

## GROUND FISH ADVISORY SUBPANEL REPORT ON NATIONAL MARINE FISHERIES SERVICE REPORT

### **Support for Fisheries-Critical Work**

The Groundfish Advisory Subpanel (GAP) would like to express our support for the work the National Marine Fisheries Service (NMFS) conducts to facilitate the operation and implementation of our fisheries, such as surveys, stock assessments, and those regulatory actions that allow our fisheries to open on time, operate, and have increased opportunities or flexibility.

### **Take Reduction Team**

The GAP recommends the Council encourage NMFS to announce the Take Reduction Team (TRT) members as soon as possible, so the selected members can plan their lives and be sure they can attend the meetings. Participation on the TRT is a significant commitment and fishermen who participate are not only donating their time, but also losing revenue from being off the water to attend.

### **Cost Recovery**

During the February 19, 2025, GAP and Groundfish Management Team (GMT) webinar, the GAP received a presentation on the Pacific Coast Groundfish Trawl Rationalization Program 2025 Cost Recovery Annual Report ([Informational Report 2, March 2025](#)) from NMFS staff. While this topic is no longer agendized by the Council, it is important that the Council continue to be informed of the GAP discussion.

The GAP would like the Council to be aware of a major change in the mothership (MS) sector cost recovery fee from 1.8% in 2024 to the maximum 3% fee in 2025, a 67% increase. This is due to the fact that NMFS implementation costs increased and - devastatingly - that the value of the fishery reduced by half. At a defining time for MS participants, who are already facing the impacts of the poor Pacific whiting fishery last year, declining stock assessment results and possible total allowable catch (TAC) reductions, recent stock distribution shifts southward, market uncertainty, high fuel and supply costs, it is difficult to also be facing the highest cost recovery fee ever charged to the sector. This is even further underscored by the fact that the MS sector largely manages itself and provides industry-funded data to NMFS and others. MS participants pay out of pocket for a cooperative manager, data monitoring and reporting (Sea State), and for 200 percent monitoring (electronic monitoring or observers on MS catcher vessels, and two observers on each MS processor) - the costs for which continue to increase every year. GAP and industry members are having a hard time understanding why NMFS implementation costs went up when fewer participants than ever engaged in the 2024 MS whiting fishery.

The GAP has long-documented our contention that NMFS has not implemented the cost recovery program methodology defined by the Council and adopted by NMFS, which still does not clearly estimate and subtract pre-trawl rationalization program costs or program efficiencies from current program costs in order to achieve a true “but for” calculation. GAP members have expressed

concerns about how recoverable time is tracked and charged when the recoverable work affects multiple sectors. For example: how is time spent processing or auditing an Economic Data Report (EDC) accounted for a vessel that participates in both the shoreside and MS sectors? Nationally, there are inconsistencies in how different regions implement and track recoverable costs.

The GAP is planning to submit further comments on cost recovery and potential changes to the program under Agenda Item H.8 (Workload and New Management Measures).

PFMC  
03/06/2025