors;
  - Eliminate catch monitors for observed bottom trawl trips;
  - Consider streamlined electronic monitoring (EM) for bottom trawl that maintains catch accounting integrity for select species, but focuses on lower maintenance logbook compliance incentive / deterrent for other species in order to keep costs low; and
  - Explore how the current monitoring program is affecting the trawl fishery program performance and overall groundfish fishery success.
- 3) Whiting
  - How has the 20 percent harvesting shares issued to seafood processors been used and has it met the original intent? and
  - Has the whiting utilization action resulted in increased mothership allocation attainment?
- 4) Non-whiting utilization: Provide enough information in the analysis to consider potential modifications in subsequent follow-on actions that could increase non-whiting utilization, including:
  - Explore carry-over potential when annual catch limit equals the acceptable biological catch (ACL=ABC); explore legal hurdles including rolling average, allowing vessel account carry-over of unused pounds into following year for a limited time (somewhere between three and 12 months); and
  - What are hurdles and pros/cons of using a different start to the fish accounting year, such as May 1<sup>st</sup>?
- 5) The GAP recommends incorporating the results of the Trawl Cost project on Economic Data Collection into the analysis as we described in our [Agenda Item I.3.b, GAP Report 1](#). There should be enough information to consider modifications for cost savings.