



D8 Sablefish Discarding

April 2019 Council Meeting

Action Memo

Staff: Jim Armstrong
Other Presenters: Joe Krieger NMFS (AKRO)
Action Required: Review discussion paper

BACKGROUND

Since April 2018, a regulatory change that would allow discarding of small sablefish in the Individual Fishing Quota (IFQ) sablefish fishery has been discussed as a potential tool to mitigate fishery and population impacts of very large sablefish year classes. This change was first suggested by IFQ stakeholders following enormous increases in survey catches of small sablefish from the 2014 year class, the largest on record. In October 2018, the Council has reviewed an [Initial discussion paper](#) that evaluated a range of biological, economic, and management considerations related to a discarding allowance, and which pointed out that growth of fish from the 2014 year class into typical market categories would outpace the timing of the proposed management change.

After review of the October 2018 discussion paper, the Council passed [a motion](#) instructing staff to gather more information on the possible implications of permitting sablefish discarding, identifying in the motion nine areas of concern for staff to focus on.

The [discussion paper](#) attached under this agenda item identifies for the Council a range of decision points that would likely require development through a future analysis if the Council chooses to move forward with action on this issue. The nine areas of concern identified by the Council in October 2018 are addressed directly in the paper with particular emphasis on options for estimating and accounting for discard mortalities in the IFQ sablefish fishery and the resource investments associated with those options. Select conclusions associated with Council's itemized concerns are provided here:

1. Observer-based monitoring of discards, in-season application of discard mortality rates (DMRs), ongoing observer-based assessments of mortality factors, and annual specification of DMRs all contribute to managing halibut discarding by non-target groundfish fisheries, and this likely represents the most resource intensive option for the sablefish IFQ fishery, requiring extensive vessel-level monitoring of sablefish discards and mortalities.
2. An analysis of fixed or proxy DMRs, or an approach similar to that used in the IFQ halibut fishery, would likely reduce the need for extensive vessel-level monitoring, but also require assumptions about how accurate are the DMRs or how consistent are of sablefish survey catches with those in the directed fishery.
3. Episodic allowances of discarding in response to occurrences of large year classes would likely be shown in a future analysis to be generally unadvisable, as this approach appears to make unrealistic assumptions about the accuracy of initial year-class strength estimates from the survey, which would serve as the triggers for initiating or terminating the discard allowance in a given year.

4. The range of effects IFQ sablefish discarding may have on whale depredation would have to be further explored, as they are not currently well understood, however, it is not likely that discarding small sablefish would result in a decrease in whale depredation.
5. A range of gear modifications and operational choices are available and in use by industry to avoid small sablefish, and current regulations do not appear to constrain the use of these techniques as a response to future year class anomalies.
6. Allowing for discards of small sablefish could add to the potential of exceeding the overall ABC/TAC, but the chances of overages the TAC would be highly contingent on the chosen DMR. An allowance for IFQ discarding may generate a significant fishery response which would require discard accounting, possibly including allocation within the sablefish TAC for directed fishery discard mortality.
7. Preferential selection of large sized sablefish, as a result of small sablefish discarding, could result in negative consequences for the spawning stock, which has been in decline over the last decade. Allowing immature individuals from a major year class the chance to reproduce even once could have a dramatic positive impact on spawning stock biomass. A critical determination that the Council would need to consider is the longevity in which to allow small sablefish discarding to occur.
8. A discarding allowance sets the stage for discarding fish above the intended threshold size if a range of conditions are perceived to support that. This issues is also an enforcement concern and consistent with general concerns about effort on the limited biomass of larger, older fish.
9. Enforcement concerns can be broken down into vessel-level operations and the effects of the regulations and other management structures on the fishery as a whole. Generally, as the regulatory changes get more complex, they involve more enforcement demands. The fundamental enforcement concern on the fishery as a whole is how discards impinge on IFQ accounting and the degree that this affects accuracy in discard reporting.