SCIENTIFIC AND STATISTICAL COMMITTEE REPORT ON HARVEST SPECIFICATIONS AND MANAGEMENT MEASURES FLEXIBILITY

Jessi Waller of the Pacific Fishery Management Council (PFMC) provided a presentation on proposed options to increase flexibility in establishing harvest specifications in an effort to add long-term stability to the fishery. The proposed alternatives will provide exceptions and deviations from the traditional application of harvest control rules that may complicate scientific advice and increase the risk of biological overfishing. The Scientific and Statistical Committee (SSC) discussed considerations surrounding opportunities for greater flexibility and can provide feedback to address concerns that arise during further development of alternatives, including understanding complex interactions among options. However, additional time for review is required to fully evaluate the proposed action. In addition, input from Federal colleagues, who did not have time to review documents provided in the briefing book due to the furlough, is required for a more complete review and response.

The SSC considered the four questions presented in the SSC Memo and identified a number of potential issues with each of the alternatives, but did not have sufficient time to review and discuss these in detail. The SSC proposes a focused meeting of the Groundfish Subcommittee (GFSC) to further consider this item prior to the March Council meeting for a more comprehensive response prior to a final decision. As such, the SSC recommends that the Council postpone final decision making to at least April 2026, given the proposed need for further SSC review in March.

With the limited time available, the SSC was only able to provide overarching considerations rather than specific recommendations. There are often tradeoffs between competing management objectives. The proposed options for increasing flexibility may result in increased risk of overfishing and the long-term costs associated with overfishing. They may also increase year-to-year variability in landings. Furthermore, many of the proposed options decouple the setting of acceptable biological catches (ABCs) from the traditional P* framework, which converts decisions regarding risk tolerance from an explicit decision to an implicit result of the emergent ABC buffer. More generally, a better understanding of the drivers of under-attainment and fishery stability would be helpful to understand if and how the proposed alternatives are likely to address the problems identified by the Council.

The proposed options for flexibility would also make harvest control rules (HCRs) increasingly complex and will result in frequent departures from the default harvest control rules, which were carefully designed to achieve management objectives. This increases workload and risk due to the application of untested harvest control rules. There is growing evidence that ramped HCRs, such as the 40-10 rule used for rockfish and 25-5 rule used for flatfish, provide many benefits resulting from added precaution at low stock sizes. Many of the proposed practices would reduce the level of precaution prescribed by the default rules, limiting their ability to deliver intended benefits, which include rapid rebuilding, resilience to climate-induced shocks, stable catch, and high long-term yields.

A best practice in designing harvest control rules is to test their ability to achieve objectives under uncertainty through management strategy evaluation (MSE). The proposed options for increasing flexibility would effectively introduce more HCRs that have not been evaluated for their likelihood of meeting objectives. MSEs are time and resource intensive and are unlikely to be available to support near-term decision making. However, there are many published papers and recent analyses that have used MSE to look at the effects of harvest specification changes that can provide insights on potential benefits and pitfalls of these strategies in other regions. An MSE for select US West Coast fisheries could be performed to compare these proposed strategies and quantify risks of overfishing. This would take time, planning, and likely a dedicated analysis with pre-specified analysis goals.

PFMC
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