

PACIFIC COAST FISHERIES DATA COMMITTEE REPORT ON TRACKING LANDINGS  
OF SABLEFISH NORTH OF 36° N. LATITUDE

*Background*

The Groundfish Management Team (GMT) identified issues with tracking landings of sablefish north of 36° N. latitude against the daily trip limit (DTL) fishery and the primary tiers within the Pacific Fisheries Information Network (PacFIN). These issues were raised at the March<sup>1</sup> and June<sup>2</sup> Council meetings and the Council requested that the Pacific Coast Fisheries Data Committee (hereinafter Data Committee) explore potential solutions. In summary, PacFIN tracks fixed gear sablefish landings inseason, and apportions catch to the tier fishery or the DTL fishery, and supplies those data estimates to the GMT to model accurate trip limits for the DTL fishery necessary to attain the allocation. Although the GMT does not monitor the tier fishery inseason, there may be interest from the Northwest Region (NWR) as well as state and federal enforcement to ensure tiers are not exceeded. Generally, GMT attention to the tier fishery has been minimal since management concerns have not been identified (i.e., the total tier allocation has not been exceeded). However, since the tier fishery allocation is approximately five times as large as the DTL harvest guideline, error in the estimated apportionment between the two of them within PacFIN, has large proportional implications to model predictions of attainment of the DTL harvest guideline, and for resultant inseason management measures.

The Data Committee met November 29-30 in Portland, Oregon and identified the following options for resolving this issue:

1) **Increase Compliance with Existing State Regulations:** State laws currently require permits be assigned to fish tickets. There are no federal regulations requiring permit numbers on fish tickets, yet the pre-ambule to the proposed and final rule that implemented the sablefish permit stacking program in 2005-2006 requested state compliance (see 70FR59296 and 71FR10614). In the event multiple permits are assigned to one vessel and landing (as in the case of fishing multiple tiers on one vessel), separate fish tickets are completed and each ticket identifies the permit to which the catch is attributed. Data from PacFIN indicates that none of the fish tickets in Oregon have permit numbers (Table 1). In Washington between 58 and 67 percent of fish tickets contain permit numbers. The amount of sablefish landed on fish tickets in Washington without permits is less than 20 percent of the total weight landed in Washington annually (Table

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<sup>1</sup> See Agenda Item H4b, Supplemental GMT Report, starting on page 4 at [http://www.pcouncil.org/wp-content/uploads/H4b\\_SUP\\_GMT\\_RPT1\\_MAR2011BB.pdf](http://www.pcouncil.org/wp-content/uploads/H4b_SUP_GMT_RPT1_MAR2011BB.pdf)

<sup>2</sup> See Agenda Item E.5.b, Supplemental GMT Report, starting on page 15 [http://www.pcouncil.org/wp-content/uploads/E5b\\_SUP\\_GMT\\_JUN2011BB.pdf](http://www.pcouncil.org/wp-content/uploads/E5b_SUP_GMT_JUN2011BB.pdf)

2). **The Data Committee identified increasing compliance with existing regulations as one solution for tracking primary vs. DTL landings.** This solution appears to satisfy the desires of the GMT, NWFSC, NWR, and enforcement.

Oregon noted they do not upload the permit number to PacFIN, even though the numbers sometimes are reported on the paper fish tickets, due to liability issues. The states are unable to access NWR permit data through their data systems so any verification of permit is done by accessing a list on the NWR website. This list provides a current snap shot of which vessels have what permits and the tier limits of each. The states use this information to try and manually link landings to permits, however the fisher can transfer these permits inseason creating problems with identifying what vessel is associated with the permit. Also, dealers provide permit numbers on tickets but do not always change permit numbers when a tier is filled. Throughout the season the same number is submitted to the state. The state requests verification from either the fisher or the dealer or both on what permit should be associated with the landing but does not always get a response so this makes it difficult at the state level to assign a permit to a landing without the fishers consent, since it eventually leads to the assignment of catch history against a permit.

In California, groundfish permit numbers are sometimes listed on the fish ticket by the dealer. Permits are not edited by the state, however, CDFG staff plan to add a groundfish permit table to edit permits on tickets, sometime later this year. Presently, every semi-monthly PacFIN ticket update from the CDFG PacFIN coordinator uses data from the PacFIN permit tables and an algorithm to edit the CDFG ticket permit or assign a permit to limited entry tickets without permits. Therefore, 100 percent of the fish tickets in PacFIN have a permit number (Table 1).

Placing the permit numbers on all of the sablefish landings would allow primary landings to be accounted directly to tier permits, throughout the season, and alleviate the need to use an estimation procedure through the extra layer of vessel-day, which adds error to the estimates of primary and DTL landings within the PacFIN database (compared with direct accounting).

Option 1 would eliminate the need for using a proxy of landings distribution among permits when stacked on a vessel, and should enable accurate tracking of the landings against the permit when transferred.

Tracking landings directly to each individual permit number recorded on the fish ticket would remove the estimation error currently inherent in calculating the split between sablefish primary and DTL, and produce the most accurate estimates of DTL landings for trip limit management.

Table 1. Count of non-trawl fish tickets with sablefish landings that include permit numbers by year and state.

State	Year	Count of Tickets with Permits	Total Count of Tickets	% With Permit Number
Washington	2010	207	358	58%
	2011	194	288	67%
Oregon	2010	0	894	0%
	2011	0	722	0%
California a/	2010	745	745	100%
	2011	639	639	100%

a/ North of 36° only

Table 2. Count of non-trawl fish tickets with sablefish landings without permit numbers by year and state. Landings, in metric tons, are also provided.

State	Year	Count of Tickets Without Permits	Landings (mt) on Tickets Without Permits	Total Landings (mt)	% by Weight of Tickets Without Permits
Washington	2010	151	90	547	17%
	2011	94	44	327	14%
Oregon	2010	894	860	860	100%
	2011	722	753	753	100%
California a/	2010	0	0	506	0%
	2011	0	0	434	0%

a/ North of 36° only

2) **Track Primary Season Poundage for the Tiered Permits.** Another approach discussed by the data committee was the possibility of determining whether landing was part of the tier or DTL fishery based on whether the tier permit had caught all of its available quota (taking into account whether the tier fisheries open and whether or not more than a threshold amount is left on the permit). The primary concern with this approach was the possibility that permits would be transferred midseason. Tracking under such circumstances might present an obstacle particularly when the permits are stacked and there may be some uncertainty as to the permits against which particular landings were made. In regard to addressing this concern, there is a requirement that the poundage already caught when such transfers occur be reported to the limited entry office, however at present this information is not transmitted to the PacFIN system. At the time the data committee discussed this issue information was not available on the frequency of occurrence of midseason transfers and associated burden with providing that data to the PacFIN program. Since that time information on midseason permit transfers has been

provided by the Limited Entry Permit Office and is presented in Table 3. The number of midseason permit transfers per year has run between 2 and 18, escalating to 18 in 2011. The increase in transfers in 2011 might be associated with the new IFQ program for the trawl fishery, in which exterior vessels which acquire trawl permits are allowed to participate. For 2007 through 2009 and in 2011, half or fewer of the transfers involve permits on which some landings had occurred prior to the transfer. Each year there are a few missing landing reports for midseason permit transfers, up to four in 2010 and in 2011. Because several of the transfers for which landing reports were missing involve the same vessels (i.e. involve stacked permits) the maximum number of vessels involved was only two.

This approach is similar to the current process that keeps track of primary catch on a permit-day basis, and after catch on a permit reaches the tier limit (or when less than a threshold amount is left on the permit) the catch is considered DTL. When stacked permits exist for a landing the catch is apportioned to the stacked permits, and when permits are transferred PacFIN incorporates those data through the NWR permit database. The only difference between this option and the status quo methodology is the suggestion to use the "poundage already caught when such transfers occur", which may be difficult to incorporate because it involves trying to combine actual data ("poundage already caught") with estimated data (catch apportioned due to stacked permits).

Table 3. Number of midseason transfers of fixed gear sablefish tiered permits and whether permits were used prior to transfer (zero pounds or more than zero pounds at time of transfer).

	2007	2008	2009	2010	2011
Total Permit Transfers	9	2	6	13	18
Zero Pounds at Time of Transfer	5	2	3	4	11
Possibly More Than Zero at Time of Transfer <sup>a/</sup>	4	2	3	9	7
Poundage Report Missing for Permit Transfer	2	1	1	4	4
Vessels With Missing Poundage Reports <sup>b/</sup>	1	1	1	2	2

a/ Reported pounds and those for which a pound report was missing.

b/ Vessels with missing poundage reports are fewer than number of missing poundage reports because multiple permits were transferred between the same two vessels.

**3) Add a fish ticket field which would indicate whether landing is DTL or tier.** The Data Committee recognized that the heart of the problem lies with identifying DTL landings for accurate trip limit modeling. Therefore, another solution would be a fish ticket field to identify DTL or tier landings. The Committee noted it is difficult to modify state fish tickets and the associated state databases; therefore, this solution may not be the most expedient. In the event electronic fish ticket reporting expands from the IFQ fisheries into other sectors, these data would be easily accommodated.

The Committee notes that this additional field would satisfy GMT inseason tracking of the DTL fishery, but would not resolve NWR, NWFSC, or enforcement desires for tracking tiers against

permits. That is, if the permit numbers are not recorded, it is still difficult to track tiers with permits. If this solution was implemented, it should require that fishers check one of two boxes (“tier” versus “DTL”), to eliminate the possibility of errors by omission.

**4) Restrict Transfer of Permits.** The Data Committee briefly explored regulatory solutions to this issue. One potential solution would be to restrict the transfer of limited entry permits once tier fishing has occurred on a given permit. The Committee believes this is likely an undesirable approach, since it would greatly limit flexibility and efficiency for limited entry tier fishermen. Including this option would likely highlight the importance of the issue to fishers, and reduce the probability of the issue being ignored. This solution would resolve tracking concerns for all parties.