

HIGHLY MIGRATORY SPECIES ADVISORY SUBPANEL REPORT ON HMS ROADMAP: EXEMPTED FISHING PERMITS GOALS AND METRICS

The Highly Migratory Species Advisory Subpanel (HMSAS) had a long discussion about the progress the Fisheries Innovation Workgroup (FIW) has made on the metrics and benchmarks related to economic viability and bycatch. In general, the HMSAS supports the work of the FIW, including considering benchmarks and metrics that are simple, understandable, and realistic from a timeframe standpoint. Given that, the HMSAS does offer the following advice to the Pacific Fishery Management Council (Council).

We believe the FIW should consider adding gross profits as an economic viability performance metric. Oftentimes fishing operations pay their crew based on gross profits. The costs of the trip (fuel, bait, groceries, and ice) are deducted from gross revenues to arrive at the funds from which crew is paid, then an agreed upon formula will split those funds between the boat, captain, and crew shares. Some members thought we should also include the payments to the crew in the analysis, while others said crew pay is different from boat to boat and would not be meaningful. All agreed we should document the number of crew and days at sea as those can be compared amongst the different fisheries. This could generate an economic metric per day that could be compared to other fishery benchmarks.

The HMSAS recommends the FIW consider excluding purse seine and the albacore surface fishery from the ex-vessel revenue performance metric. The operational aspects and markets for those fisheries are sufficiently different that they will not be an appropriate data source.

The HMSAS has concerns about the ex-vessel price per pound performance metric. Particularly, the likelihood that price per pound for low-volume fisheries could bias that performance metric. Inclusion of the qualitative performance metric will add necessary context.

The HMSAS also discussed metrics for bycatch and has concerns about how the discard rate will be calculated and how it will be utilized. We acknowledge bycatch will happen despite the best efforts of the fleet. As exempted fishing permits (EFPs) are fished there will be opportunities for innovation and problem-solving skills of fishermen to find better ways to reduce bycatch while harvesting enough marketable fish to be successful.

The HMSAS seeks further clarity from the FIW on the following:

- If discards of live animals will be included in the discard rate, which species will be considered and will post-release mortality be incorporated (if available) or estimated (if not available).
- The HMSAS recommends the FIW add a qualitative element to describe discard rates to provide context where appropriate. This could be incorporated into the annual EFP reports.

- The HMSAS believes the Council and the public would benefit from calculating discard rates for all species encountered as well as discard rates for protected species and other species that may have a perceived higher “public value”. The FIW should consider and recommend different options/considerations.

In general, the HMSAS continues to note that fishermen need flexibility in prosecuting their EFPs. We heard from fishery participants that night fishing for Pacific Bluefin tuna (PBF) has failed for deep-set buoy gear (DSBG) fishermen. The 90-meter limitation as incorporated into the DSBG fishery has, for the most part, excluded commercial fishermen from harvesting PBF that are typically found at 25 to 50 meters during the night. The 90-meter limitation was included to reduce bycatch; but has resulted in night fishing DSBG being not economically viable. Meanwhile, jig fishing for PBF at night has been a success story for the southern California recreational fishery.

The HMSAS is fortunate to have fishermen with a range of experience and meeting in person allowed this important discussion.

PFMC
11/16/25