

GROUND FISH ADVISORY SUBPANEL REPORT ON TRAWL CATCH SHARE PROGRAM REVIEW

The Groundfish Advisory Subpanel (GAP) recommends the Pacific Fishery Management Council (Council) finalize the trawl catch share review document, including the initial diagnosis, as presented in [Agenda Item F.7, Attachment 1, November 2025](#). Additionally, the GAP reviewed the [Agenda Item F.7.a, Supplemental SSC Report 1, November 2025](#) and supports the recommendations for research and data needs, especially with regard to external vs. internal drivers of change, and the reasons behind low attainment rates. The [September GAP Report on Trawl Catch Share Program Review](#) discussed and highlighted in detail many issues related to the program and the review, and those points are not altered by the updated review document. The GAP appreciates the responses to September 2025 Council meeting recommendations in [Attachment 2](#) under this agenda item and the updates in the review document.

Regarding the diagnosis that was added for the November meeting, the GAP believes it covers the various internal and external factors impacting the success of the catch share program. Specifically, the program not meeting its economic goals and objectives seems to be due to a combination of factors and not specifically due to the catch share program itself.

For example, the shoreside processing sector are 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.” As noted in the [draft review](#), shorebased processors’ increased costs are contributing to lower revenues. The GAP appreciates the addition of Tables 103 and 104 that show *Revenue of Whiting and Non-whiting Processors by Production Type* and *Total Cost Net Revenue of Whiting and Non-whiting Processors by Production Type*, respectively. These tables help show a more complete picture of the problems processors are facing under the catch share program. They help illustrate some of the operational predicaments processors face, e.g., changing global market conditions and disrupted supply chains. However, processors note there is still a limit to what the data can show.

The report makes clear that processors have had to depend on the variability of other, seasonal, species to remain operational, and that the historical dependability of a year-round groundfish supply no longer exists. Regardless, this report demonstrates the need for follow-on actions that will help both shoreside processors and the trawlers that deliver to them. Changes to support a year-round groundfish season will help keep processors in local communities. This will additionally enhance their ability to process other species and provide year-round employment for more workers.

Based on the results of the review, initial diagnosis, and discussion by industry, the GAP provides the following conclusions:

1. The catch share program continues to meet the environmental goals and objectives of the program, including individual accountability of catch, environmental outcomes, sustainability, and safety.

2. The catch share program continues to fall short of its socio-economic goals, particularly in the bottom trawl sector, where under-attainment, low profitability, and high operating costs persist. Challenging markets, including declining ex-vessel non-whiting prices and rising inflationary pressures, have reduced year-round fishing effort, limited economies of scale, and further eroded profitability. These conditions have accelerated consolidation among both harvesters and processors and have negatively impacted coastal communities that rely on a stable and diverse fleet.

Based on these conclusions, the GAP sees primary program issues affecting program results to be contained in five categories:

- 1) Monitoring Costs and operational burdens – vessel observers, electronic monitoring, catch monitors
- 2) Cost recovery costs – Monitoring oversight, Economic Data Collection (EDC), other
- 3) Quota based restrictions – Carryover limitations
- 4) Adaptive Management Program (AMP) uncertainty – Could an alternative implementation of AMP improve socioeconomic outcomes?
- 5) Program complexity – EDC, declarations, mid-water exempted fishing permit

Regarding items 1 and 2, even seemingly small costs can be impactful, not only because profitability / viability is already challenging. For example, costs can be tipping points for bottom trawl vessels when deciding if and how many trips / targeting strategies in which to participate. Quota-based restrictions, including limitations on carryover, can impact over attainment on a vessel and fleet level. Development of AMP is likely to be contentious and time-consuming. It would be helpful to understand whether different uses of the AMP would be likely to improve the socio-economic outcomes of the program before going through the full exercise of developing it as a tool. Additional analysis on that point, e.g., whether redistribution of AMP to active participants would likely lead to greater effort and attainment, would be useful for the Council as it begins to develop follow-on actions in April. Finally, the catch shares program is likely one of the most complex fisheries management programs in the world, resulting in overly burdensome regulations and restrictions on participants that could be changed to promote flexibility and provide greater economic benefits.

While not a part of this action, the GAP sees primary broader Council issues that could affect program results to be contained in three categories. The GAP continues to believe that attention to these items could provide meaningful benefits to catch share participants and the groundfish fishery and communities as a whole:

- 6) Surveys & data collection – To better inform stock assessments.
- 7) Stock assessments – Some results from the past two assessment cycles have led to increased constraints which has, in turn, asked if there are processes, communications, and / or data streams that could be reviewed and modified.
- 8) Harvest specifications flexibility – There is potential opportunity to improve attainment and positively impact program goals and objectives.

The GAP sees primary non-Council issues that could impact program results to be contained in two categories:

- 9) Buyback and cost recovery – While cost recovery is mentioned above, the GAP sees that there are needed changes at the Federal level. For buyback, active groundfish participants continue to payback the loan, which is an additional cost outside of the catch share program.
- 10) Retaining Coastal Infrastructure – This is foundationally critical to long-term viability to have geographically dispersed processing centers and achieve program goals and objectives and national standards. There are many challenges in this regard related to regulations, cost increases, profitability, etc. to maintain what exists.

Many of the above issues were explored in detail in the [April 2025 “Trawl Catch Share Program Review Workshop Summary Supplemental Informational Report 3.”](#)

The review document is comprehensive in its scope and does an excellent job of illustrating the economic uncertainties of the industries involved in the catch share program. It is frustrating that so many of the factors causing these uncertainties are outside the Council's ability to affect change. The GAP would like to emphasize that the document in whole or in part would be useful in illuminating these economic challenges to anyone outside of the Council sphere who could then possibly affect change to improve the performance of the industry. The current state of the entire West Coast groundfish industry leaves a lot of room for growth, which, when evidenced through the review document to the right audience, could invite enhanced investment in infrastructure and market development to name a few.

PFMC

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