

Highly Migratory Species Trip Limit Flexibility and Modified If/Then Scenarios

Introduction/background

Special Project 1, Adaptive Management and Flexibility, is one of three projects for which the Pacific Fishery Management Council (Council) received dedicated funding as part of the Inflation Reduction Act. The project's objective is to identify innovations that make review and implementation of Council actions more timely, efficient, and responsive to a changing ocean environment and other unexpected events. At its September 2025 meeting, the Council identified three priority areas to advance under this project and directed staff to develop plans for their implementation. One priority area is "If-then" statements and inseason management actions for Fishery Management Plans (FMPs) where they make sense to allow for action to happen outside of a Council meeting.

Council Advisory Bodies were asked to generate ideas for "If-then" candidate projects, and at the April 2026 Council meeting, the HMSAS (H.1.a Supplemental [HMSAS Report 1](#)) recommended consideration of modified Pacific bluefin tuna (PBF) trip limits to allow for larger trip limits if there is a significant underutilization of the U.S. catch limit. The HMSAS stated concerns that "far too often, management results in restrictions or closures – 'Red lights'" – and instead recommended establishing increased or expanded opportunities through the use of "Green lights." The HMSAS briefly described it as:

"This would involve a rule that would increase the initial¹ trip limit for PBF if there is a significant underutilization of the U.S. catch limit later in the year. It could state, if total commercial catch of PBF is below X, then NMFS will increase the initial trip limit¹ to Y. Other management triggers included in the regulations would remain in effect and be implemented when catch levels meet those triggers."

The Council tasked ABs with continuing to consider opportunities relative to If-then statements and/or new inseason management actions and prioritized the Groundfish and Highly Migratory Species FMPs for this exploration. ([April 2026 DSD](#)).

While the current PBF regulations include inseason changes to *reduce* trip limits when catches approach the annual (or biennial) catch limit, there is no provision for inseason increases to the initial trip limit when the fishery is projected to fall short of full attainment of the annual (or biennial) catch limits.

History

Pacific bluefin tuna regulation and trip limits

U.S. domestic highly migratory species (HMS) fishing regulations are implemented via the Tuna Conventions Act (TCA) ([50 CFR 300 Subpart C](#)) and the Magnuson-Stevens Fishery Conservation and Management Act (MSA) ([50 CFR 660 Subpart K](#)). Under the TCA, the National Marine

¹ This refers to in-season changes that would modify that year's initial trip limit. This does not imply changes to the subsequent year's initial trip limit.

Fisheries Service (NMFS) promulgates regulations to implement fisheries management agreements (including biennial PBF catch limits) negotiated at the Inter-American Tropical Tuna Commission (IATTC), of which the U.S. is a party. The PBF domestic trip limits are also spelled out in the TCA regulations. Under the MSA, the Council develops domestic HMS fishery management regulations as described in the HMS FMP for commercial and recreational HMS fishing and transmits those recommendations to NMFS for implementation.

PBF trip limits have been included in PBF regulations (implemented under the TCA) since [2015](#) and were developed when the PBF stock was in an overfished status. PBF has since been rebuilt and surpassed the second rebuilding target ($20\%SSB_{F=0}$) in 2021. Inseason trip limit reductions have been included as a part of the PBF trip limit design and were triggered twice: once in 2019 (subsequently reversed) and in 2022.

The approach of making in-season reductions to trip limits has been in place since 2015 and has been modified several times since then. The current approach of multiple inseason triggers began in the latter part of 2022 ([Final Rule](#)). Most recently, the Council supported a revised trip limit design at the November 2024 Council meeting. The Council considered four options proposed by NMFS: Running Start, Run Down the Middle, Pedal to the Floor, and Status Quo. These are described in Agenda Item [H.2.a NMFS Report 1](#) (November 2024). The table with those proposed trip limits is included as Appendix 1 here. and were developed to ensure the range of trip limits would be broad enough to encompass multiple potential options, with the high-end option being reasonably likely to attain the two-year quota. NMFS developed a proposed rule to implement PBF catch limits and trip limits.

Appendix 1 shows the trip limit table for the four options considered in November 2024 and the “Reduction Points” - the levels of estimated landings which trigger NMFS to reduce the trip limits inseason. The corresponding “Buffer” amounts indicate how much of the annual or biennial limit remains after each reduction. The proposed trip limit options were designed to satisfy U.S. obligations as members of the IATTC, to provide opportunity to multiple types of PBF fishing vessels, to avoid regulatory discards to the extent possible, and to offer opportunity to achieve full utilization of catch limits.

The Council recommended and NMFS adopted the “Run Down the Middle” option:

January - June:

- Initial trip limit = 60 mt
- The trip limit reduces to 40 mt once total catch is within 400 mt of the annual limit.
- The trip limit reduces to 5 mt once total catch is within 225 mt of the annual limit.

July - September:

- The trip limit reduces to 40 mt once catch is within 300 mt of the annual limit.
- The trip limit reduces to 5 mt once total catch is within 175 mt of the annual limit.

October - December:

- The trip limit reduces to 40 mt once catch is within 200 mt of the annual limit.
- The trip limit reduces to 5 mt once total catch is within 125 mt of the annual limit.

In the past, the majority of PBF landings have been from coastal purse seine vessels, with smaller amounts caught by commercial hook-and-line, drift gillnet, and other gear types. Higher initial trip limits allow purse seiners to catch more PBF on each trip but may reduce the number of individual trips that can be taken before the limits are reduced. In addition, part of the intent of these trip limits is to ensure the fishery remains open to the vessels harvesting smaller amounts than the purse seine fleet. 2026 has seen over 400 mt of PBF landed by the purse seine fleet. However, there was little apparent purse seine effort in 2024 and 2025 (Table 1).

Purpose and Need

The purpose of this action would be to increase harvest of PBF, to better attain annual catch limits. The PBF stock was rebuilt faster than expected and the PBF harvest has fallen short of what is allowed. The need for this action would be to achieve optimum yield and to accomplish the goal of increasing domestic seafood production, as called for in the 2025 [Executive Order 14276: Restoring American Seafood Competitiveness](#) as well as the 2020 [Executive Order 13921: Promoting American Seafood Competitiveness and Economic Growth](#). In addition, increasing Pacific bluefin tuna trip limits to provide greater likelihood of attaining the U.S. catch limit is consistent with National Standard 1 of the MSA, which calls for preventing overfishing while achieving, on a continuing basis, optimum yield from the fishery. Table 1 shows PBF commercial catch limits, commercial landings (total and for the purse seine fleet), and percent attainment of catch limits. Although many factors can affect attainment of catch limits, only once in the years 2015-2025 was there full catch limit attainment.

Options/alternatives

Range of analysis

NMFS developed a [Programmatic Environmental Assessment](#) (PEA) that analyzed the range of catch limits and trip limits. Alternative 1 assumed range of catch limits and included sub options for trip limit scenarios:

Range of U.S. commercial catch limits (established by IATTC):	50 – 1,500 mt/year (100 – 3,000 mt/biennium)
Range of initial trip limits:	30 mt – 75 mt
Range of all trip limits:	2 mt – 75 mt

Alternative 2 of the PEA considered a range of catch limits of between 1,500 and 10,000 mt per year (3,000 - 20,000 mt/biennium). These higher catch limits would only be implemented if established in a future IATTC resolution. Alternative 2 includes the same trip limit sub options described under Alternative 1 and notes that the trip limits and buffer points would likely be adjusted to ensure utilization of the harvest limits and to ensure access for different gear types.

Options within the range of analyzed alternatives

Several alternative trip limit options could address the HMSAS recommendation to increase trip limits when catch remains below the applicable trigger. These options would fall within the range of alternatives previously analyzed in the PEA. In addition to a simple modification of the current

trip limits that would be commensurate with the biennial catch limits adopted by the IATTC, the Council and NMFS may wish to consider additional options and sub options.

Option 1: Status Quo. This would maintain the existing Run Down the Middle trip limits and would not include the possibility of trip limits greater than 60 mt.

Option 2: Maintain the existing trip limit reduction triggers under the Run Down the Middle option, with added triggers to allow for increased trip limits in certain circumstances (i.e., the annual or biennial catch limits are not projected to be met). For example:

January - June:

- The trip limit reduces to 40 mt once total catch is within 400 mt of the annual limit.
- The trip limit reduces to 5 mt once total catch is within 225 mt of the annual limit.

July - September:

- *The trip limit is increased to 75 mt if total catch is not within 600 mt of the annual limit*
- The trip limit reduces to 40 mt once catch is within 300 mt of the annual limit.
- The trip limit reduces to 5 mt once total catch is within 175 mt of the annual limit.

October - December:

- *The trip limit is increased to 70 mt if total catch is not within 400 mt of the annual limit*
- The trip limit reduces to 40 mt once catch is within 200 mt of the annual limit.
- The trip limit reduces to 5 mt once total catch is within 125 mt of the annual limit.

Option 3: Select the Pedal to the Floor option. This would allow for greater initial trip limits but would still include trip limit reductions as the catch approaches the annual or biennial catch limits. This option is the last column in Appendix 1.

Sub Option: Durable Trip Limit Design: This sub option would establish a percentage-based formula in regulation that would allow for biennial trip limit modifications based on the IATTC-adopted catch limits. Once the Federal Regulations are established, NMFS would issue Federal Register Notices rather than promulgating new regulations in the Code of Federal Regulations every two years. This design could be applied to any of the trip limit options considered and analyzed in the PDEA. For example:

January - June:

- The trip limit reduces to 40 mt once total catch is within 31% of the annual limit.
- The trip limit reduces to 5 mt once total catch is within 18% of the annual limit.

July - September:

- The trip limit reduces to 40 mt once catch is within 23% of the annual limit.
- The trip limit reduces to 5 mt once total catch is within 14% of the annual limit.

October - December:

- The trip limit reduces to 40 mt once catch is within 16% of the annual limit.
- The trip limit reduces to 5 mt once total catch is within 10% of the annual limit.

Fishing choices and historical landings

Commercial PBF landings have fluctuated over time and landings are dominated by the purse seine fleet (Table 1). Purse seine vessels have averaged approximately 29 mt per trip compared to all other gear types (primarily harvested by hook and line vessels), which average 0.25 mt per trip historically, even under higher trip limits. However, purse seine vessels are somewhat versatile and can switch target species, nets, and locations, depending on numerous factors. One obvious factor is the allowable catch limit in a given year and how rapidly the allowable catch is landed throughout the year. If PBF landings are accumulating rapidly against the annual limit, trip limits may be reduced via inseason action. Hypothetically, even if trip limits were not reduced, the catch rate could be enough to deter further targeting of the remaining PBF catch limit. A captain would need to weigh the costs versus benefits in such a scenario, as well as potential lost opportunity in other fisheries.

In addition to the amount of PBF still available within a given year's catch limit, PBF are highly mobile and at times are simply not present in close enough proximity to make it worth pursuing. In some cases, the size composition or other qualities of the fish themselves may not be desirable enough to make it worth targeting PBF.

Another consideration is variability in markets and ex-vessel prices for different species. U.S. purse seiners may preferably target other species that are more valuable and/or more economical to harvest. Market conditions including price, supply, tariffs, and foreign competition can affect fishing choices.

Because of these multiple factors affecting fishing choices, it is difficult to predict or model fishing based on past behavior. One conclusion of the trip limit attainments in Table 2 could be that there's no need for increased trip limits because the fleet already isn't attaining full trip limits. However, it's not unrealistic that the volume of PBF a purse seiner needs for a profitable trip is larger than what the current allowable trip limit may be. The relatively low ex-vessel price per pound for PBF means that a higher volume may be needed to make a fishing trip financially worthwhile.

Table 1: Pacific Bluefin Tuna U.S. Commercial Limits and Landings Data (PacFIN data, August 2026)

Year	U.S. Commercial Limit (mt)	Total Landings (rd. wt. mt)	Percent Attainment (Total Landings)	Purse Seine Landings (rd wt mt)
2026	1,285	496	39%	466.4*
2025	1,285	118	9%	***
2024	720	135	19%	0
2023	720	192	27%	***
2022	523	368	70%	197.92
2021	425	217	51%	***
2020	356	231	65%	***
2019	425	274	64%	226.11
2018	114	65	57%	11.53

2017	425	486	114%	466.43
2016	425	356	84%	315.72
2015	425	98	23%	86.43

*All commercial landings as of 8/25/2026

*** Data withheld for confidentiality purposes

Trip limit attainment

Table 2 below shows trip limits by year and the number of purse seine vessels that participated each year from 2015-2026. Due to confidentiality, the attainment column is grouped by years with the same initial trip limit (e.g., vessels are counted across 2015 to 2017 when the trip limit was 25 mt). The number of distinct purse seine vessels active during the trip limit period is provided for context. Note that vessels could be counted in both attainment columns as the vessel could have had one trip with a higher (>50%) trip limit attainment and another trip in the same year (or time period) with a lower (<50%) trip limit attainment. In other words, from 2015-2017, there were 8 distinct purse seine vessels that landed PBF. Seven of the eight vessels landed less than 50 percent of the 25 mt trip limit on at least one trip over the time period and seven of the eight vessels landed more than 50 percent on at least one trip over the time period.

Table 2: Purse Seine Vessel Participation and Attainment of Trip Limit, 2015-2026. “c” denotes confidential strata.

Year	Initial Trip Limit (mt)	Total Purse Seine Vessels	Distinct Purse Seine Vessels over Trip Limit period	Number of Vessels With:	
				0-50% Attainment of Trip Limit	51-100% Attainment of Trip Limit
2015	25	5	8	7	7
2016	25	5			
2017	25	8			
2018	1	8	8	4	7
2019 *	15	9	9	5	9
2020	15	6			
2021	20	3	3	c	c
2022 *	30	8	8	8	c
2023	30	1			
2024	30	0			
2025	60	2	8	7	3
2026	60	7			

*Inseason trip limit reductions happened in 2019 (subsequently reversed) and 2022, trip limit attainments were based on original trip limits shown in the trip limit column and therefore may be an underestimate of the attainment.

Table 2 shows numerous vessels attained over 50 percent of trip limits at some point over the time series. Notably, three out of 8 vessels achieved over 50 percent attainment on at least one trip even with the larger 60 mt initial trip limit. One concern with higher initial trip limits (e.g., 75 mt) is

that the annual catch limit (not to exceed 1,285 mt for the current biennium) could theoretically be landed in 17 vessel trips if every trip by every purse seine vessel caught the trip limit (not including any additional harvest by other gear types). The number of vessel trips by purse seine vessels has ranged from 0 trips (2024) up to 27 trips (2017). There are currently only 16 vessels authorized for purse seine gear to fish for tunas in the Eastern Pacific Ocean.

Next Steps

In developing this document, we note that there was insufficient time and capacity for Council staff to partner with NMFS on developing a detailed analysis of these options (which is what we could have done in a normal process under the ROA). Council staff believes we could further develop the analysis to support Council action, including developing a trip limit model to project catches under the various scenarios with the assistance of the NMFS and the HMSMT.

Biennial harvest limits for PBF are expected to be agreed upon by the IATTC in September 2026 and consideration of an updated trip limit design at the November 2026 Council meeting is possible. Depending on timing and capacity NMFS may then be able to issue regulations with biennial harvest limits and an updated trip limit design for the 2027 – 2028 biennium. The options described in this report would need to be refined and further evaluated. The sub option describing a percentage-based approach would require substantial additional consideration to determine feasibility and details of how it would be implemented.

PFMC
8/28/2026

Appendix 1: Trip Limit Table (November 2024 NMFS Report 1)

		Status Quo	Running Start	Run Down the Middle	Pedal to the Floor
2025	Annual Limit	1,285 mt	1,285 mt	1,285 mt	1,285 mt
	Initial Trip Limit	30 mt	50 mt	60 mt	75 mt
	First Reduction Point: if total catch is...	> 985 mt	> 985 mt	> 985 mt	> 885 mt
	<i>Buffer amount:</i>	<i>300 mt</i>	<i>300 mt</i>	<i>300 mt</i>	<i>400 mt</i>
	First Reduced Trip Limit	20 mt	25 mt	40 mt	50 mt
	Second Reduction Point: if total catch is	> 1,185 mt	> 1,185 mt	> 1,085 mt	> 1,085 mt
	<i>Buffer amount:</i>	<i>100 mt</i>	<i>100 mt</i>	<i>200 mt</i>	<i>200 mt</i>
	Second Reduced Trip Limit	3 mt	5 mt	5 mt	5 mt
2026	Annual Limit*	537 mt+	537 mt+	537 mt+	537 mt+
	Initial Trip Limit	30 mt	50 mt	60 mt	75 mt
	First Reduction Point: if total catch is...	> 1,522 mt (<i>biennial total</i>)	> 985 mt (<i>single year</i>), or > 1,522 mt (<i>biennial total</i>)	> 985 mt (<i>single year</i>), or > 1,522 mt (<i>biennial total</i>)	> 985 mt (<i>single year</i>), or > 1,522 mt (<i>biennial total</i>)
	<i>Buffer amount:</i>	<i>300 mt</i>	<i>300 mt</i>	<i>300 mt</i>	<i>300 mt</i>
	First Reduced Trip Limit	20 mt	25 mt	40 mt	50 mt
	Second Reduction Point: if total catch is...	> 1,722 mt (<i>biennial total</i>)	> 1,185 mt (<i>single year</i>), or > 1,722 mt (<i>biennial total</i>)	> 1,185 mt (<i>single year</i>), or > 1,722 mt (<i>biennial total</i>)	> 1,185 mt (<i>single year</i>), or > 1,722 mt (<i>biennial total</i>)
	<i>Buffer amount:</i>	<i>100 mt</i>	<i>100 mt</i>	<i>100 mt</i>	<i>100 mt</i>
	Second Reduced Trip Limit	3 mt	5 mt	5 mt	5 mt