

OCTOBER 2018 SaMTAAC PRINCIPLES AND CAB PURPOSE AND NEED STATEMENT

Principles

At its October 2018 meeting, the SaMTAAC reviewed the principles that were originally developed by the Community Advisory Board (CAB) along with the SaMTAAC discussion of principles and related objectives from its June 2018 meeting (SaMTAAC Agenda Item D, Attachment 1, October 2018, attached here as an appendix). On the basis of that review, the committee adopted the following principles.

- A. We want to ensure there is trawl affordable access to sablefish.
- B. We believe that unlimited catch of sablefish through gear switching is not desirable.
- C. We want to consider impacts on existing operations/investments.
- D. We want to maintain the gear switching option for trawl operations.
- E. We will consider industry and community impacts and ensure long-term stability
- F. We will consider the effect on the value of trawl permits.
- G. We want to increase the net economic value of the trawl individual fishing quota fishery.

The recommended alternatives that the committee moves forward are expected to support the principles adopted; and the principles, along with Amendment 20 (trawl catch share program) goals and objectives, will contribute to an objective evaluation of those alternatives in the next step of the process. Different alternatives may meet and address the principles to differing degrees. The principles are also expected to provide a tool for communicating to stakeholders the committee's intent with respect to the alternatives it develops.

Purpose and Need

In November 2017, the sablefish issues being addressed by the SaMTAAC were part of the trawl catch share review follow-on action package. At that time, the CAB Report to the Council stated the following.

Based on its understanding of the fishery and biology of the stock, the CAB reached a consensus recommendation on the following purpose and need statement:

Proposed Purpose and Need: Action is needed to allow the shorebased trawl sector to reduce costs and more fully harvest its allocation to the benefit of industry (harvesters and processors), communities, and consumers. Currently, the trawl southern sablefish allocation is going largely unharvested while the northern sablefish allocation is nearly fully harvested. At the same time, the analysis shows that the amount of sablefish quota pounds (QP) available in the north is one of the factors limiting the harvest of multispecies complexes of which sablefish is a part. There is not a biogeographic break in the sablefish stock structure that requires a management boundary at 36° N. latitude. The trawl sablefish in the south is being harvested primarily by vessels using fixed gear (vessels gear switching) that travel

down from the north. The purpose of this action would be to create a coastwide sablefish allocation for the trawl sector and/or limit gear switching.

There are participants on the CAB that question whether gear switching is the cause of the lack of availability of sablefish to the trawl fishery in the north.

However, because the Council decided to split these issues off into an independent process it did not consider whether to adopt the purpose and need statement recommended by the CAB.

WHERE DO WE WANT TO GO?

This document first provides a summary of previous Council discussion and Amendment 20/FMP goals and objectives then summarizes SaMTAAC discussion on this topic from the June meeting.

Summary of Council Discussion on Sablefish Area Management and Gear Switching from March 2018 – Bullet Points

Principles (from CAB)

- A. We want to get more sablefish to the trawl fleet.
- B. We believe that unlimited catch of sablefish through gear switching is not desirable.
- C. We want to consider existing operations/investments.

Council Discussion

1. overall goals of resource access and utilization
2. trawl gear is the only gear that can viably harvest some groundfish species
3. trawl rationalization was intended to improve the trawl fishery
4. evaluate allocation attainment problems and how solutions address
5. take a long-term view e.g., even if gear switching is not an immediate problem, is a limit needed to prevent future problems?

6. importance of sablefish to the overall economics of a trawl trip
7. the buyers have an interest in trawl trips;
8. the importance of trawl deliveries to maintaining markets;
9. conservation impacts;
10. potential fleet conflicts from geographic redistribution; and
11. implementation costs and challenges of potential solutions.

Groundfish FMP

Management Goals

Goal 1 - Conservation. Prevent overfishing and rebuild overfished stocks by managing for appropriate harvest levels and prevent, to the extent practicable, any net loss of the habitat of living marine resources.

Goal 2 - Economics. Maximize the value of the groundfish resource as a whole.

Goal 3 - Utilization. Within the constraints of overfished species rebuilding requirements, achieve the maximum biological yield of the overall groundfish fishery, promote year-round availability of quality seafood to the consumer, and promote recreational fishing opportunities.

Amendment 20

Goal

Create and implement a capacity rationalization plan that increases net economic benefits, creates individual economic stability, provides for full utilization of the trawl sector allocation, considers environmental impacts, and achieves individual accountability of catch and bycatch

Objectives

The above goal is supported by the following objectives:

1. Provide a mechanism for total catch accounting.
2. Provide for a viable, profitable, and efficient groundfish fishery.
3. Promote practices that reduce bycatch and discard mortality and minimize ecological impacts.
4. Increase operational flexibility.
5. Minimize adverse effects from an IFQ program on fishing communities and other fisheries to the extent practical.
6. Promote measurable economic and employment benefits through the seafood catching, processing, distribution elements, and support sectors of the industry.
7. Provide quality product for the consumer.
8. Increase safety in the fishery.ⁱ

SaMTAAC Discussion

Other possible principles/criteria/objectives suggested by individuals during SaMTAAC discussion

- a. Maximum benefit for trawl sector (similar to 3 in Council discussion summary)
- b. Gear switching is an important part of the program for trawl vessels
- c. Recognize existing investment in gear switching (people who have made investment should not lose that investment) (similar to C in CAB principles)
- d. Prevent new entry into gear switching (similar to 5 in Council discussion summary)
- e. Prevent excessive gear switching in the future
- f. One area or region should not be disadvantaged relative to others
- g. Consider needs of quota funds to be able to lease out quota
- h. Solutions should be measured—proportional to the degree/scope of the program.

ⁱ Amendment 20 also included what were termed “Constraints and Guiding Principles:”

The [Amendment 20] goals and objectives should be achieved while the following occurs:

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1. Take into account the biological structure of the stocks including, but not limited to, populations and genetics.
 2. Take into account the need to ensure that the total OYs and allowable biological catch (ABC) are not exceeded.
 3. Minimize negative impacts resulting from localized concentrations of fishing effort.
 4. Account for total groundfish mortality.
 5. Avoid provisions where the primary intent is a change in marketing power balance between harvesting and processing sectors.
 6. Avoid excessive quota concentration.
 7. Provide efficient and effective monitoring and enforcement.
 8. Design a responsive mechanism for program review, evaluation, and modification.
 9. Take into account the management and administrative costs of implementing and oversee the IFQ or co-op program and complementary catch monitoring programs, as well as the limited state and Federal resources available.