

Harvest Specifications and Management Measure Flexibility

Agenda Item F.5.

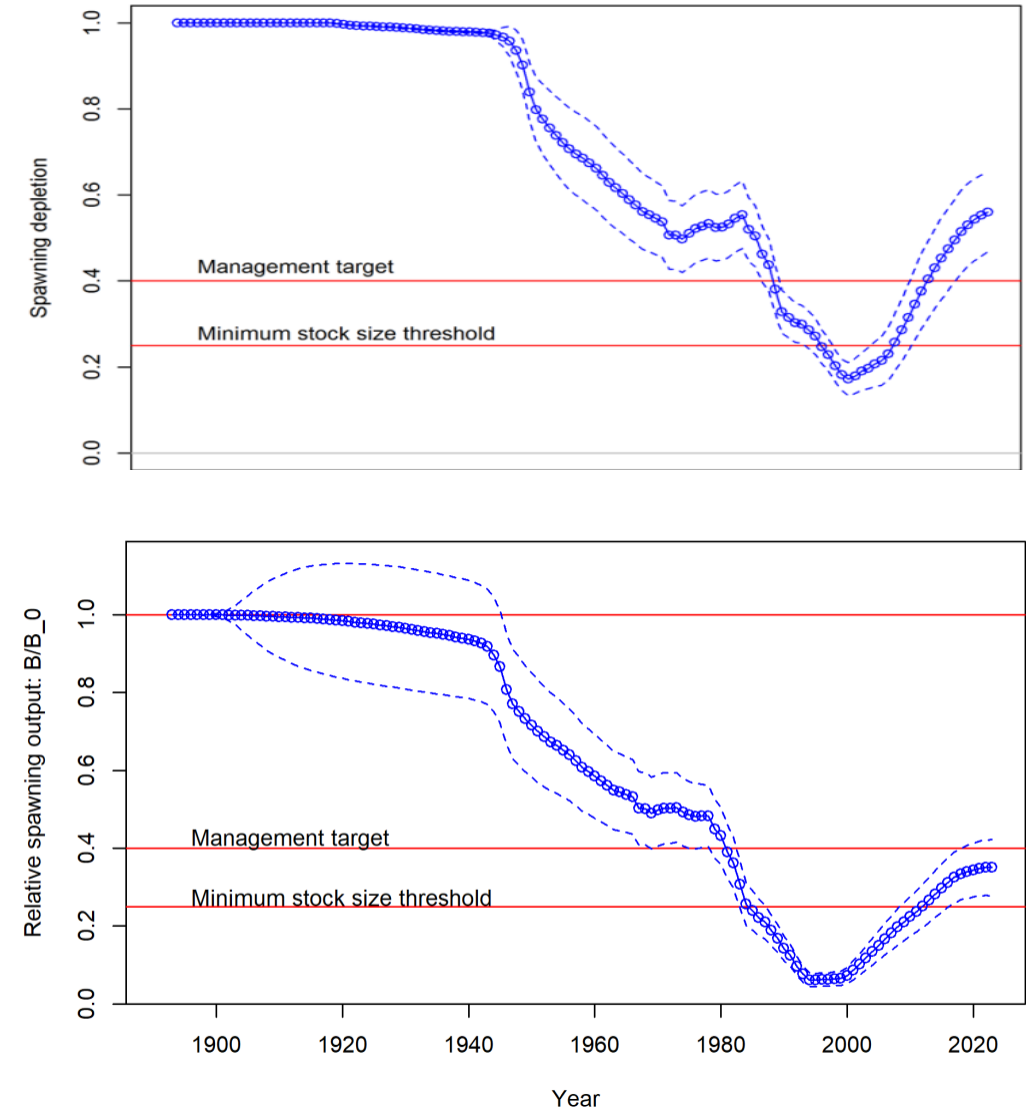
November 2025

Issues facing the groundfish fishery

- Steep changes in harvest opportunities resulting from changes in scientific understanding
- Changes in specifications of the status of a species
- Staleness penalties for older assessments (i.e., time-varying sigma)

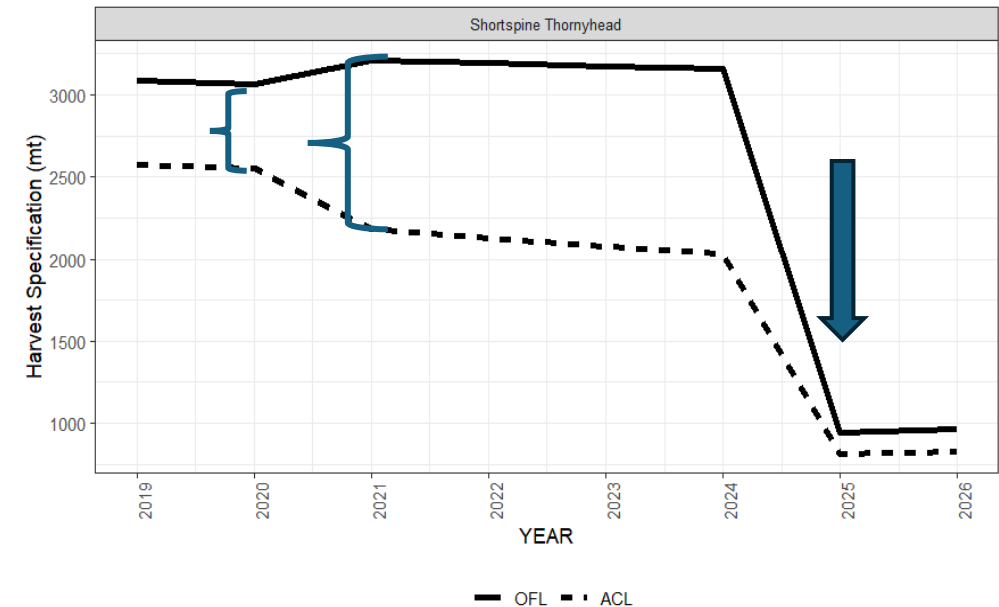
Canary Rockfish

Figure e. Estimated relative depletion with approximate 95% asymptotic confidence intervals (dashed lines) for the base case assessment model.

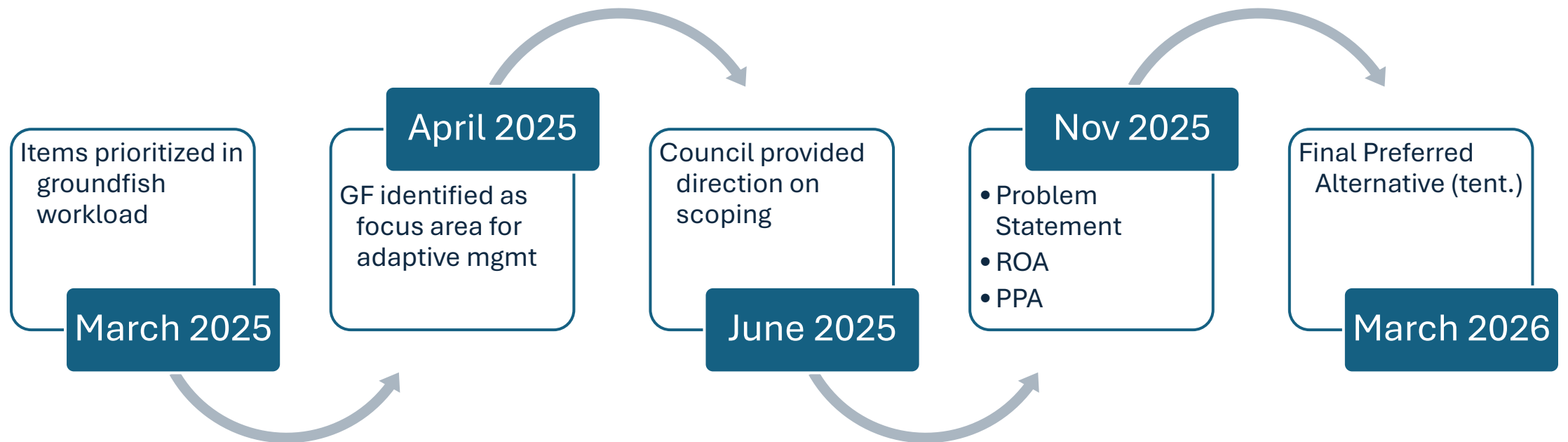


Issues facing the groundfish fishery

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- Changes in specifications of the status of a species
- Staleness penalties for older assessments (i.e., time-varying sigma)



Timeline



Council Tasks

01

Adopt a problem statement

02

Adopt a range of alternatives

03

Adopt a preliminary preferred alternative, if possible

Briefing Book Materials

- Attachment 1: Analytical Document
- Attachment 2: Alternatives and Options
- Supplemental Attachment 3: Synthesis

Problem Statement

- See page 5 of Attachment 1 (based on GAP June report)
- Identifies the issues related to scientific understanding
- These issues can lead to changes in fishing behavior, harvest strategies, and market disruption.
- Multi-species nature of fishery means reduced harvest specifications for one stock can reduce access to other stocks leading to magnifying the negative socioeconomic impacts of harvest specification adjustments.
- Items designed to promote increased access and landings of groundfish resources, long-term stability
- Modify the FMP to provide tools to address changes in more expeditious manner

Action Items

Carryover

Phase-In of ABC Changes

Mid-Biennium Harvest Specifications Change

Accounting for Off-the-Top Deductions

Harvest Specifications Frequency

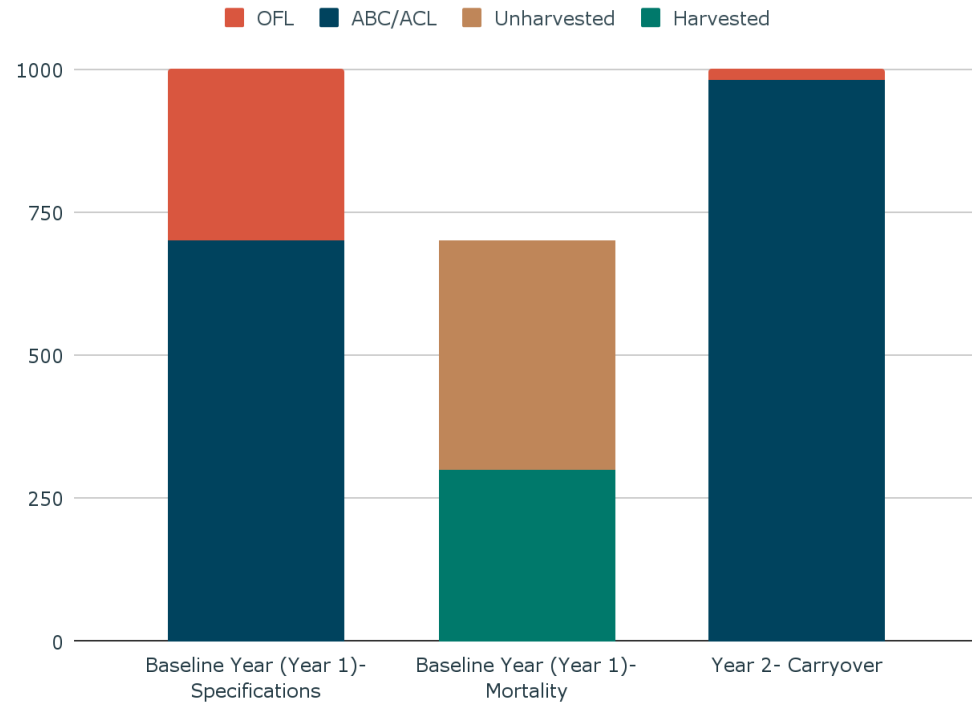
Carryover

Overview

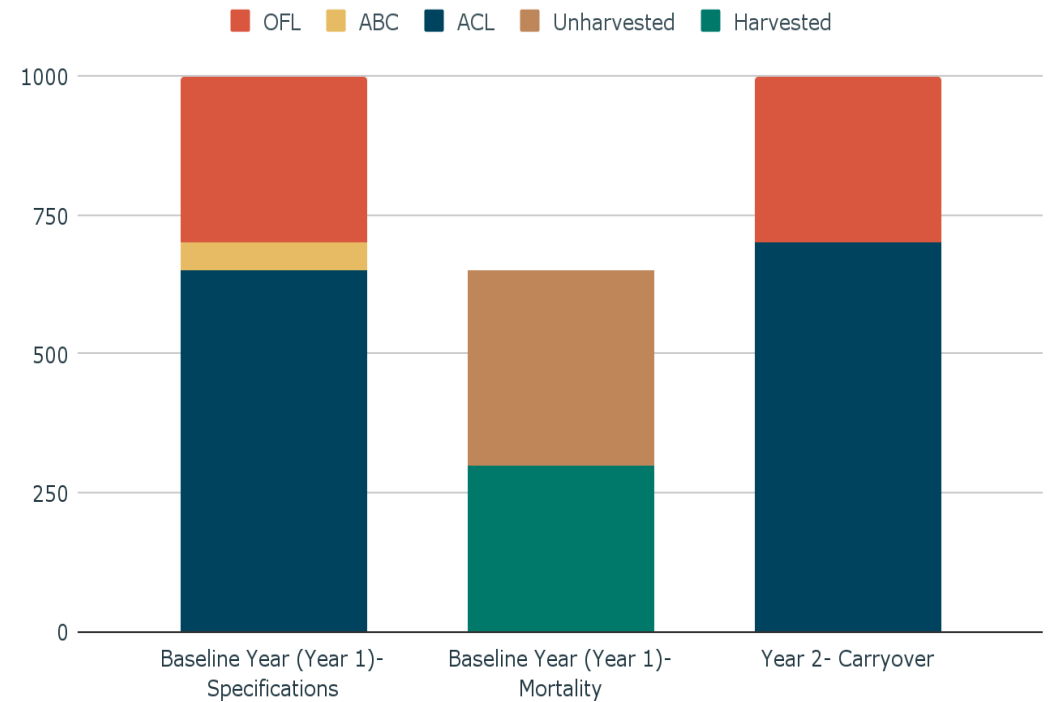
- Currently- any unharvested ACL can't be utilized in a future year unless considered under a stock assessment/projection.
 - IFQ Surplus Carryover- Up to 10% of unutilized vessel level quota can be carried over for species where $ABC > ACL$
- Carryover of unutilized ACL was permitted through the 2016 NS 1 Revisions to address:
 - Underattainment
 - Relieve pressure on industry to catch limit
 - Address premature closures

Carryover- Action Alternatives

ABC Carryover (Alternative 1)

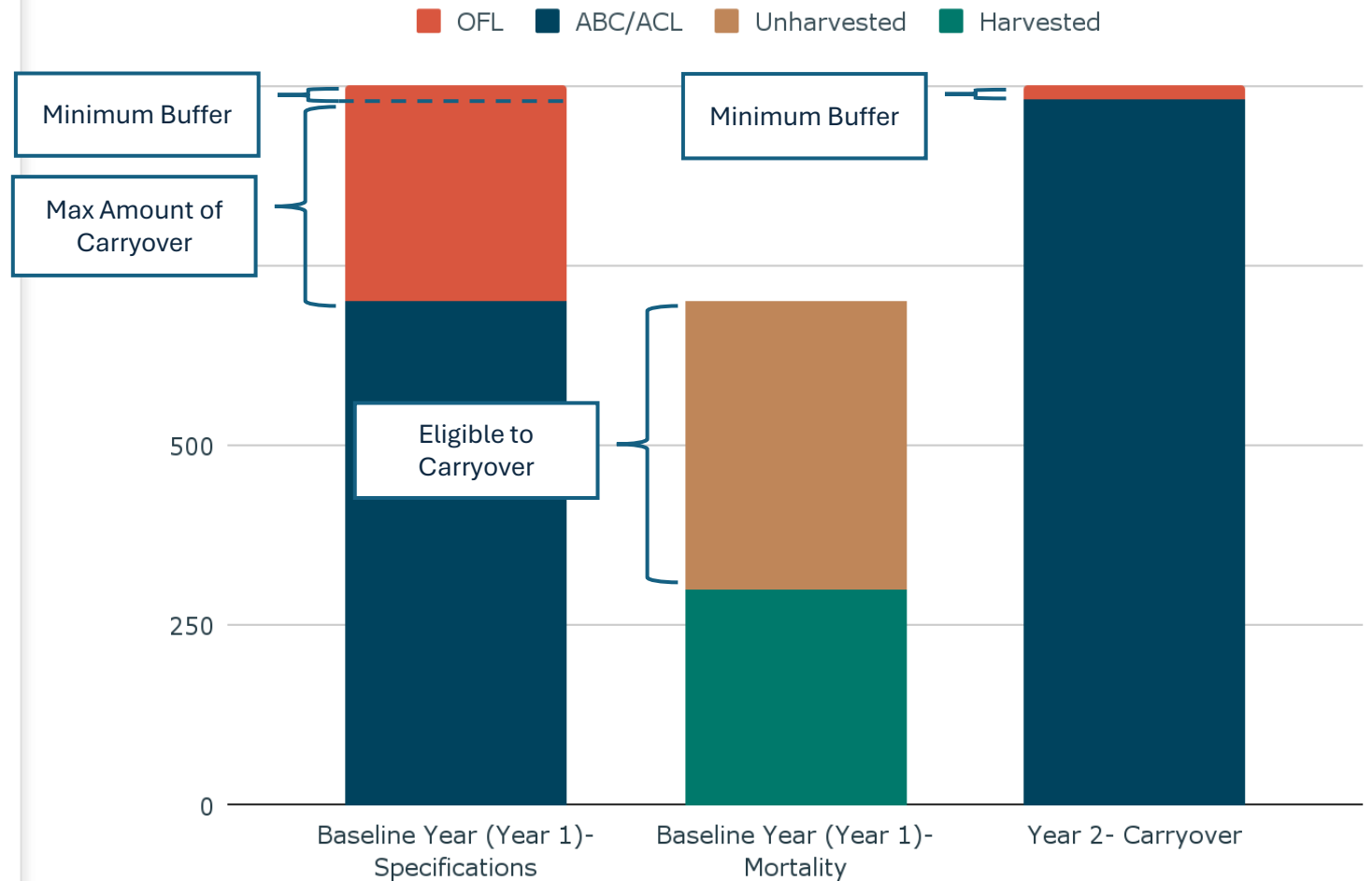


ACL Carryover (Alternative 2)



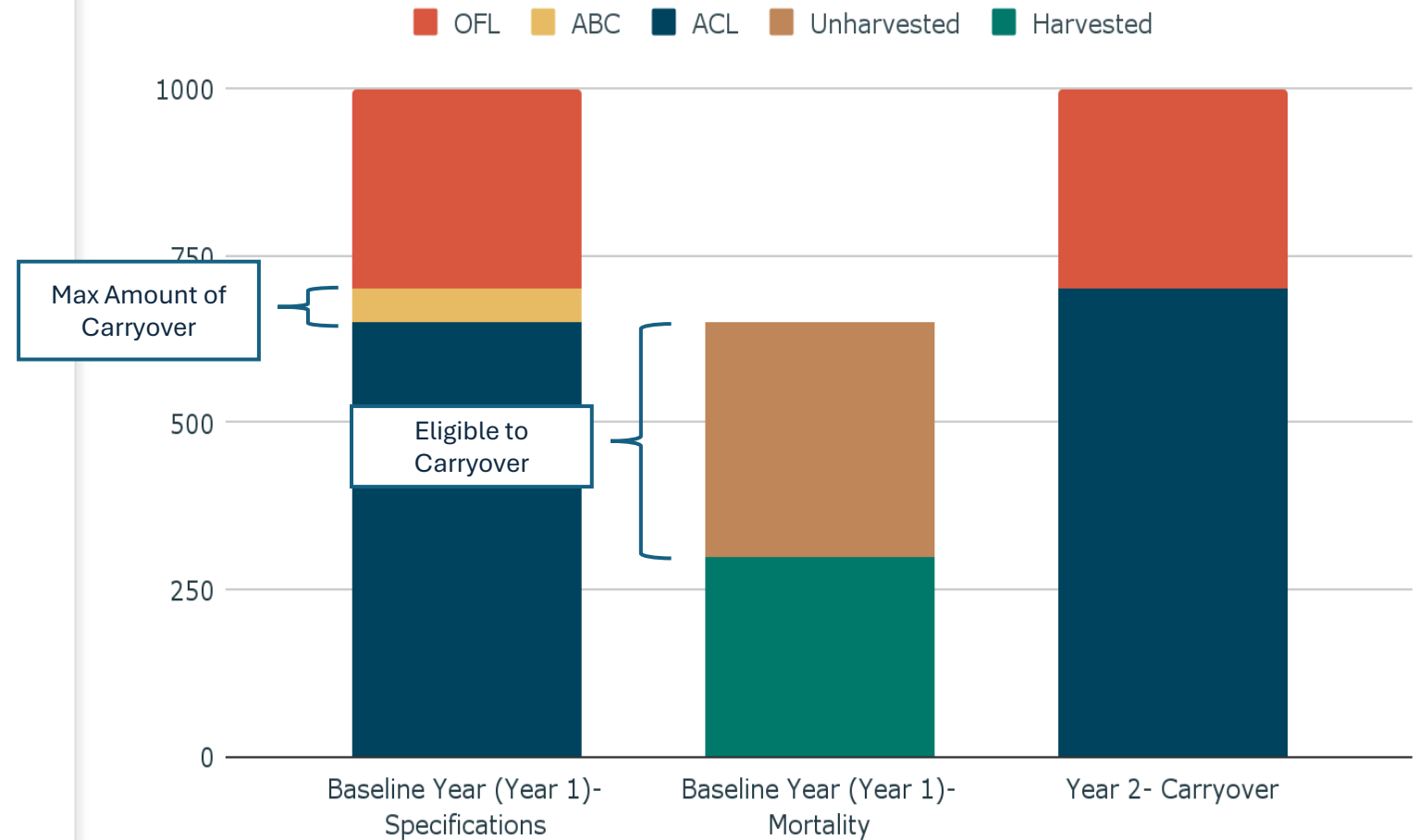
ABC Carryover (Alt 1)

- Increase both ABC and ACL
- NS1 contemplates ABC=ACL, but staff proposed maintaining the default ACL HCR under Alternative 1 (e.g., 40-10 rule)



ACL Carryover (Alt 2)

- Increases ACL up to ABC
- Likely to be used less than ABC Carryover (Alt 1) because most stocks have $ABC=ACL$



Stock Eligibility Criteria

- **Criteria can differ between alternatives, but at a minimum, must have some unharvested ACL**
- **Options:**
 - A: Stock status known and stock is not overfished
 - Stock complexes currently not eligible- but could be in future
 - Could consider Carryover for overfished stocks
 - B: Stock not subject to Phase-In (ABC Carryover only)
 - C: Stock has not exceeded ACL more than $\frac{1}{4}$ years

Process Options

How is Carryover Implemented?

Process Option A: Stock-By-Stock

- Determine during spex process, which stocks in need
- Continue until Council says otherwise
- Could result in a stock not getting carryover when needed if not identified

Process Option B: Default

- All stocks eligible, unless criteria met
- Limit decisions, but increase work for stocks where Carryover not needed

Data Options

What data is used to issue Carryover?

Data Option A: Year 1 to Year 3

- Utilizes WCGOP total mortality estimates (available in Sept of Y2)
- Maximized carryover because would have total mortality estimates

Data Option B: Year 1 to Year 2

- Contemplated in NS1 Tech Memo
- Likely based on projection- potentially partial Carryover
- Would need to consider how to account for overages/payback
- Potentially issued later than Data Option A

Options for Minimum Buffer between OFL and ABC

- NS1 does allow for $OFL=ABC=ACL$
 - NMFS notes that there are few fisheries where appropriate
 - PFMC policy sets ABC below the OFL (typically by P^*/σ)

Option A: Maximum extent

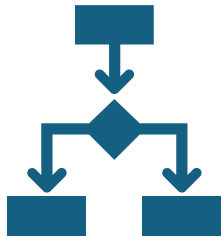
- ABC set at X percent less than OFL

Option B: Category based

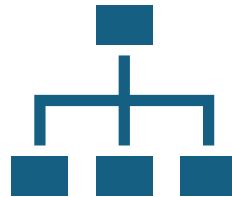
- Allowance to increase based on assessment category

Options for Management Measures

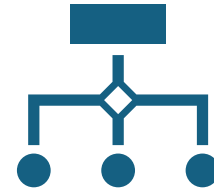
How does Carryover get issued through allocation framework?



Should the same tribal off-the-top deductions be applied?



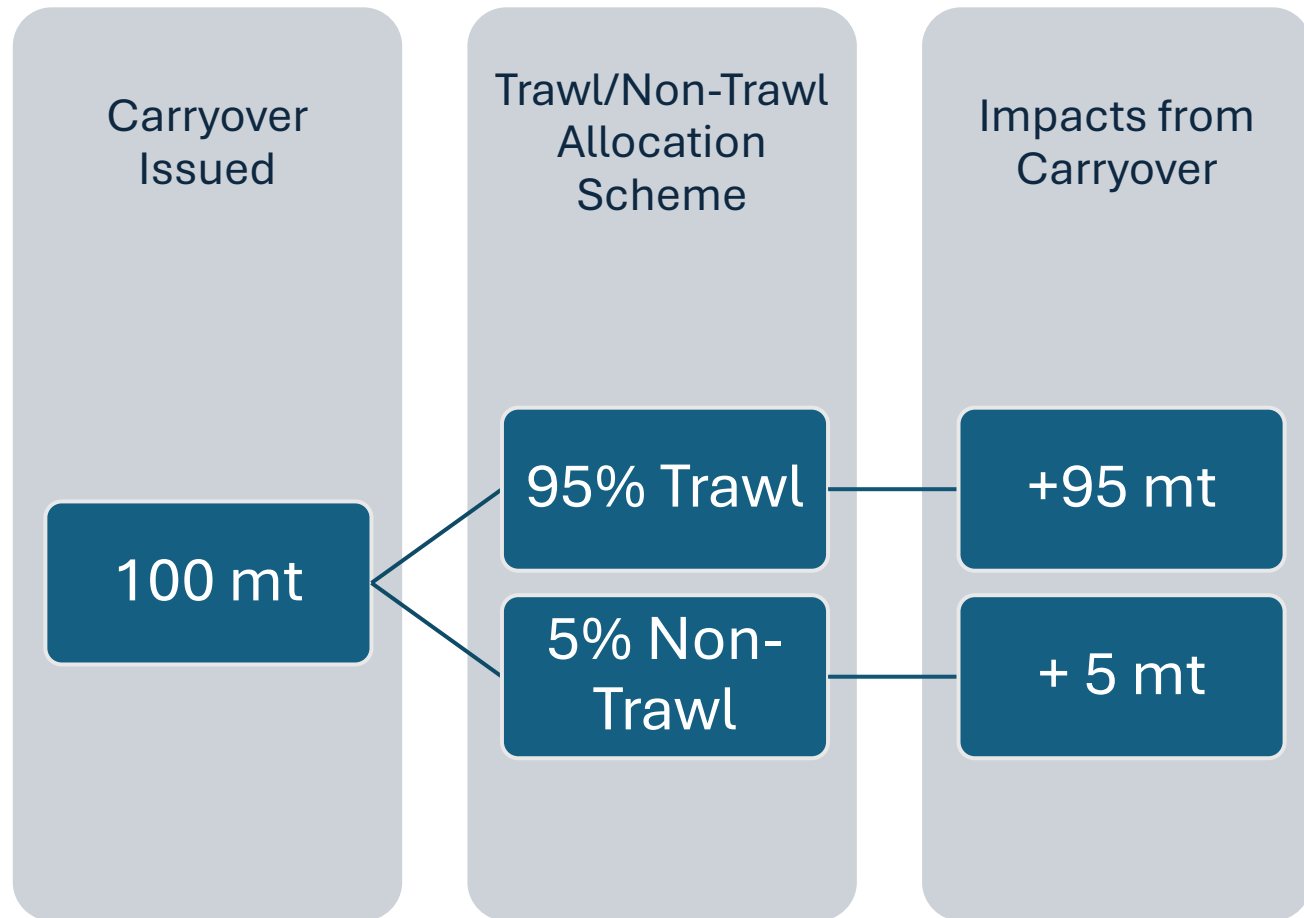
How should allocations, HGs, etc. change?



Should set asides for at-sea change- and how?

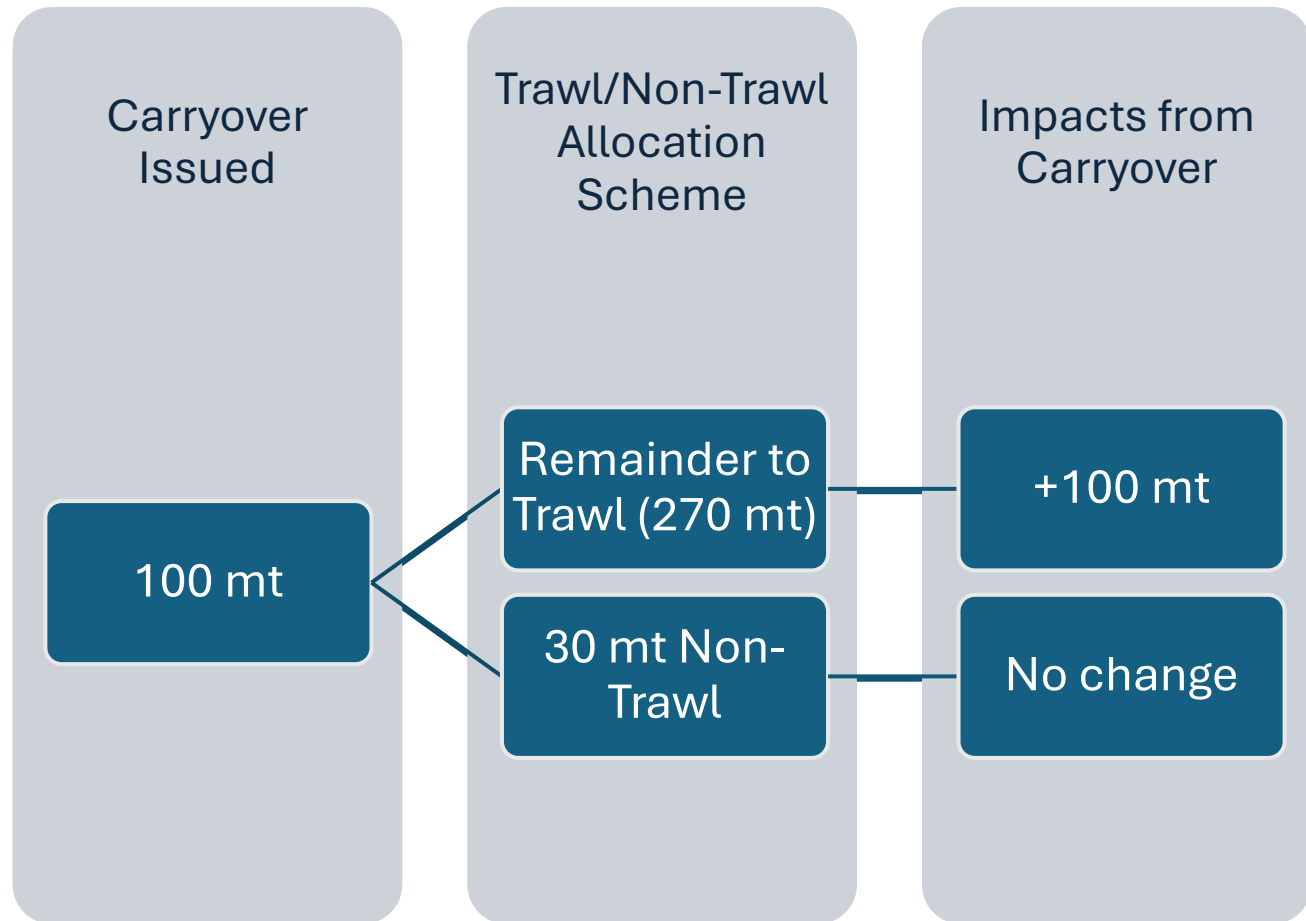
Harvest Specification Options

- Tribal Off-the-Top
- Allocations/HGs
 - 1: Proportional
 - 2: Remainder Only
 - 3: If/Then
- At-Sea Set Asides
 - 1: No Change
 - 2: Proportional



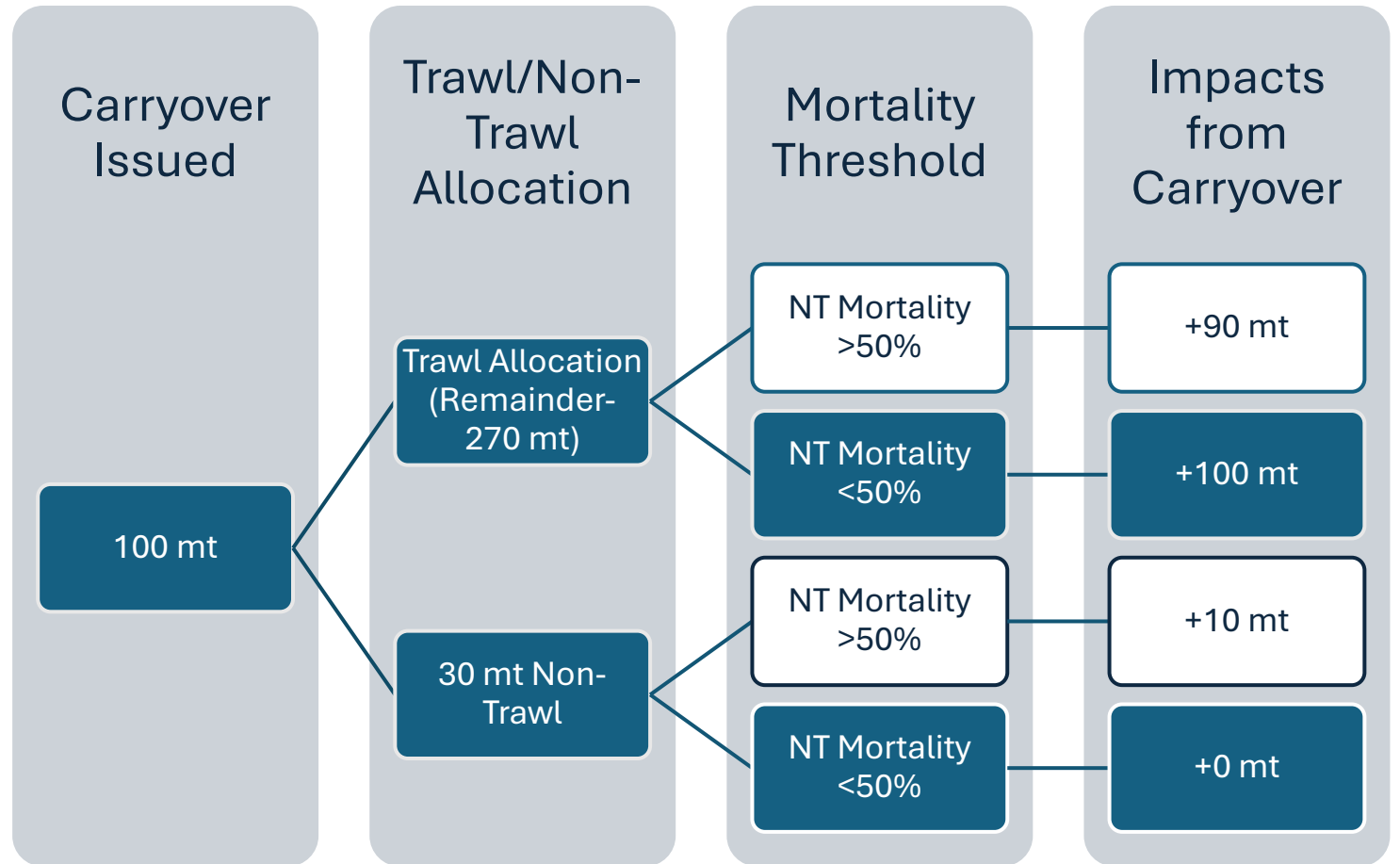
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Summary of Options

Stock Eligibility Criteria

Process Options: How is Carryover implemented?

Data Options: What data is used to issue Carryover?

Options for Minimum Buffer between OFL/ABC

Options for Management Measures

- Tribal Off-the-Tops
- Allocations
- At-Sea Set Asides

Carryover Discussion

- Action alts: continue to prevent overfishing through mgmt. measures
- Carryover could increase the risk of biological overfishing; fewer precautionary adjustments to decrease catch limits below the OFL in the event that the OFL was set too low.
 - Alt 1 higher risk than Alt 2
- Need to consider stock assessment impacts (TOR)
- May help increase attainment/provide opportunity
- Need to consider reason for underattainment (constraints vs. stock size decline)

Phase-In of ABC Changes

Overview

- Harvest specifications are typically changed in line with the assessment results, with no ability to slowly implement (aka phase-in) the results of the assessment unless it was conservative in nature.
- Phasing in changes to ACLs has always been allowed, as long as the ACL does not exceed the ABC.
- NS1 Revisions included a provision to allow changes in ABC to be phased in over 3 years or less, as long as overfishing is prevented.



Alternatives

No Action

- Ad-hoc HCRs available, including phase-in ABC or ACL HCR.
- No guidelines in FMP on how to implement and lack of clarity about what the default is after a phase-in

Alternative 1: Phase-In Framework

- Allow ABC increases or decreases for up to three years
- Outline stock eligibility criteria
- Specify what happens with default
- NOT automatic

Stock Eligibility Criteria

- Option A: Stock not selected for ABC Carryover
- Option B: New assessments shows ABC <85% of existing ABC
 - Table 4 shows that 10/16 stocks would have triggered phase-in based on 85% trigger
 - However, this trigger could include/exclude stocks of importance
- NS1 Tech Memo outlines stock generation time as important consideration
- Eligibility criteria could be put in FMP (like Carryover) or may be better for TOR

Phase-In Discussion

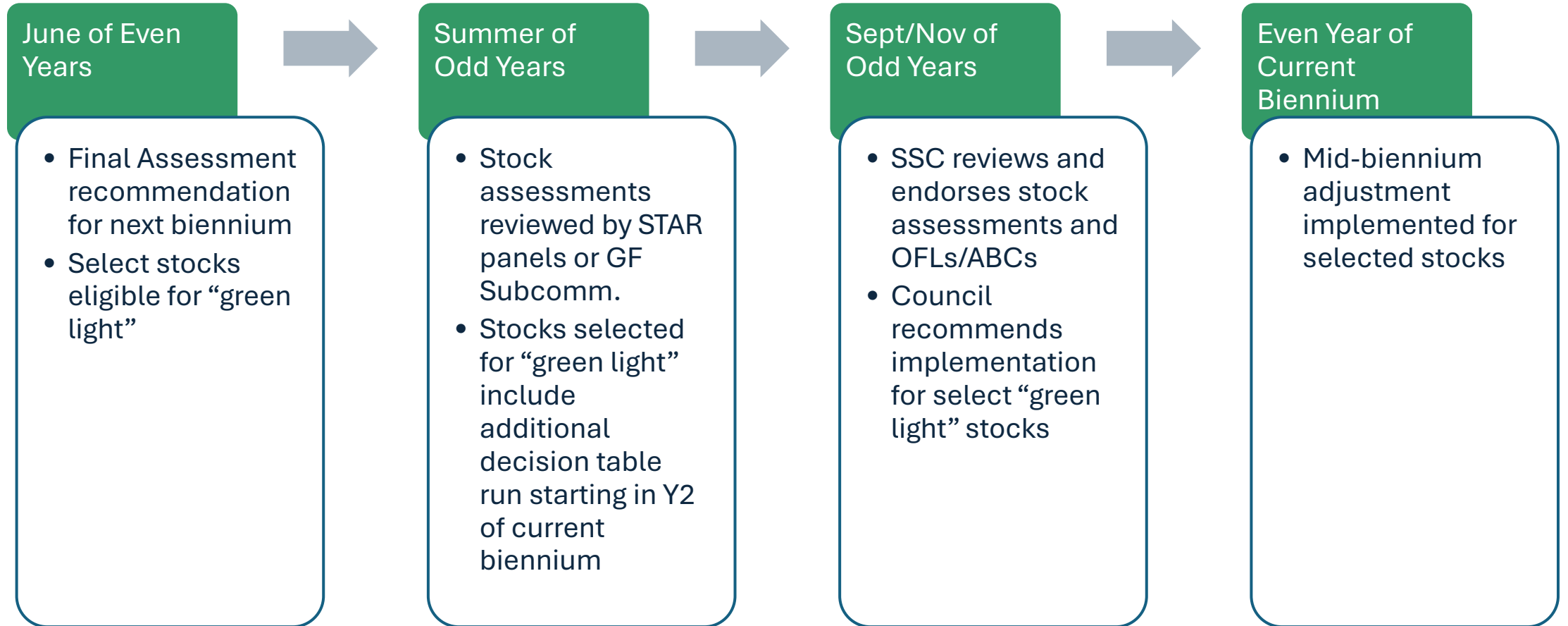
- Council could continue to select ad-hoc HCRs under No Action or Alternative 1
- No Action= greater workload b/t Sept and Nov during spex years
- Alt 1= improved clarity, increased efficiencies
 - Stock assessors could provide harvest specifications table that incorporates phase-in, rather than waiting until Sept of a spex year
 - Minimize the potential number of alternatives to analyze after September
 - Add details to TOR through 2026 process (concepts posed in Attachment 1)

Mid-Biennium Harvest Specifications Change

Overview

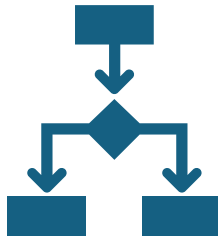
- Current FMP:
 - OFL/ABC/ACL can change if not adequate to meet rebuilding goals (“red light”) or if there is an error
 - ACLs/ACTs/HGs can be established/adjusted through POC framework, technical correction, or socioeconomic framework
- Alt 1: Considers adding a framework to the FMP to allow for an increase to harvest specifications (OFL/ABC/ACL) for Y2 of a biennium based on a new stock assessment (aka “green light”)
 - Proposed as prescriptive to provide quick implementation

Proposed Process

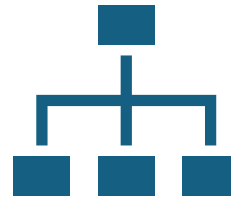


Options for Management Measures

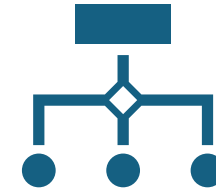
How would green light change be allocated through framework?



Should the same tribal off-the-top deductions be applied?



How should allocations, HGs, etc. change?



Should set asides for at-sea change- and how?

Case Study: Canary Rockfish (2015)

- 2015: Lightning strike resulted in a vessel being in deficit until 2017
- 2015: Canary assessment came back rebuilt
- Vessel would have been able to fish in 2016
- Plus- benefits to all sectors

	Original	Green Light
OFL	729	1567
ABC	679	1499
ACL	125	1499
HG	110	1484
Trawl %	53.2%	
Trawl All	58.5	789.2
IFQ	44.48	600.1
Vessel Limit	9806	132294
Non-Trawl %	46.8%	
Non-Trawl All	51.3	694.8

Mid-Biennium Harvest Specifications Change Discussion

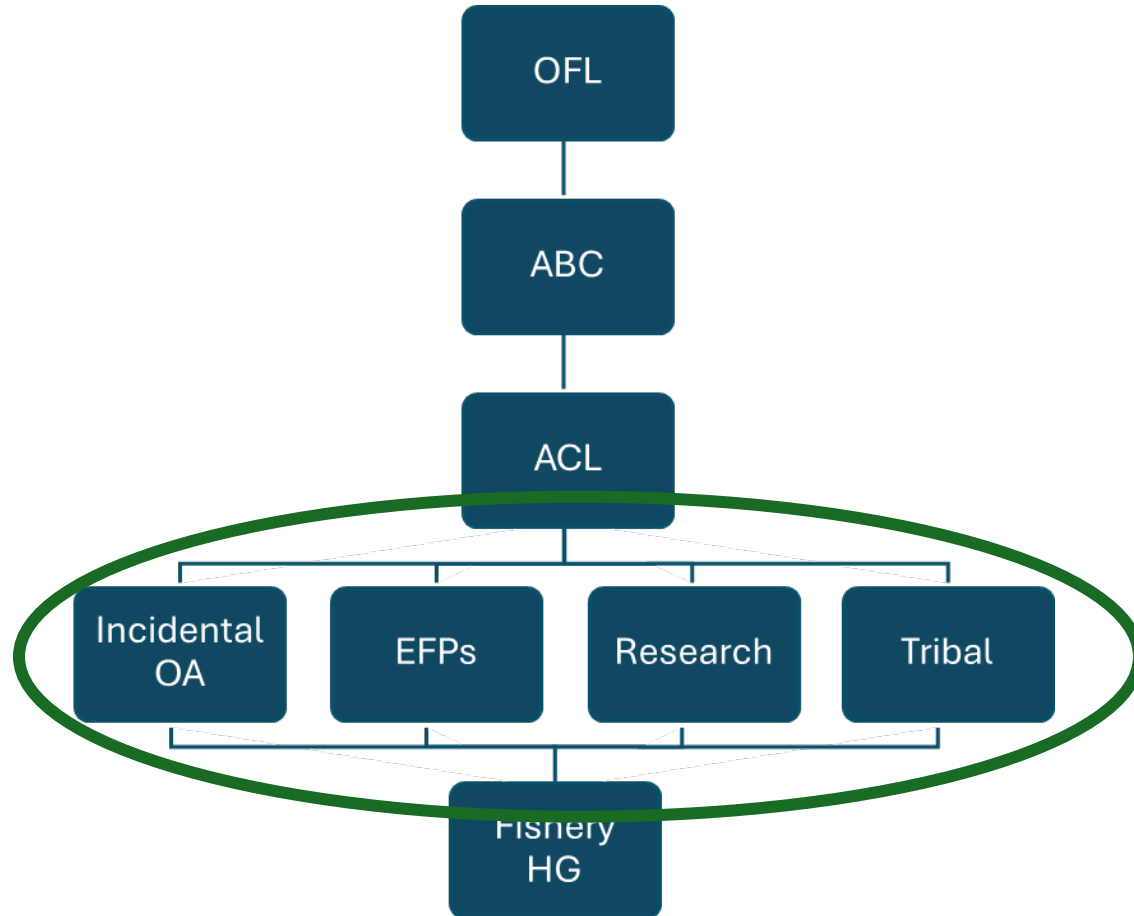
- No Action- no mechanism available to increase in Y2 when new positive assessment comes back
 - Delay can negatively impact the fleet, cause unnecessary constraints
- Alt 1: Provide socio-economic benefits, but potentially less stability
- Alt 1 could increase workload- but process allows for recommendations to be for stocks with significant benefits

Accounting for Off-the- Top Deductions

Overview

- ACL accounting was established in 2010 with Am 23 to align with 2009 NS 1 revisions
 - Was not updated in 2016
- 2016 NS1 Revisions changed accounting provisions:
 - “Where practicable, all sources of mortality including that resulting from bycatch, scientific research catch, and all fishing activities should be accounted for in the evaluation of stock status with respect to reference points.”

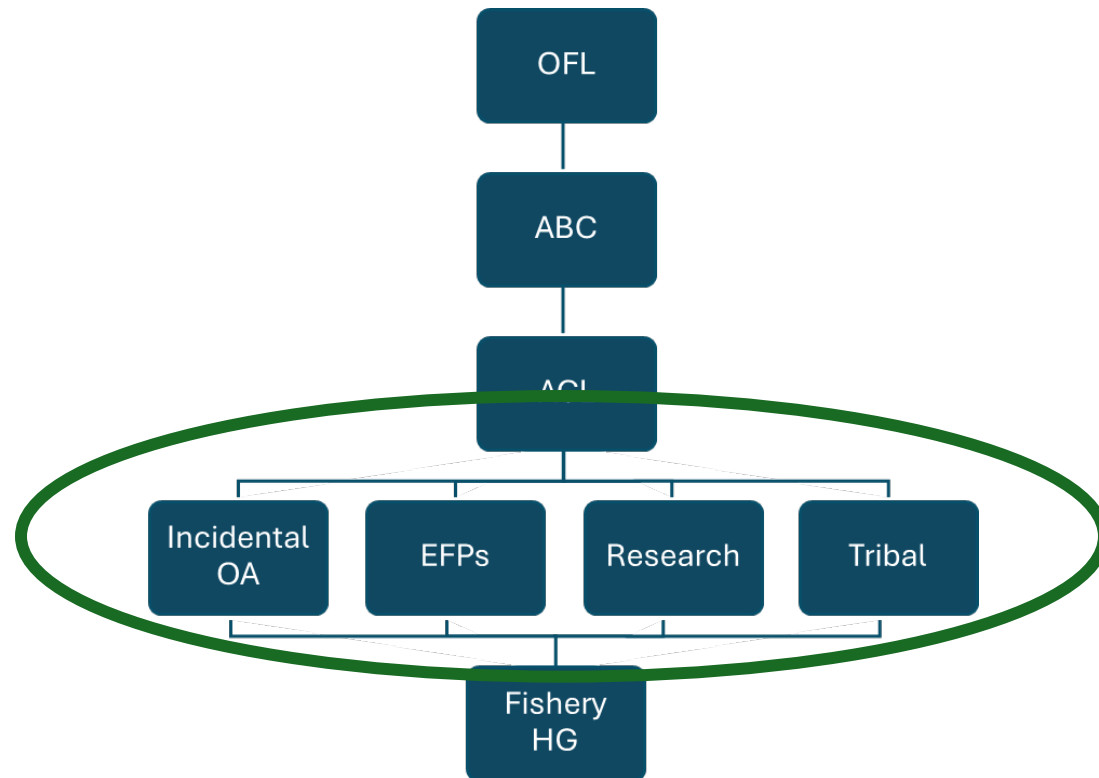
Alternatives



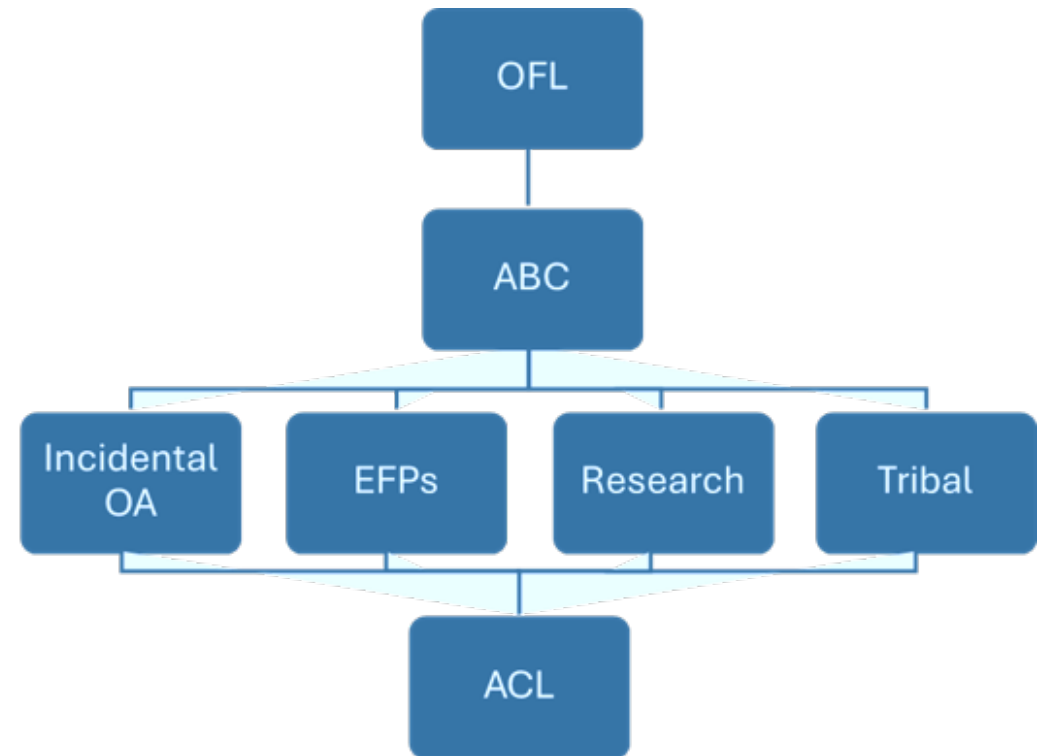
- Structure for all stocks/complexes except sablefish north (specified in FMP)
- Can be adjustments mid-biennium
 - re-allocate to directed GF for unforeseen events

Alternatives

No Action

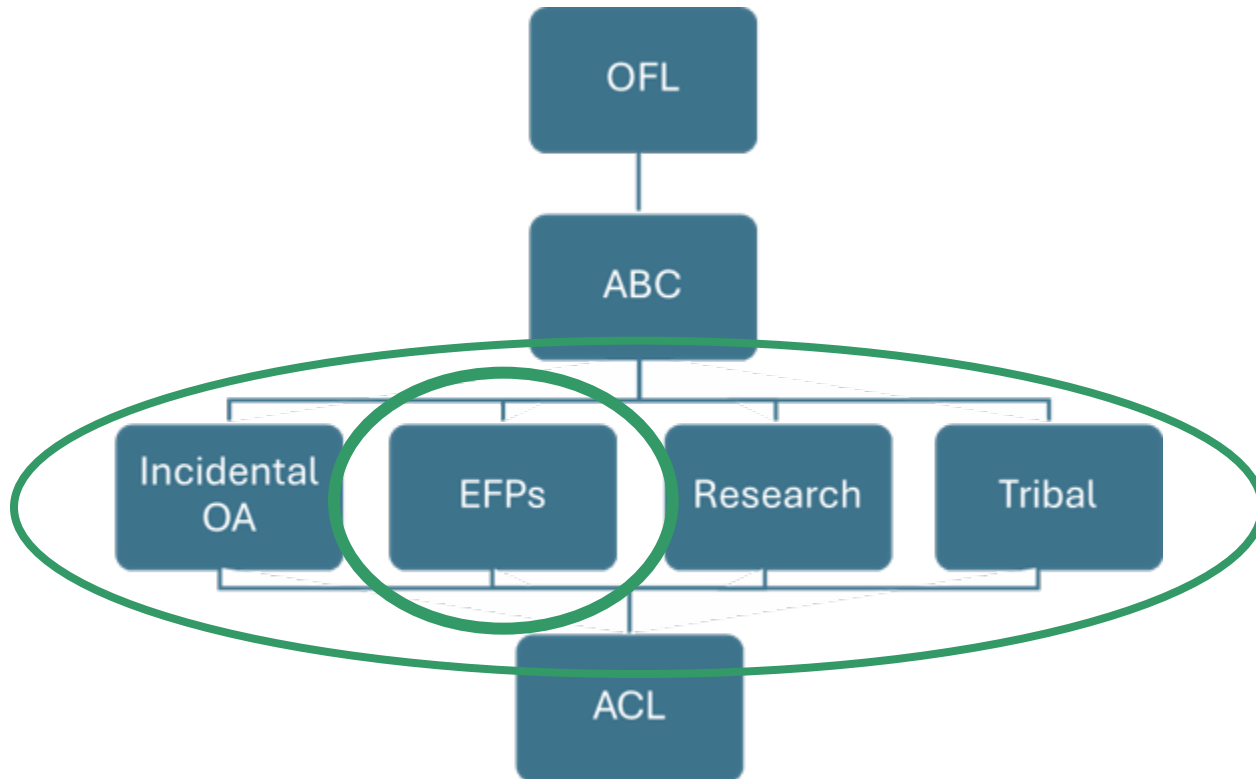


Alternative 1: All off ABC

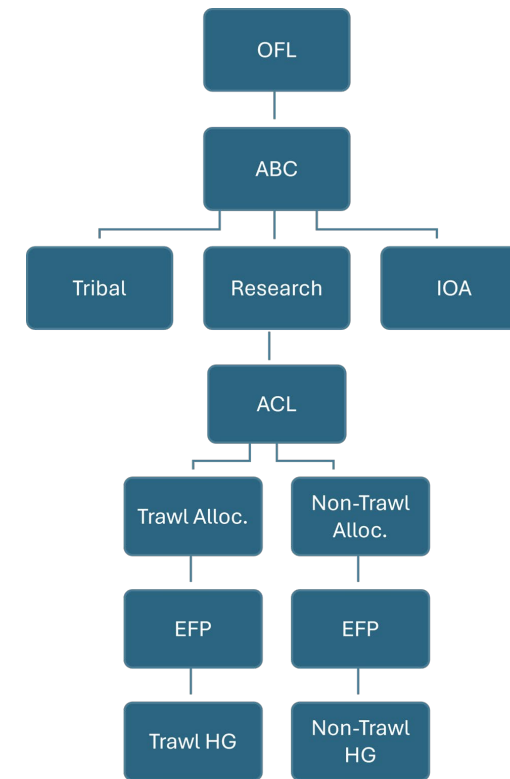


Alternatives

Alternative 1: All off ABC



Alternative 2: EFPs off Allocations



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)	Diff. (mt)
OFL	2000		OFL	2000	-
ABC	1800		ABC	1800	-
ACL	1800		Off-the-Top	72	
Off-the-Top	72		ACL	1728	-72
Fishery HG	1728		Fishery HG	1728	-
Trawl (95%)	1642		Trawl (95%)	1642	-
Non-Trawl(5%)	86		Non-Trawl(5%)	86	-

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 "off-the-tops" alone would not trigger ACL-exceedance accountability measures

	Status Quo Accounting (ACL<ABC) (mt)		Proposed Change to Off-the-Top Accounting (ACL<ABC) (mt)	Diff. (mt)
OFL	2000	OFL	2000	-
ABC	1800	ABC	1800	-
ACL	1500	Off-the-Top	72	-
Off-the-Top	72	ACL	1500	-
Fishery HG	1428	Fishery HG	1500	+72
Trawl (95%)	1357	Trawl (95%)	1425	+68
Non-Trawl(5%)	71	Non-Trawl(5%)	75	+4

Accounting for Off-the-Top Deductions Discussion

- All sources of mortality would continue to be accounted for
 - Increased uncertainty for IOA fisheries
- Benefits depend on alternative, with rebuilding stocks potentially seeing the most benefit
- Alt 2 similar to Alt 1- except that EFPs are taken off respective allocations
- Action alts align with MSA and EO 14276
- Indirect benefit- allow surplus carryover for all IFQ stocks

Harvest Specifications Frequency

Overview

- Amendment 17: Transition to biennial spex process (outlined in COP 9) from an annual process; three processes
 - Stock assessments
 - Harvest specifications/mgmt. measures
 - Stock definitions
- Other Councils and FMPs around the nation utilize a wide variety of harvest specification processes and timelines.
- Action alternatives: common feature is that harvest specifications (OFL/ABC) may be scheduled for a period longer than two years, based BSIA, such that only a subset of stocks with new information have revised harvest specifications each cycle and/or year

Biennial Specifications with Varying Specification Frequency (Alternative 2)

- Modify process to allow setting harvest specifications for a TBD period rather than 2 years
- Nothing would change except OFLs and ABCs could be set for longer period of time.
- Based on recent NEFMC action to increase mgmt. flexibility & improve consistency across FMPs

Harvest Specifications Frequency Discussion

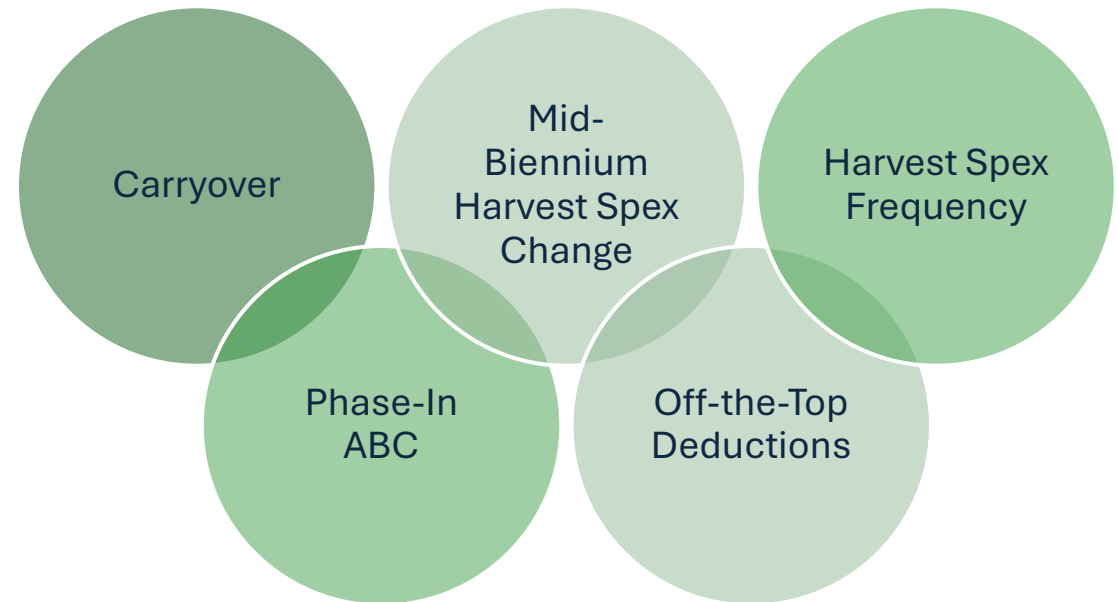
- Annual spex more responsive than No Action, but less stability potentially
- Both action alts result in higher upfront work, but could have long term savings

Synthesis

Supplemental Attachment 3

Overview

- Table 1: Key of trade-offs/consideration
- Non-exhaustive list (further considerations after ROA)



Carryover and...

Phase-In of ABC Changes

- ABC Carryover (Alt 1) and Phase-In potentially in conflict; increase uncertainty of overfishing
- ACL Carryover (Alt 2) possible with Phase-In

Mid-Biennium Harvest Specifications Change

- Green light changes OFL/ABC/ACL, Carryover only changes ABC/ACL
- Green light would consider recent mortality- Carryover ineligible

Accounting for Off-the-Top Deduction

- Accounting change doesn't change surplus available to fishery- items compatible
- Risk of overfishing likely increased, but able to be mitigated

Harvest Specifications Frequency

- Need to consider levels of attainment for harvest specification projection tables

Phase-In of ABC Changes and...

Mid-Biennium Harvest Specification Change

- Compatible
- Stock assessment would consider impacts from Phase-In

Accounting for Off-the-Top Deductions

- Potential risk in overfishing due to decreased buffer between OFL/ABC in phase-in

Harvest Specifications Frequency

- Compatible with either alternative
- Consider in projections

Mid-Biennium Change and...

Off-the-Top Deductions

- Compatible
- Only consideration is if not applied to all stocks

Harvest Specifications Frequency

- “Green light” and Annual Specifications (Alt 1) are incompatible

Off-the-Top Deductions and...

Harvest Specifications Frequency

- Timeline for setting off-the-top deductions need to be considered
- Likely need to frontload off-the-top deductions

Council Action

Adopt a Problem Statement, Range of Alternatives, and Preliminary Preferred Alternative, if Possible.