

GROUND FISH ADVISORY SUBPANEL REPORT ON ALLOCATION REVIEW
PROCEDURES - PRELIMINARY

Dr. Jim Seger briefed the Groundfish Advisory Subpanel (GAP) on the background and rationale for this agenda item. The GAP offers the following comments and recommendations.

As an overarching matter, the GAP wishes to highlight that allocation, and in particular reallocation, is a serious matter that should not be taken lightly. It is often divisive, creates winners and losers, and can upset established conditions that extend from the dock to end markets. Generally speaking, the GAP supports the established groundfish allocations and believes that the Council already addresses reallocation effectively. Moreover, the current allocations generally provide important stability to fishery sectors.

Furthermore, of the potential review triggers identified, the GAP has grave concerns about the “indicator based” approach. In the GAP’s view, a formulaic review imposed when certain conditions are met (or not met) will be incredibly challenging to craft in a smart, effective way that does not lead to unintended consequences. Fisheries are often in flux responding to environmental, market, and other factors. Given that, we believe a formulaic approach would likely either trigger frequent reviews wasting Council resources, or potentially not trigger a review when needed. The GAP believes the periodic review is the most appropriate tool for most species, and notes that in the Council framework a review arising from public input is always a possibility. As a final overarching matter, the GAP believes that any public request for allocation review occur through the normal Council process including review by the appropriate advisory panels.

The GAP also offers the following specific recommended changes to Table 1 from Agenda Item D.4, Attachment 4:

Sablefish North of 36° N latitude (Trawl/Fixed Gear and Limited Entry/Open Access)

The review trigger is currently listed as public interest review. The GAP believes it should instead be a periodic review. This change recognizes that there was a review in 2017 and there is an upcoming review in 2022.

List species for all allocations (e.g. Limited Entry/Open Access Allocations for Groundfish Species Not Listed Above)

There are a number of allocations in the table that do not list specific species. To eliminate potential confusion, the GAP recommends listing out the species included in every listed allocation.

Bycatch allowances/set-asides/ITS species should not be included as allocations in need of review in the table

The last two rows in the groundfish portion of the table are not true allocations and should not be included in this table.