

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE REPORT ON HIGHLY MIGRATORY SPECIES TRIP LIMIT FLEXIBILITY AND MODIFIED IF/THEN SCENARIOS

The California Department of Fish and Wildlife (CDFW) reviewed the Council Staff Report on trip limit flexibility and modified If/Then scenarios for Pacific bluefin tuna (Staff Report, [Agenda Item I.1 Attachment 1, September 2026](#)). The Staff Report provides recommendations for potential modifications to Pacific bluefin (PBF) tuna trip limits, to allow for larger trip limits if there is a significant underutilization of the U.S. catch limit and/or to modify trip limit reduction trigger point calculation. In this report, CDFW provides additional information and recommends:

- that no action be taken to make changes to the trip limits presently in place;
- that no selection of a purpose and need statement or range of alternatives occur;
- that future discussions of new if/then statements be addressed under special projects agenda items and that PBF trip limits be discussed under the regular biennial harvest specifications (bi-spex) process.

Trip Limit History

It is important to consider the present PBF trip limits in context of how and why they were developed. The initial effort to establish highly restrictive trip limits followed the 2017 fishing season, where the annual PBF quota was exceeded. The details of that event were included in a joint CDFW - National Marine Fisheries Service (NMFS) report ([Agenda Item J.3.a, Supplemental CDFW-NMFS Report 1, September 2017](#)). At that time, NMFS had established a 25 metric ton (mt) trip limit until catch was within 50 mt of the annual quota (i.e., 375 mt in 2017), at which point a 2 mt trip limit would be imposed. From 2011 to 2014 (prior to implementing a 25 mt trip limit in 2015), the average catch of PBF by a coastal purse seine vessel was about 30 mt per trip.

From January 1 through August 12, 2017, there were only five commercial landings that exceeded 20 mt and preliminary landings were approximately 208 mt (49% of the annual catch limit). On August 11, 2017, CDFW and NMFS prepared to issue notice that the catch limit would be reduced to 2 mt per trip as soon as 375 mt were caught. Between August 13 and August 18 an additional 270 mt were landed, including 9 landings that exceeded 20 mt. These landings not only surpassed 375 mt but exceeded the 425 mt annual quota.

As a result of the exceedance in 2017 and the limited catch remaining in the internationally negotiated biennial limit, the Council recommended and NMFS established a 1 mt catch limit for 2018 until the annual limit was met (with the exception of Drift Gillnet vessels, which were allowed a 2 mt trip limit). Following this, as noted in the Staff Report, the Council recommended, and NMFS adopted initial PBF trip limits of 15 mt in 2019 and 2020, then 20 mt in 2021, and 30 mt in 2022 through 2024. During Council floor and Advisory Body discussions throughout that timeframe, it became apparent that even the 30 mt trip limit, which was higher than the pre-2017 trip limit of 25 mt, was insufficient to incentivize purse seine effort on the increasing stock.

As such, and after significant deliberation, the Council recommended adopting the current trip limit scenario, which begins with a relatively large initial trip limit of 60 mt, that decreases if catches reach specific levels (trigger points), with both trip limits and trigger points changing depending on how far into the season the varying trigger points are reached. The existing process is already an “if/then” scenario. This process was not only recommended by the Council, but supported by direct input from the Highly Migratory Species Management Team and Advisory Subpanel ([Agenda Item H.2.a, Supplemental HMSMT Report 1, November 2024](#) and [Agenda Item H.2.a, Supplemental HMSAS Report 1, November 2024](#)) even though an alternative with a higher initial trip limit was considered. In fact, the Advisory Subpanel recommended that the limits should be low enough to allow for more trips throughout the season, rather than higher limits which would provide less opportunity.

2026 Pacific Bluefin Tuna Catch Data

Contrary to the hypothetical assumption in the Staff Report, and as evidenced by the annual limit exceedance in 2017 despite a 25 mt trip limit, when PBF are readily available in aggregations large enough for purse seine vessels to target and markets are interested in purchasing fish, trip limits are not an adequate control on decisions for vessels to target PBF. Strict trip limits, which are reduced as the annual limit is approached, are necessary to ensure both that the annual limits are not exceeded and that fish remain available for incidental catch in smaller scale fisheries.

While the annual limits have not been achieved in the past 8 years, there has also been a limited market for purse seine-caught PBF which has not commanded as high of a price per pound as other common seine targets, like market squid. While there are a few anecdotal reports that PBF schools were too large for seiners to wrap due to the trip limits over the last eight years, these were mostly received during earlier years, and the more recent failure to utilize the quota appears to be tied more to market dynamics than trip limits. 2026 has already seen a significant increase in larger catches and targeting of PBF by the purse seine fleet. In the single week between August 23 and August 30, 2026 approximately 202 mt were landed in two large and four smaller purse seine trips. This level of effort is consistent with what was seen in 2017 and with the amount of PBF present in Southern California waters this year. As of September 17, 2026, 671 mt of PBF accounting for more than 52% of the annual catch limit, have been landed.

Regulatory Context

It is also important to consider the regulatory context for establishing PBF catch limits. PBF trip limit regulations are created under the Tuna Conventions Act, not the Magnuson Stevens Act (MSA). Special Project 1 was established through funding to respond to [Executive Order 14276](#)'s to seek “...innovative ideas to improve fisheries management and science within the requirements of the Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. 1801 et seq.); the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq.); the Marine Mammal Protection Act (16 U.S.C. 1361 et seq.); and other applicable laws.” It is unclear whether changes to regulations created under the Tuna Conventions Act would even apply to the Executive Order's goals. Regardless, any changes to the PBF limits would likely not be implemented until the 2027-2028 management measures are in place.

Higher initial limits, or limits that increase beyond 60 mt per trip, run the significant risk of having the annual limit exceeded in a very short timeframe. At 60 mt, the entire current annual limit could be achieved in just over 21 trips. Increasing it to a 75 mt limit would reduce that to just over 17 trips. Between August 13 and August 18, 2017, when the annual limit was exceeded, 32 purse seine trips landed PBF.

Conclusion

Based on the above information, CDFW does not recommend any changes to the Pacific bluefin tuna trip limits at this time. As noted above, the existing PBF trip limit regulations are already if/then statements and changes should not be considered under Special Project 1's if/then exercise, but rather serve as an example of management approaches that could be applied elsewhere. We do not support establishing a purpose and need or a range of alternatives as this would be redundant to significant past analyses and discussions on the topic. We recommend that further exploration of new if/then statements for HMS management be focused on a different aspect of HMS fishing regulations. We also recommend that future discussions of if/then statements, regardless of FMP species, be held under the special projects agenda items to appropriately frame them within the context of their purpose. Discussions of PBF trip limit changes are more appropriately held within the normal Bi-spex process.

PFMC
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