Ad Hoc Fisheries Innovation Workgroup
HMS Roadmap: Exempted Fishing Permits Goals and Metrics

Pacific Fishery Management Council
Monday, November 17

Items to be Covered

- FIW work plan status update
- Key FIW tasks:
  - EFP guidance materials
  - EFP performance goal
  - EFP performance metrics and benchmarks - economic viability
  - EFP performance metrics and benchmarks - bycatch
- Summary of requests for the Council

FIW's Charge

- Modification of Council Operating Procedure 20 – HMS Exempted Fishing Permit (EFP) process.

- Improvement of HMS EFP guidance.

- Development of HMS EFP performance goals (including acceptable bycatch) and metrics to evaluate EFP performance.

- Consideration of the National Seafood Strategy as it pertains to HMS fisheries.

- Review of the draft HMS Roadmap, as appropriate.

- Discussion of relevant innovative fishery tools or measures needed to support a robust HMS fishery.

FIW's Work Plan Outline (as Adopted by the Council)

Categories/Objectives		Deliverable Timing
EFP process and timing (limited to a few key topics on COP 20)		September 2025
EFP process and timing (for issues not addressed in the first round of proposed revisions)		March/April 2026
EFP applications (Council requested contents and review criteria)		March/April 2026
EFP guidance		June 2026
EFP evaluation	Reporting	March/April 2026
	Performance goals/metrics	Check-in with the Council in November 2025 (draft performance goals/metrics); final deliverable submitted in March/April 2026
Other (non-COP 20 related) ideas to support facilitate EFPs		Ongoing/as needed
Review the draft HMS Roadmap		A clean version is included in the November briefing book
National Seafood Strategy alignment		Ongoing collaboration between NMFS and the Council
Discuss relevant innovative fishery tools or measures to support a robust HMS fishery		June 2026

Year at a Glance 2025/2026 (Updated)

Indicates a Council meeting that month

June | July | Aug | Sept | Oct | Nov | Dec | Jan | Feb | Mar | Apri | May | June

Ongoing tasks: Additional (non-COP 20) ideas/recommendations for the Council to support EFPs; collaboration with NMFS on NSS alignment

Tier 1 Tasks: EFP process and timing (Sept 2025)



Tier 1/2/3 Tasks: EFP process and timing (for issues not addressed in the first round of proposed revisions) (March/April 2026); EFP applications (March/April 2026); EFP evaluation - performance goals and metrics (check-in with the Council in November 2025; final deliverables submitted in March/April 2026); EFP guidance (originally June 2026; now March/April 2026)

Tier 2/3 Tasks: EFP evaluation - reporting (March/April 2026)

Tier 3 Tasks: Innovative tools or measures (June 2026)

EFP Application Guidance

- Draft voluntary “questionnaire” in development by NMFS
  - Designed to help prospective EFP applicants understand the information requirements for NMFS’s review process. The FIW has reviewed and is providing input to NMFS.
- Other materials discussed:
  - Sample permits (recently made available on the NMFS West Coast HMS EFP website)
  - Infographics (such as flowcharts)
  - Checklists
- Next steps:
  - Council staff to work with NMFS to develop priority items for FIW review

Terminology for EFP Evaluation Components

- The performance goal is the overall objective we want to achieve.
- The performance metrics are the ways we are measuring progress towards our goal (i.e., the forms of measurement).
- Benchmarks provide useful points of comparison and context.
  - They are NOT goals or targets to be achieved (i.e., failure to meet them has no regulatory consequences for EFPs).
  - Every year, the lead(s) for evaluation could report on whether the EFPs results were higher, on par, or lower as compared to the defined benchmark.

Performance Goal Options:

Option 1 - preferred

HMS Roadmap Goal B (verbatim) - “Support and test fishing practices that have the potential to be economically viable and consistent with National Standard 9 guidelines.”

Option 2

Language that is more tailored to EFP fishing - “The fishing gear/method used in the EFP is economically viable and meets acceptable levels of bycatch/bycatch mortality.”

Summary of EFP Performance Metrics

Category	Performance Metric
Economic Viability	Economic viability views through survey responses with EFP holders (to also collect operating cost data)
Economic Viability	● Ex-vessel revenue ● CPUE ● Ex-vessel price per pound
Bycatch	Discard rate
Bycatch	● Individual counts of bycatch ● Individual bycatch-to-catch ratios

Performance Metrics and Defined Benchmarks

Category	Performance Metric	Benchmark
Economic Viability (Qualitative)	Economic viability views through survey responses with EFP holders (to also collect operating cost data)	N/A
Economic Viability (Quantitative)	Ex-vessel price per pound	Three options considered
	CPUE	Three options considered
	Ex-vessel revenue	Three options considered
Bycatch (Quantitative)	Discard rate	Four options considered
Bycatch (Quantitative)	• Individual counts of bycatch • Individual bycatch-to-catch ratios	TBD - pending final list

Individual Economic Viability - Draft Survey Questions

Economic viability:

- Did you find this gear/method profitable?
- Would you continue to fish using this gear/method if allowed?
- Would this gear/method be viable as your sole fishing method?
- Would this gear/method be valuable as an addition to your portfolio of fishing activities?
- If you didn't find this gear/method profitable, what adaptations could improve viability (location, bait, depth, etc.)?

Provide the average costs per trip for:

- Fuel and price per gallon
- Bait
- Light sticks
- Ice costs
- Grocery expenses
- Other trip costs (please specify)
- Labor costs

Other info:

- Number of crew per trip (on average)
- Number of trips
- Total number days at sea

Performance Metrics and Benchmarks

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Defining Benchmarks Quantitatively

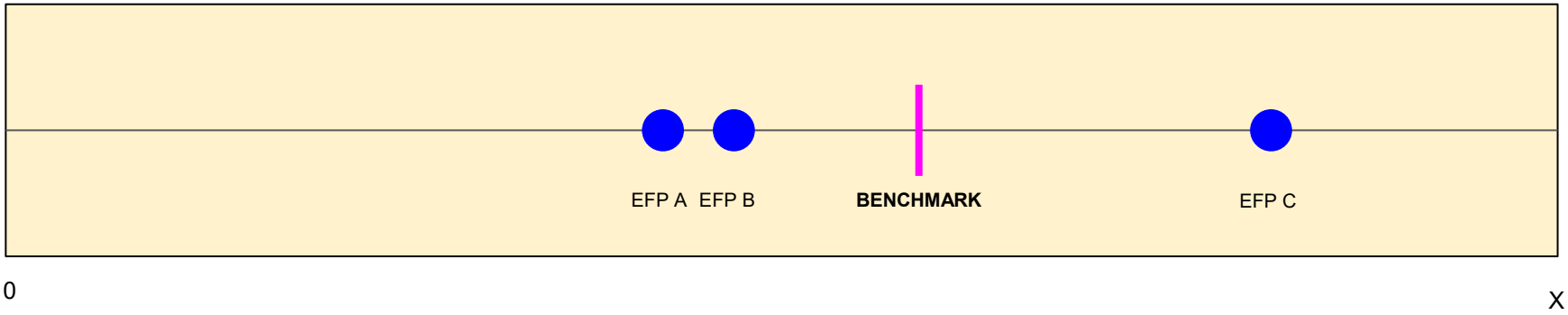
Approach 1 - Choose ***one value*** calculated from several fisheries that will serve as a point of comparison.

Approach 2 - Create ***an index of values*** calculated from various fisheries that will serve as points of comparison.

Approach 3 - Choose **one value** (or more) now ***AND*** recommend the development of an **index**.

FIW's preliminary preferred approach - Calculate a ***couple of values*** using the averages from specific fisheries.

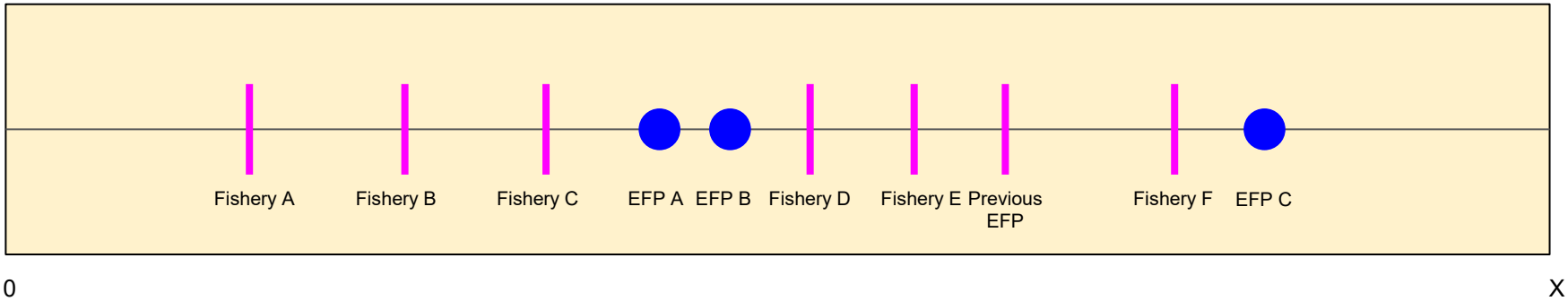
Approach 1 - Calculate One Value from a Broad Range of Fisheries (Hypothetical)



Result from individual EFP

Defined benchmark

Approach 2 - Developing a Range of Values for Comparison (Hypothetical)



- Result from individual EFPs
- Data from other HMS fisheries and previous EFPs

Developing an Index: U.S. Air Quality Index Example

Long Beach

California

Moderate · 80 (U.S. Air Quality Index)

0 50 100 150 200 300 500

Updated 26 min ago

Air quality is acceptable. However, there may be a risk for some people, particularly those who are unusually sensitive to air pollution.

About air quality info



Fishery/EFP Datasets Considered for Calculations or an Index

West Coast HMS Fisheries:

- West Coast Large- Mesh Drift Gillnet Fishery
- West Coast Deep Set Longline Outside of the EEZ
- West Coast Deep Set Buoy Gear Fishery
- West Coast Harpoon Fishery

Previous EFPs:

- EFP Data for Shallow Set Longline and Deep Set Longline in the U.S. West Coast EEZ
- EFP Data for Deep-set Linked Buoy Gear

Other HMS Fisheries:

- Atlantic/Gulf of Mexico Pelagic Longline Fishery
- Hawaii Deep Set Longline and Shallow Set Longline Fisheries

Performance Metrics and Benchmarks

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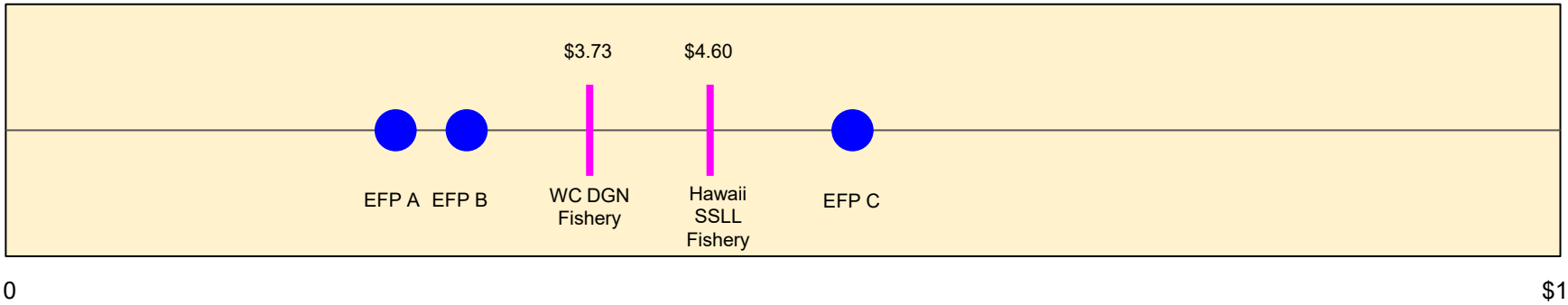
Economic Viability Benchmarks - Summary

Performance Metric	Total # of Benchmarks	Species	Fisheries datasets	Time Horizon
Ex-vessel price per pound	6	Swordfish	Hawaii shallow-set longline and WC DGN	10-year average
		Bluefin tuna	Bluefin hook-and-line fishery and WC DGN	5-year average
		All HMS landings	Hawaii shallow-set longline and WC DGN	10-year average
CPUE	4	Swordfish	Hawaii shallow-set longline and WC DGN	10-year average
		All HMS landings	Hawaii shallow-set longline and WC DGN	10-year average
Ex-vessel revenue	7	All landings	All authorized WC HMS fisheries and Hawaii shallow-set longline	10-year average

<u>The FIW is recommending to keep it simple and understandable:</u>

- Assess against things that NMFS, the Council (including Advisory Bodies), fishermen, and stakeholders all understand
- Don’t make overly complex benchmarks that need a lot of NMFS capacity to establish (unless justified)
- Use time horizons that reflect recent conditions (market & environmental) and can account for year-to-year variability
- For ex-vessel revenue: high volume + “all authorized WC HMS” approach allowing for broader comparison

Example of Applying Benchmarks - Average Price per Pound from All HMS Landings



● Hypothetical results from individual EFPs

| Calculated using 10-year averages from 2014 - 2023 (inflation adjusted)

*Scale is not exact (for illustration purposes only); final calculations are to be determined.

Performance Metrics and Benchmarks

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	CPUE	Three options considered
	Ex-vessel revenue	Three options considered
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Bycatch (Quantitative)	● Individual counts of bycatch ● Individual bycatch-to-catch ratios	TBD - pending final list

Bycatch Benchmarks - Summary

Performance Metric	Total # of Benchmarks	Fisheries datasets	Time Horizon
Discard rate *(exact formula TBD)*	2	Hawaii shallow-set longline and WC DGN	10-year average
Individual species-level counts of bycatch	TBD - pending final list of priority bycatch species		
Individual species bycatch-to-catch ratios			

The FIW is recommending to keep it simple and understandable:

- Assess against things that NMFS, the Council (including Advisory Bodies), fishermen, and stakeholders all understand
- Don't make overly complex benchmarks that need a lot of NMFS capacity to establish (unless justified)
- Use time horizons that generally reflect recent conditions (market & environmental) and account for year-to-year variability

Individual Species Bycatch Benchmarks

Two Metrics:

- Individual counts of bycatch
- Bycatch-to-catch ratios

Bycatch List:

- *Option 1* - Use the existing list of prioritized bycatch species
- *Option 2* - Use the approved list as a starting point and make adjustments based on defined criteria (removals/additions)

Datasets in the “Longline-Type” EFP FEIS Used to Compare Bycatch Species Composition

Fishery	Data Set
Hawaii longline	2004-2019 Observer Dataset for Hawaii DSLL and SSLL East of 140˚ West Longitude
West Coast DSLL operating outside the EEZ	2019 and 2020 Observer Data for West Coast DSLL Outside of the EEZ East of 140˚ West Longitude
2019 West Coast longline EFP	2019 EFP Observer Dataset for SSLL and DSLL in the U.S. West Coast EEZ

Current list of priority bycatch species (Option 1)

Finfish
Striped marlin
Black marlin
Blue marlin
Billfish (other)
Billfilsh (unidentified)
Sailfish
Sharks/Rays
White shark
Basking shark
Megamouth shark
Giant manta ray
Marine Mammals
Bottlenose dolphin
Risso's dolphin
Common dolphin (long-beaked and short-beaked)
Northern right whale dolphin
Pacific white-sided dolphin
Fin whale
Humpback whale
Gray whale
Short-finned pilot whale
Minke whale
Sperm whale
Sea Turtles
Leatherback turtle
Loggerhead turtle
Olive ridley turtle
Green turtle

Red = to be considered for removal (did not appear in FEIS datasets)

Finfish
Striped marlin
Black marlin
Blue marlin
Billfish (other)
Billfilsh (unidentified)
Sailfish
Sharks/Rays
White shark
Basking shark
Megamouth shark
Giant manta ray
Marine Mammals
Bottlenose dolphin
Risso's dolphin
Common dolphin (long-beaked and short-beaked)
Northern right whale dolphin
Pacific white-sided dolphin
Fin whale
Humpback whale
Gray whale
Short-finned pilot whale
Minke whale
Sperm whale
Sea Turtles
Leatherback turtle
Loggerhead turtle
Olive ridley turtle
Green turtle

Green = to be considered for addition (not on original list; appeared in FEIS datasets)

Sharks/Rays
Blue shark
Shortfin mako
Pelagic stingray
Common thresher shark
Oceanic whitetip
Silky shark
Marine Mammals
Striped dolphin
California sea lion
Northern elephant seal
Guadalupe fur seal
Unidentified seal
Mesoplodont Beaked Whale
False killer whale
Sea Birds
Black-footed albatross
Laysan albatross
Unidentified shearwater

Combined List after Applying Simple Criteria

1) Species that did not appear in any “longline-type” dataset in the FEIS - ***removed***
2) Species in a vulnerable species group (sharks/rays) that were “commonly caught” in any dataset in the FEIS - ***added***
3) Protected species (ESA, MSA, MMPA, or MBTA) with at least one interaction in any dataset in the FEIS - ***added***

*This analysis excluded the DGN fishery and the extended link deep-set buoy gear datasets in the FEIS.

Finfish
Striped marlin
Black marlin
Blue marlin
Billfilsh (other and unidentified)
Sailfish
Sharks/Rays
Blue shark
Shortfin mako
Pelagic stingray
Scalloped hammerhead
Oceanic whitetip
Silky shark
Marine Mammals
Bottlenose dolphin
Risso’s dolphin
Common dolphin (long-beaked and short-beaked)
Striped dolphin
California sea lion
Northern elephant seal
Guadalupe fur seal
Unidentified seal
Mesoplodont Beaked Whale
False killer whale
Sea Turtles
Leatherback turtle
Loggerhead turtle
Olive ridley turtle
Green turtle
Sea Birds
Black-footed albatross
Laysan albatross
Unidentified shearwater

Summary of Requests for the Council

1. FIW work plan: Consider and provide guidance on the status of the work plan and future FIW workload as necessary.
2. EFP guidance: Provide input on the proposed ways to provide support and guidance to EFP applicants, including through the development of materials and resources.
3. EFP performance goal/metrics/benchmarks:
    a. Review and provide feedback on a proposed overall EFP performance goal;
    b. Review the FIW's preliminary preferred options for economic and bycatch metrics and benchmarks for evaluating EFP performance and provide any feedback;
    c. Review the two options currently under consideration by the FIW for determining a prioritized list of bycatch species needed to calculate species-level benchmarks and provide guidance.

Questions?

