

GROUND FISH ADVISORY SUBPANEL REPORT ON WORKLOAD AND NEW MANAGEMENT MEASURES, INCLUDING TRAWL FOLLOW-ON PRIORITIES

The Groundfish Advisory Subpanel (GAP) continues to believe that the Pacific Fishery Management Council (Council) should prioritize “more seafood, less salad” groundfish items on the agenda. Spex Flex (A1) continues to be the GAP’s priority. The GAP believes that once Spex Flex is completed, the next priority should be C2 (Risk Management) followed by trawl follow-on actions. Regarding C2, the GAP has already discussed several science items related to the harvest and policy framework and this action is important for all sectors of the groundfish fishery ([Agenda Item E.7.a, Supplemental GAP Report 1, June 2025](#)).

Items C1 and C2 should be formally prioritized and added to the A table. B5 should be removed from the list entirely as the GAP recommended in March 2025 ([Agenda Item H.8.a, Supplemental GAP Report 1, March 2025](#)).

Trawl Follow-On Actions

The GAP spent time reviewing the list of follow-on actions categorized in [Agenda Item C.5. Supplemental Attachment 2](#) and thanks Council staff and National Marine Fisheries Service (NMFS) for identifying the potential actions which were voiced through the ad-hoc trawl workshop and public comment provided at the hearings held over the summer of 2025.

In terms of general comments, it seems appropriate to set the landscape for the trawl rationalization program currently. The program has been a terrific conservation success story. In terms of economic goals and financial benefits to participants, the program is still struggling, particularly for bottom trawl participants, the whiting mothership sector (catcher vessels and processors), and shoreside processors (as discussed in more detail in [Agenda Item G.5.a, Supplemental GAP Report 1, September 2025](#)). It is important to remember that currently 5.5 percent of the ex-vessel value of every shoreside and mothership catcher vessel delivery is deducted by the processor to pay for cost recovery and the [groundfish buyback loan](#). Additionally, catcher vessels are required to have 100 percent monitoring (electronic monitoring (EM) or human observer) which is paid for 100 percent by industry participants. At the same time, there must also be a shoreside catch monitor on 100 percent of offloads, which is paid for by seafood processors. These cumulative costs equate to huge financial burdens on individual operations.

Highest Priority Items

T1 (Observer/Electronic Monitoring) and T2 (Shoreside Monitoring)

The GAP believes that T1 and T2 (catcher vessel and shoreside monitoring) are a high priority for follow-on actions because they have potential to meaningfully reduce program costs and reduce logistical burdens while retaining appropriate accountability.

As described in our September statement on the trawl program review ([Agenda Item G.5.a, Supplemental GAP Report 1, September 2025](#)),

Monitoring costs are particularly high for non-whiting catcher vessels, who have paid between 4.5-6.7 percent (an average of 5 percent) of their gross revenue towards monitoring (between \$612- 722/day for median vessel) since the subsidy for observer coverage expired in 2015. By comparison, whiting catcher vessels monitoring costs as a proportion of revenue have declined to 1 percent on average over the same period, due to the adoption of EM. Monitoring costs for shoreside processors, MS processors, and CPs have generally represented less than 0.5 percent of revenue in any year. These values do not include the indirect monitoring costs paid through cost recovery.

Whiting, midwater rockfish, and gear-switching participants are generally in support of continuing 100 percent monitoring. The GAP recognizes there are pros and cons to reducing bottom trawl observer coverage from 100 percent. On the one hand, reduced observer coverage would help bring down expenses for participants since they are required to cover the full cost of the program out of pocket, and there are other catch share programs in the U.S. that do not require 100 percent monitoring. On the other hand, 100 percent monitoring has clearly been very beneficial to reducing uncertainty in stock assessments, which has benefitted all groundfish fishery stakeholders (commercial and recreational), and personal accountability is a cornerstone of the catch share program.

There is strong support for adjusting catch handling procedures for bottom trawlers using EM, including allowing captains and crew to take a representative sample of discards as observers do, rather than having to sort every fish on deck. Presently, many bottom trawlers do not use EM because of onerous back deck sorting requirements. Especially as there is only one remaining human observer provider on the West Coast, modifying the EM program presents a significant opportunity to maintain 100 percent accountability while reducing monitoring costs.

With respect to T2 and shoreside catch monitoring, shoreside processors on the GAP view reducing monitoring costs as an important step toward lowering overall processing costs. As reflected in both the September and November 2025 trawl catch share agenda items (G.5 and F.7, respectively), the shoreside processing sector has experienced steep revenue declines and rising costs since program implementation:

“For example, the shoreside processing sector is indeed facing increased costs. The September GAP report noted that ‘Fishing and support business and communities depend upon the success of processors – they are a bellwether.’” ([Agenda Item C.7, Supplemental GAP Report 1, November 2025](#))

A portion of these rising costs is attributable to shoreside monitoring requirements. Processors have had to depend increasingly on seasonal fisheries to remain viable while continuing to support both groundfish and other fisheries. The available data does not fully capture how an unreliable and inconsistent groundfish supply, combined with escalating costs, undermine processors’ ability to invest in innovation, improve efficiency and create opportunities for fishermen, processors, and coastal communities.

Duplicative shoreside monitoring costs provide limited additional program value while further constraining a year-round groundfish fishery that has faced persistent challenges since the trawl catch share program began. Shoreside processors on the GAP would like to explore training and

utilizing plant staff to assist with sampling. This could improve the scheduling and logistics of monitors and reduce redundancy. We support strong verification, but there are opportunities to modernize how that verification is done, reducing cost and friction while still preserving data integrity.

Actions that should be analyzed under these items should include:

- Consideration of a monitoring percentage less than 100 percent for bottom trawl;
- Adjustments to catch handling protocols at sea in the EM program, including allowing captains and crew to take a representative sample of discard rather than sorting every fish;
- More regular updates of discard species list based on prevailing risk factors;
- Training plant workers and allowing them to serve as shoreside monitors;
- Reducing shoreside monitoring levels to less than 100 percent; and
- Using EM to monitor offloads.

T10 Cost Recovery

While industry pursues relief from the full burden of cost recovery outside of the Council process, the GAP recommends that cost recovery implementation be analyzed as a high priority follow-on action. The GAP has previously expressed our frustration with the way the cost recovery program has been implemented ([Agenda Item G.2.c, Supplemental GAP Report 1, November 2020](#))

The GAP believes that cost recovery should be borne by all participants who benefit from the catch share program, not just by active participants delivering fish (which is where cost recovery is deducted). Quota share owners who lease out their quota pounds are gaining revenue from the leases but not having to share the cost of managing the fishery.

In addition, the GAP believes there would be benefit in looking at how other cost recovery programs are implemented and billed.

The GAP recommends that the Council consider the following cost recovery program options for analysis including:

- Charging cost recovery to all trawl program participants, not just active vessels –including analysis of an option that would charge 50% of cost recovery to quota share permit owners, and 50% to harvesters
- A review of cost recovery implementation and billing from other catch share programs around the country, such as in Alaska sablefish IFQ where quota share owners pay cost recovery, or other regions where cost recovery is billed quarterly

Lesser Priorities (not in order of priority)

T3 Economic Data Collection (EDC)

The EDCs are onerous for participants to complete, and it is not clear that the level of information being collected is necessary for management purposes. There is a punitive component of EDCs in that the issuance of an annual permit is tied to completing the EDC. The GAP recommends an exercise looking at the information being collected, how that information is used in management decisions, and whether any of the information collected is already available from other sources.

The GAP recommends removing the requirement that an annual permit is only issued if an EDC is completed.

T4 Adaptive Management Program (AMP)

Most active participants in the trawl rationalization program do not believe that AMP should be redirected for other uses. AMP is a program that holds 10 percent of the non-whiting quota share (QS) aside, and quota pounds (QPs) have been annually passed through to QS permit owners in proportion to their QS holdings since the inception of the program. Options that should be considered include permanently allocating the 10 percent AMP QS to QS owners, up to the current ownership caps, allocating AMP QPs out annually to active catcher vessel accounts, or allocating AMP quota shares or annual quota pounds to shoreside processors.

Most GAP members who participate in the shoreside IFQ program support permanently allocating the 10 percent AMP QS to quota share owners, up to the ownership caps, as the preferred alternative. This would permanently end the AMP program and issue the quota shares using the same method that is currently used to allocate AMP quota pounds annually – which trawl participants have become reliant on after 15 years of these pounds being passed through. This option would be one-time, simple, not have high management costs (i.e. cost recovery), and align with the process already in place for distributing AMP.

The GAP would like to include an alternative for analysis that would allocate annual AMP quota pounds to active catcher vessels who are participating in the shoreside IFQ program. This would help offset the high costs of operating a catcher vessel in the trawl program, and reward those vessels that are supporting coastal infrastructure, rather than being distributed to all quota share permit owners – many of whom are “armchair” quota owners who annually profit from leasing their quota pounds but do not contribute to cost recovery, buyback, or have active capital investments that help support coastal infrastructure. However, the GAP discussed that this could become extremely complex to annually determine which vessels were active and how the AMP quota would be distributed, and the implementation of this alternative would be charged to cost recovery. The GAP recommends a formulaic approach and notes that the Council would need to establish very clear guidelines on how active vessels would be determined (i.e., number of trips, number of pounds delivered, etc.), and whether AMP quota pounds would be distributed equally to all active catcher vessels or in proportion to catch.

Shoreside processing members of the GAP would like to see an alternative analyzed that would distribute annual AMP quota pounds to shoreside processors. They stated that shoreside plants are not benefitting from the trawl catch share program, and would like an AMP distribution to shoreside processors that would help anchor quota in communities, help catcher vessels, and provide consistency and stability. However, other members of the GAP did not want to spend the time analyzing this alternative since the AMP is currently being distributed to all participants, and under an allocation to shoreside processors would be taken away from all current recipients and go only to shoreside processors. There was also concern that this allocation would only or mostly benefit processor-affiliated catcher vessels. Shoreside processor members of the GAP propose some sideboards for consideration and/or analysis:

- Distribute *only* quota pounds, not quota shares. This would provide processors the opportunity to use those pounds and demonstrate whether AMP benefits the fishery as a whole;
- Incremental distribution: Distribute only half of the AMP pounds for three years, then the full AMP pounds for the subsequent four years (or until the next catch share review);
- Include the provision for mandatory consideration at the next trawl catch share review. Alternatively, a mandatory reversion of AMP pounds to the existing distribution plan could be considered. That is, after seven years (the time for the subsequent catch share review), the AMP QP would be considered or revert; and
- Include a provision that processors who received AMP QP pay the cost recovery fee. Currently, the boat leasing the QP would bear this responsibility. But to share a portion of the cost recovery, processors could share some of this burden through using AMP pounds.

T5 Mothership Utilization

Mothership catcher vessel (MSCV) representatives in the GAP expressed that some MSCV participants have been disadvantaged during various years since inception of the program, sometimes leaving part or all of their whiting allocation in the water. The processing platforms make up a closed class, and they do not always show up on the grounds due to various business decisions. Issues in the mothership sector were the impetus for the whiting utilization package that became effective in 2023, however some participants believe these have not provided the full benefit they were intended to. During the trawl catch share hearings, some catcher vessels expressed that they would like the opportunity to bring their mothership allocation to shoreside if they do not have a mothership processor market available. The GAP discussed that if this item was taken up by the Council, the Council should take a more holistic consideration of the closed class system that was intended to protect investments, including analyzing a processor allocation if the closed class was changed, or potential for a shoreside processor to lease a mothership permit in order to take MSCV deliveries.

T6 Accumulation Limits

The GAP does not support adjusting vessel limits before QS accumulation limits and own-and-control provisions are properly enforced. Industry members are very aware of participants who are exceeding QS own and control limits and discussed with NMFS about the challenges enforcing these limits given the data available. Also, once own and control limits are enforced, accumulation limits could be considered on a case-by-case basis for underattained species through the biennial harvest specifications process, but no accumulation limits should be adjusted for highly attained or constraining species. The GAP recommends combining Item B3 from Agenda Item C.5. Attachment 1 with item T6 from the trawl review, as they cover the same issue.

T7 Set-Aside Management

The GAP recommends that at-sea set-asides not be changed at this time. However, the GAP recommends taking up more holistic groundfish-level management item under the Risk Management action (currently C2), in order to consider ideas that could benefit all groundfish sectors, such as the performance standard concept presented by WDFW ([Agenda Item C.7.a, WDFW Report 1, April 2026](#)).

T8 Regulatory changes

While the Council has already implemented the ability for a catcher vessel to change their vessel monitoring system (VMS) declaration from mothership whiting to shoreside whiting at-sea, there are other declaration changes that would make sense to consider within the trawl catch share program follow-on actions, such as changing from a shoreside whiting trip to a shoreside midwater rockfish trip at-sea, from a mothership whiting trip to a shoreside midwater rockfish trip at-sea, and from trawl-sector fixed gear to the limited entry fixed gear tier fishery (one-way). This would improve efficiency, fuel burn, and reduce idle labor and unnecessary downtime. This is a practical and administrative solution that would benefit all fishery participants and more closely align management with real world conditions. There is also a bycatch reduction benefit: Rigid declarations force vessels to continue fishing in areas where bycatch risk is higher. Allowing declaration changes at-sea would allow for vessels to shift effort and move away from problem areas. It could also improve plant efficiency and utilization as it would translate to more frequent deliveries. As described in Supplemental Attachment 2, declarations should be added to the rulemaking package for transitioning the trawl gear exempted fishing permit (EFP) to regulations to the degree that they do not slow down the EFP package.

T9 IFQ Quota Species

NMFS and Council staff discussed with the GAP that removing some of the low attainment IFQ species could help with catch accounting, particularly if the bottom trawl sector wants to move to electronic monitoring. However, we also discussed that those species currently appear on quota share permits, which are assets for many QS owners, and may be flagged by banks or considered of lesser value if species are removed. We would also need to consider in tandem with monitoring (T1 and T2) and accumulation limits (T6). There could be benefits to considering this item, but it is not as high of a priority to the GAP.

B2: Increase IFQ carryover from 10 percent

This item has been on the workload list since the previous catch share review. There are limited stocks where this allowance would apply, however, an increase could be beneficial for certain stocks in certain years when the annual catch limit is less than the acceptable biological catch. The GAP suggests including this as a low priority item within the trawl follow on action.

PFMC
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