
C1 BSAI PACIFIC COD POT CP LLP LICENSES

SAM CUNNINGHAM, FEBRUARY 2021



OVERVIEW

- Purpose, alternatives, and outcomes
- 2021 update
- LLP license use
- Community affiliations
- Impacts
- Management & Monitoring



PURPOSE & NEED

Amendment 85 to the Groundfish FMP for the BSAI assigned a portion of the Bering Sea/Aleutian Islands Pacific cod TAC to the pot CP sector with the primary goals of aligning Pacific cod allocations with actual dependency and use and providing stability to all sectors. Major changes have occurred since the implementation of Amendment 85, which has resulted in less stability for the dependent vessels on which the Amendment 85 allocation was based:

- 1. Low crab and Pacific cod TACs and consolidation within the crab and hook-and-line CP fisheries has provided increased flexibility for pot CPs;*
- 2. The TAC for Pacific cod in the BSAI has decreased over the last several years; and*
- 3. The availability of rollovers to the pot CP sector has declined.*

The Council is considering action to eliminate latent capacity in the fishery in order to increase stability for cod dependent pot CPs, to maintain consistently low rates of halibut and crab bycatch, and to ensure that condensed fishing seasons do not result in safety-at-sea concerns.

- Economic and operational stability *relative to No Action*
- Does not create additional harvest opportunity
- Other benefits may be contingent on voluntary actions by participants



ALTERNATIVES

Alternative 1: No action

Alternative 2: Remove the Bering Sea and Aleutian Islands Pacific cod pot gear CP endorsements from LLP licenses unless the vessel(s) named on the LLP license at the time of landing is/are cumulatively credited with a minimum of 1,000 metric tons of retained commercial Pacific cod caught while operating as a CP with pot gear in the BSAI based on the following threshold criteria:

- Option 1: 2005 – 2019
- Option 2: 2012 – 2019

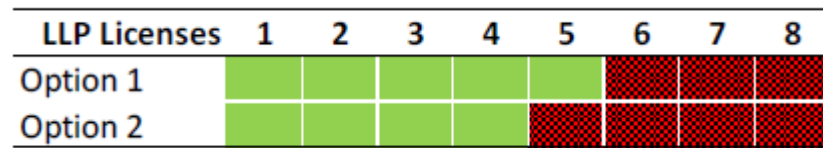


Figure ES-1, p.7

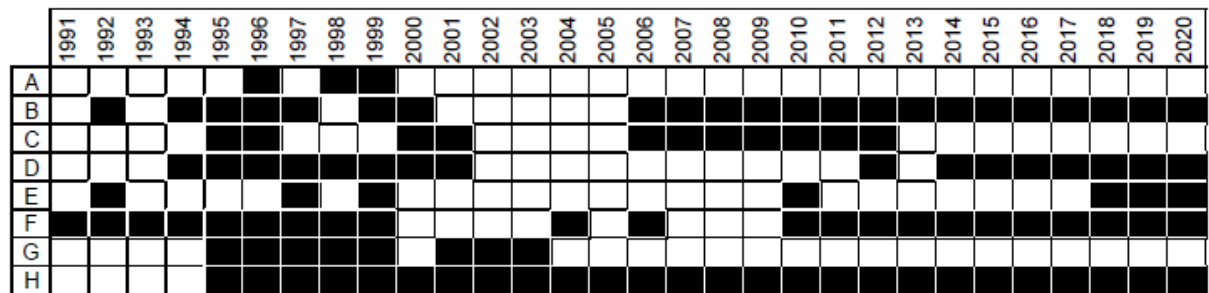


Figure 3-5, p.37



2021 “A SEASON”

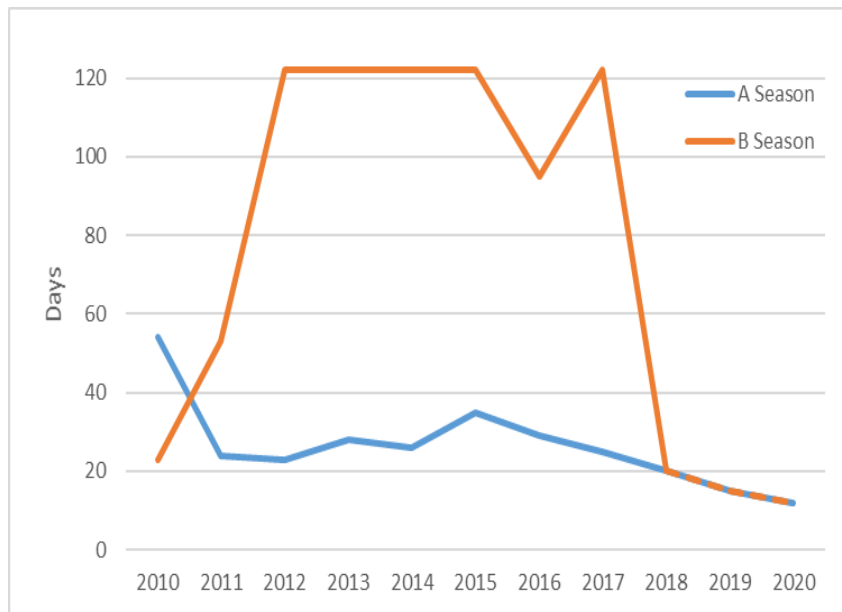


Figure 3-2, p.32

- Closed Jan. 16 ([bulletin](#))
- 3 vessels
- 795 of 850 mt harvested (94%)
- Low catch rates at the opening
- Fishing time lost due to:
 - Weather
 - Moving gear for sea ice
 - Crew injury
 - Catch reporting software malfunction



CP LICENSE USE OPTIONS

- **Fish as a CP**
 - Alt. 2 would not affect licenses' endorsements for GOA_Pot_CP
- **Fish as a CV**
 - Requires *both* CP and CV endorsements on the FFP
 - Can be done on a temporary basis
 - Catch accrues to CV TAC
 - Does not remove vessel from CP observer coverage requirements
- **Have LLP license reissued as CV license**
 - A one-time, permanent change
 - “Integrated License”
 - Affects all groundfish activity
 - Endorsements are not severable
 - Does not affect crab permitting



COMMUNITY AFFILIATIONS

- Vessel-ownership and operational geography information: Unchanged
 - Small percentage of high-volume locales
- License ownership
 - Company/corporate ownership
 - Unequal reportable information
 - Identification of CDQ (2) and Alaska Native Corporation (1) interests
 - Cannot specify license status under Alternative 2



IMPACTS: ALTERNATIVE 1

- “No Action” is not necessarily the same as “Status Quo”
- Policy choice: Future opportunity vs. “stability”
- Maintains transfer value of all Pot CP endorsed LLP licenses
- Inducement of additional vessels is less linked to TAC than to what is happening in other fisheries
- Operational inefficiencies: travel cost, labor productivity, crew retention, safe operation, flexibility to respond to bycatch or cod quality
- ABC/TAC is very unlikely to reach a level that returns Pot CP apportionment to the catch levels witnessed ~2012-2016
- The sector is likely to remain in a state of overcapacity (under either alternative)



IMPACTS: ALTERNATIVE 2

- What is the right size for the sector? Is it different now than it was when Am 67 was passed?
- Benefits to qualifying license-holders are largely operational and on the margin. Does this outweigh the lost “option value” for non-qualifiers?
- Do not predict spillover of fishing effort into other fisheries/sectors as a direct effect of this action (including GHL)
- Potential for this action to signal license holders in *other* fisheries/sectors to utilize all their endorsements



Requirement	Cost	Benefit
Level 2 Observers	Reduces observer deployment flexibility; smaller pool of qualified observers, however, large portion of observers are Level 2 qualified (Table 3-17)	Reduces likelihood of data deletion
Pre-cruise meetings	Time to notify NMFS and participate in meeting if required (30 min up to 2 hours)	Improves communication between observer and crew and reduces likelihood of data deletion
Observer Sampling Station and motion-compensated platform (MCP) scale	Cost of new equipment installation (\$20k to \$100k) and annual NMFS inspection (for vessels already equipped add'l cost = \$0)	Provides observer workspace and improves precision of estimates by the use of MCP scale

MANAGEMENT & MONITORING



QUESTIONS?

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