

GROUND FISH MANAGEMENT TEAM REPORT ON IMPLEMENTATION FOR
AMENDMENT 20 (TRAWL RATIONALIZATION) AND AMENDMENT 21 (INTERSECTOR
ALLOCATION) AS WELL AS SCOPING OF PRIORITIZED TRAILING AMENDMENTS

The Groundfish Management Team (GMT) discussed the calendar for trailing actions on the trawl catch shares (Agenda Item H.5.a, Attachment 4, November 2010), and has the following comments and considerations.

The GMT recommends finalizing any decisions regarding Amendment 21 supercedence of Amendment 6 prior to the biennial specifications and management measures (SPEX) process, beginning in November 2011. If this is delayed such that it overlaps the SPEX process it would cause considerable confusion. There was similar confusion this year from having the Amendment 23 process overlaid on the SPEX.

Likewise, the GMT recommends the Council consider moving Topic 3 (QS/QP Control Rule Safe Harbor (CFAs, Risk Pools, & Financing) to a higher priority so that the topic may be addressed as soon as possible. The GMT notes that formation of risk pools that are not constrained by control limits may reduce the likelihood of exceeding the allocation or annual catch limit (ACL) of overfished species. Hence, removing control limits from risk pools allow the catch share program to be conducted more efficiently and with less chance of needing additional management measures. Furthermore, when the Council addresses this trailing amendment, the GMT suggests that Risk Pools might be considered separately from community fishing associations (CFAs), because the two initiatives could be allowed for different purposes (i.e. a CFA could be formed for purposes of community stability independent of the need for a risk pool). It may be simpler to consider the issues surrounding risk pools separately from the considerations associated with formation of CFAs rather than in combination.

We would also like to remind the Council as they develop the prioritized list of trailing actions that there is the potential need to respond to emergent issues in the first few years of the trawl rationalization program. For example the total mortality of longnose skates was exceeded the OY in 2009 and it is unclear if additional measure will be required under the individual quota (IQ) program to prevent this happening again. Similarly, if there is difficulty in implementing tools (as discussed above) to prevent exceeding the allocation or ACL of overfished species the Council may need to develop trailing amendments to address the issue.

GMT Recommendations:

- 1. Finalize Amendment 21 supercedence of Amendment 6 prior to the biennial specifications and management measures (SPEX) process beginning in November 2011.**
- 2. Prioritize Topic 3 (QS/QP Control Rule Safe Harbor (CFAs, Risk Pools, & Financing) to a higher priority so that the topic may be addressed as early as possible.**
- 3. Consider the need to develop trailing amendments in the early years of the program in addition to those already identified.**