Agenda Item E.7. Supplemental Staff Presentation June 2025

Harvest Specifications Flexibility- Scoping

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Part 1: Overview of Management/Assessment of the Problem

Part 2: Management Measures Scoping

Harvest Specifications and Management Measures Process

- Two-year cycle Two years to develop, then two years worth published in regulations
 - Odd-year: development of assessments and harvest specifications based on BSIA
 - Even-year: specifications and management measures recommended and implemented by NMFS via notice and comment rulemaking

Specification Setting

Overfishing Limit (OFL): Best estimate of max amt of a stock that can be caught in a year w/o resulting in overfishing

Acceptable Biological Catch (ABC): Accounts for the scientific uncertainty in the estimate of OFL, and any other scientific uncertainty

Annual Catch Limit(ACL): Level of annual catch, which counts all sources of annual fishing-related mortality



Default harvest control rules (HCR) for calculating ABC and ACL, which may be modified on a case-by-case basis

- ABC HCR P*/sigma
- ACL HCR 40-10 and 25-5, ACL=ABC

ABC Control Rule Parameter

- Default ABC control rule based on P*/sigma
 - Sigma: Scientific uncertainty around estimated OFL
 - P*: Probability of overfishing
- Sigma includes both a baseline sigma (estimates of uncertainty of the OFL) and time-varying sigma (increasing scientific uncertainty with assessment age)



- P* 0.50 = 500.0
- P* 0.49 = 499.9
- P* 0.45 = 469.6
- P* 0.40 = 440.5

ACL Harvest Control Rule

- For most stocks, Council sets the ACL=ABC
- However, for stocks that are below B40%/B25%, have a precautionary rule to reduce the ABC.



Exploration of the Problem(s)

Took a step back and looked at the management regime and what might be impeding success

Some problems may include:

- Low attainment of ACLs
- Instability is caused by sudden changes in scientific understanding of stock
- Scarcity of some stocks cause constraints in fishing for more abundant stocks

40% of all stocks attain less than 25% of the ACL



Assessment Impacts

Percent decrease from 2020 to 2025

- Petrale= 17.2%
- Canary= 58.2%
- Shelf N= 35.1 %
- Shelf S= 10.3%
- Shortspine=68.1%



Figure 1. Overfishing limits (OFLs) and Annual Catch Limits (ACLs) for select stocks with notable declines in ACLs between 2021 and 2026.

Assessment Impacts

Percent decrease from 2025

- Petrale= 17.2%
- Canary= 58.2%
- Shelf N= 35.1 %
- Shelf S= 10.3%
- Shortspine=68.1%



OFL - ACL

Part 2: Management Measures Scoping

Scoping of Management Measures

- 1. Mid-Biennium Harvest Specifications Change ("green light")
- 2. Changes to the ABC Control Rule (increasing P*)
- 3. Phase-In ABC Control Rule
- 4. Multi-Year Average Catch Policy
- 5. Carryover of Unutilized ACL

- 6. Allocation Framework
- 7. Off-the-top Accounting Change
- 8. Increase frequency of catch-only projections
- 9. Default assessment catch projection catch
- 10. Mixed-Stock Exception
- 11. New OFL/ABC Control Rule
- 12. Annual Specifications

Mid-Biennium Harvest Specifications Change

- Two mechanisms in the current FMP allow changes/create new harvest specifications
 - OFL/ABC/ACL can change if not adequate to meet rebuilding goals ("red light") or if there is an error
 - ACLs/ACTs/HGs can be established/adjusted through POC framework, technical correction, or socioeconomic framework
- Considers adding a framework to the FMP to allow for an increase to harvest specifications for the second year of a biennium based on a new stock assessment (aka "green light")

"Green light" Past Work

- Council and ABs considered this in 2004; not pursued as it was perceived to perhaps subvert the intended stability of the multi-year management process (i.e. biennial spex)
- Began scoping again in 2016, scheduled for FPA in November 2017, but was not adopted due to competing priorities
- Instead, the Council strategically engaged in the stock assessment planning and prioritization process; current process was developed afterward

"Green Light" Potential Trade Offs

- Natural fit to existing biennial harvest specifications process
- Work/time-intensive when pursued on a case-by-case basis with full Council discretionary tailoring
- Expediency could be gained by formulaic approaches in a framework
- Stock assessment teams would need to account for potential midbiennium change in the 10-year projection(s) of the new assessment

Changes to ABC Control Rule Parameter

- Considers raising the maximum P* value from 0.45 to 0.499, which would decrease the reduction from the OFL when setting the ABC
- The MSA gives the SSC the sole authority to set the ABC



Changes to ABC Control Rule Trade-Offs

Proposes to reduce the buffer between ABC and OFL

Engagement with the SSC would be necessary to fully understand trade-offs

MSA authorizes the SSC to calculate the ABC

Phase-In ABC Control Rule

NS1 Allows phase in changes to ABC over a period of time (not to exceed 3 years) as long as doesn't exceed OFL.

Can be done ad-hoc (as done for OR Black RF in 21-22, 23-24) or in framework (like SAFMC)

Framework applies criteria for when phase-in allowed and approach

Council previously considered in 2019, but elected to not move forward with FMP amendment

Phase In Framework

2025 = 163 mt (+161 mt TWL, +2 mt NT) 2026 = 85 mt (+83 mt TWL, +2 mt NT)

Petrale Sole



Phase-In ABC Control Rules- Trade Offs

- Dynamic and prescriptive framework could be a comparably lower incremental workload than status quo (case-by-case ABC control rule) in future
- Case-by-case ABC control rule could provide similar stability as a Phase-in framework, but with higher incremental workload for each use
 - Case-by-case would allow for more tailored implementation

Multi-Year Average Catch Policy

- Used in two potential ways:
 - to determine whether overfishing is occurring in a given year
 - to determine whether new accountability measures are required
- Considered in 2017; learned it is intended for use in fisheries with highly variable annual catch and without reliable inseason or annual data; did not move forward due to high workload and perceived limited benefits
- May have limited applicability to the groundfish fishery, given relative confidence of inseason tracking of catches compared to ACLs

Carryover of Unutilized ACL

NS1 guidelines permit carrying over some unused portion of an ACL from one year to increase ABC in next year.

- Resulting ABC must prevent overfishing- can NOT exceed OFL for stock.
- Two approaches outlined in 2020 NS1 Tech Memo: Utilize the ACL buffer and ABC adjustment

Council previously considered carryover in 2017 and 2018 but didn't elect to move forward due to workload and limited application.

Canary Rockfish



Canary Rockfish



Canary Rockfish



Carryover of Unutilized ACL- Trade-Offs

Would not increase quotas for high attainment stocks

Stabilizing effects

Exemplifies trade-offs of prescriptive framework compared to a discretionary framework

- Prescriptive = if, then statements, broadly applicable, more rapid implementation
- Discretionary = flexible and case-specific, slower implementation

Other Options for Consideration

Allocation Framework

- Typical allocation is trawl/non-trawl→ change to other framework, such as commercial/recreational
- Consider inseason authority to change allocations

Off-The-Top Accounting Change





How does this impact ACLs, allocations & management?

- Increases harvestable surplus available to the GF fishery sectors
- Could increase the risk of overfishing
- Higher than expected catch in "offthe-tops" alone would not trigger ACL-exceedance accountability measures

	Status Quo Accounting (ACL <abc)< th=""><th>Proposed Change to Off- the-Top Accounting (ACL<abc)< th=""><th>Difference (mt)</th></abc)<></th></abc)<>	Proposed Change to Off- the-Top Accounting (ACL <abc)< th=""><th>Difference (mt)</th></abc)<>	Difference (mt)
OFL	2000	2000	-
ABC	1800	1800	-
ACL	1500	1500	-
Incidental OA	20	20	-
Research	15	15	-
EFP	2	2	-
Tribal	35	35	-
Fishery HG	1428	1500	+72
Trawl (95%)	1357	1425	+68
Non-Trawl(5%)	71	75	+4

How does this impact ACLs, allocations & management?

- No practical difference when the ACL=ABC
- Reduces the ACL, but higher than expected catches in "off-the tops" alone would not trigger ACL-exceedance accountability measures
- Inseason actions may not be as strict because not assuming 100% attainment of off-the-tops

	Status Quo Accounting (ACL=ABC) (mt)	Proposed Change to Off- the-Top Accounting (ACL=ABC) (mt)	Difference (mt)
OFL	2000	2000	-
ABC	1800	1800	-
ACL	1800	1728	-72
Incidental OA	20	20	-
Research	15	15	-
EFP	2	2	-
Tribal	35	35	-
Fishery HG	1728	1728	-
Trawl (95%)	1642	1642	-
Non-Trawl(5%)	86	86	-

Other Options for Consideration (Stock Assessments)

Increase Frequency of Catch Only Projections

- Update all spex through rerunning of most recent assessment with updated mortality
- Could be a mid-biennium adjustment (if set up) or fit into annual spex
- Does not alter time-varying sigma, but could mitigate impact
- Consider tradeoffs of increasing # of catch-only projections vs. full or update

Default Assessment Catch Projection Change

- Assume 100% ABC attainment for years 3-10 of decision table
- Likely not suitable for all stocks
- Need to consider how changes in this assumption impact future specifications

Other Options for Consideration (need more scoping)

Mixed Stock Exception

- May allow overfishing on one stock to allow access to target stock(s)

New OFL/ABC Control Rule

- New stabilizing method of setting harvest spex previously scoped by IPHC
- Get rid of low lows and high highs
- SAFMC: Allows constant value ABC for up to 5 years

Biennial vs. Annual Specifications

Biennial cycle:

- Implemented to accommodate rulemaking, maximize stock assessment time, and allow preparing of materials by staff.
- Promote stability, but loss some responsiveness and flexibility

Annual specifications:

- Only changing specifications for stocks with new assessments, information
- May render certain management measures contemplated here unnecessary
- While more responsive, could see less stability and less time to work on nonspex items

Take Homes and Summary

- Multiple items affect the ABC Control Rule
- Changes in catch accounting and policies may provide relief
- Precautionary redundancies could be reduced
- Control reduces timeliness/flexibility



Council Tasks

- 1. Further define the problem(s) facing the groundfish fishery that the action intends to solve
- 2. Outline the desired outcomes of the action
- 3. Provide guidance on developing the range of alternatives
- 4. Provide guidance on next steps, including sequencing actions, if necessary