Agenda Item C.7.a
Supplement GMT Report 5
April 2026

GROUNDFISH MANAGEMENT TEAM REPORT ON THE WDFW PRELIMINARY ANALYSIS OF THE PROPOSAL FOR MORE FLEXIBLE SHARING OF THE CANARY ROCKFISH ANNUAL CATCH LIMIT

The Groundfish Management Team (GMT) extends its appreciation to the Washington Department of Fish and Wildlife (WDFW) for its report on canary rockfish flexibility under Agenda Item C.7. There is broad agreement within the GMT – and likely within the Council as a whole – that consistent under-attainment of a constraining stock due to systematic inflexibility is indicative of a larger issue that should be addressed. The fact that a considerable amount of the canary rockfish Annual Catch Limit (ACL) is left unharvested while every sector is feeling constraints prompts reasonable questions about utilization and equity. The GMT recognizes that the "unharvested" canary rockfish quota, largely within the individual fishing quota (IFQ) sector, is not universally "unneeded". Rather, in the IFQ sector this quota is treated as insurance against large bycatch events that could prematurely shut a vessel down from fishing, such that simply having the quota in a vessel account is valuable, whether or not it is harvested.

There is some disagreement on the relative equity with the current allocation percentages of canary rockfish, how best to reconsider those percentages (if at all), and how to manage to the resultant sector-specific harvest guidelines (HGs) when the ACL is not at risk of exceedance. The GMT concludes that the task, therefore, should focus on a holistic review of how to more effectively utilize the canary rockfish ACL as a whole.

The WDFW proposal serves well to prompt the Council to have these discussions and review current practices in an effort to reform the current management methods for canary rockfish and other constraining stocks. It is the GMT's understanding that the National Marine Fisheries Service (NMFS) West Coast Region (WCR) has concluded that: 1) "*As written, this proposal would constitute a new management measure, and therefore is not eligible for implementation through the biennial specifications rulemaking";* and, 2) "*This Proposal is better suited for a consideration outside of the biennial specifications and management measures process"* (Agenda Item C.7.a, Supplemental NMFS Rpt 1, April 2026). Given these two conclusions, the GMT discussion focused instead on a review of the merits of the proposal, the history of the current allocation framework, and how best to move forward with the core concepts within the Council process.

In discussions with the Groundfish Advisory Subpanel (GAP), WCR representatives, and state management representatives at this meeting and over the last several months, a few salient points have come to the surface regarding this proposal. The GMT offers these considerations to the Council to support their discussion of this proposal specifically, and the existing allocation structure more generally. Below, we discuss sector specific considerations. Broadly, the GMT concluded that the Risk Management agenda item currently scheduled for November 2026 would be a suitable avenue to further explore a suite of flexibility approaches. The intent behind the WDFW proposal, and the thought process driving the proposal, align well with the goal of the Risk Management action.

IFQ Allocation

The WDFW proposal focuses largely on the under-attained portion of canary rockfish ACL, and ways to provide more flexibility to constrained sectors knowing that the ACL is unlikely to be at risk of exceedance. The GMT notes that, while a considerable portion of this under-attainment currently resides in the IFQ allocation, there are items currently on the Council's Workload and New Management Measure Priorities (Agenda Item C.5., Attachment 1, April 2026) that will hopefully provide more flexibility to all groundfish fisheries and are implicitly intended to increase attainment of target and constraining stocks – including canary rockfish. Table A within C.5 Attachment 1 has Specification Flexibility (or Spex Flex) as its top priority, with Carryover of Unharvested ACL ("Big C" Carryover) as the top item within Spex Flex. This measure could alter the current attainment trends for canary rockfish in the IFQ sector, thereby altering the "problem" that the WDFW proposal is seeking to address. Additionally, there are ongoing discussions of how to specifically treat canary rockfish within the IFQ system; for instance, as a risk-pool species that is not targeted and does not have quota individually allocated.

Non-Trawl Allocation

In September of 2025, the GMT provided a report to the Council which discussed the history of the canary rockfish allocations utilized by the Council since 2015 (Agenda Item G.6.a. Supplemental GMT Report 1, September 2025). As detailed in this report, allocations and sharing agreements have been iterative since the species was declared rebuilt. However, the allocation framework as it presently stands is not universally supported by participants in this Council process. As highlighted by the WDFW report and advisory body discussion during and prior to this meeting, there is also a lack of clarity and agreement on: 1) the existing intra-allocation accountability measures, 2) what the Council needs those accountability measures to be, 3) and what the Council *wants* those measures to be.

The GMT understands that, despite a history of allocation under-attainment in the IFQ sector, the Council cannot structure pre-season planning such that an allocation is projected to be exceeded – even when the risk of exceeding the ACL is low. Additionally, should management consistently result in over-attainment of an allocation, consideration of the Council's accountability measures and whether they are operating as intended is warranted. **The GMT recommends the Council continue to explore opportunities to improve flexibility for all groundfish sectors, particularly for stocks that are consistently under-attained while some sectors are constrained.** The Council could also consider an alternative to the harvest specifications cycle through which the canary rockfish allocation proportions could be evaluated for potential revisions.