

GROUND FISH MANAGEMENT TEAM REPORT ON HARVEST SPECIFICATIONS FLEXIBILITY - SCOPING

The Groundfish Management Team (GMT) reviewed the list of pathways to increase adaptability and flexibility outlined in [Agenda Item E.7, Supplemental Attachment 1, June 2025](#). The team discussed which options are likely to produce the greatest flexibility for industry and address the problem(s) identified as part of this scoping process, while meeting our other obligations.

The GMT concluded in our discussion that the following pathways are good candidates to prioritize:

- Mid-Biennium Harvest Specifications Change
- Phase-in Acceptable Biological Catch (ABC) Control Rule
- Carryover of Unutilized Annual Catch Limit (ACL)
- Off-the-top Accounting Change

Including multiple pathways at this time, but narrowing the scope, gives the Pacific Fishery Management Council (Council) flexibility to select a pathway that best meets the needs of the fishery and addresses the problem statement when that becomes specified. The team did not have sufficient time to explore each pathway in detail, but initial discussion suggested that the ideas presented below hold the greatest potential for further development at this time. In the following sections, the GMT provides preliminary comments on select pathways and may provide additional input as the team continues to evaluate their management implications. Additionally, the depth to which the GMT provides comment under any of the items at this time does not necessarily reflect the level to which the GMT supports or sees merit in the proposed pathway relative to others. Numbering of items aligns with the presentation given by Council staff.

1. Mid-Biennium Harvest Specifications Change

This option could offer relief and flexibility to sectors in response to stock assessment outcomes. The GMT recommends being as prescriptive as possible when considering mid-biennium changes. Specificity in a prescriptive framework would streamline and minimize the workload associated with implementing a mid-biennium change.

3. Phase-In ABC Control Rule

As noted in Attachment 1, “the current [Pacific Coast Groundfish Fishery Management Plan (FMP)] FMP framework allows for case-by-case consideration of different ABC control rules” (Attachment 1, section 5.2), and the Council has used a phased-in approach for ABCs in the past for Oregon black rockfish (Attachment 1, section 5.1). This pathway could provide additional stability to participants in the groundfish fishery, as impacts resulting from new stock assessments would be phased-in rather than enacted immediately.

5. Carryover of Unutilized ACL

As noted in Attachment 1 “[a]n ABC control rule may include provisions for the carry-over of some of the unused portion of an ACL (*i.e.*, an ACL underage) from one year to increase the ABC for the next year, based on the increased stock abundance resulting from the fishery harvesting less than the full ACL”. The GMT supports further consideration of a carryover provision that allows a portion of unutilized ACL to be applied in a subsequent year, ideally as a prescriptive framework. A prescriptive framework offers the benefit of being implemented in a timely and efficient manner. This tool could provide additional flexibility without compromising conservation goals. The GMT sees the most benefit to the fishery in Approach 2 (ABC Adjustment), as outlined in the National Standard 1 Technical Memo, which allows for increasing the ABC to account for unharvested ACL in the prior year, provided it remains below the overfishing limit (OFL). This approach offers the greatest benefit in cases where the harvest control rule is $ABC = ACL$, as it allows for a true increase in available yield. Carryover may be particularly useful where co-occurring, non-target species with low attainment constrain access to target species. Allowing unutilized ACL from these species to carry forward could reduce choke points in the fishery or within each sector and support more consistent attainment of healthy stocks, particularly when ACLs decrease between biennia.

7. Off-the-top Accounting Change

In 2016, National Standard guidelines were changed to no longer require that all sources of mortality be counted against the ACL (81 FR 71858, October 18, 2016). As a result, the Council currently has the option to apply some sources of mortality, such as off-the-top deductions, at the ABC level. Several harvest control rules to account for uncertainty are already in place in our harvest specifications and management measures framework. This approach could (partially or completely) replace the existing management uncertainty buffer (*e.g.*, 40-10 adjustment) between the ABC and ACL with catch accounting that currently occurs for many stocks between the ACL and fishery harvest guideline (HG). This approach may be most beneficial for fisheries chronically under attaining the ACL due to constraining allocations. An additional benefit of this alternative arrangement is that if an ACL is exceeded, the Council would be able to utilize accountability measures to resolve the issues that caused the overage. This is possible because, under the new arrangement, only fishery(ies) within the Council’s direct management control could result in an ACL exceedance. For example, if a research set-aside accounted for at the ABC level was exceeded, the ACL would not be impacted, and therefore inseason changes to fisheries management to account for overages in off the top set asides would not be required.

The Tribal off-the-top set asides are a unique case and would require careful consideration if the Council chose to explore this alternative harvest control framework. For example, some Tribal set-asides are court-ordered as fixed percentages of an ACL (*i.e.* Sablefish north of 36° North latitude). If the Council chooses to prioritize exploration of this item, the Council should remain cognizant of the inherent complexity and nuance of this aspect of the catch accounting change.