GOA Tendering Report¹ February 2016

Introduction

In April 2013, the Council tasked staff to prepare a brief report on GOA tendering activity in the pollock and Pacific cod fisheries. This action was initiated due to the reported increase in tendering activity in the GOA pollock and Pacific cod fisheries and a shift in delivery patterns of GOA pollock and Pacific cod to shoreside processors. The Council first reviewed the tendering activity report at the June 2013 meeting, which provided an overview of the legal framework associated with tendering in the GOA groundfish fisheries, a description of tendering activity in the GOA pollock and Pacific cod fisheries from 2010 through April 2013, and a description of the management and observer implications of tendering activity in the GOA pollock and Pacific cod fisheries. Since the presentation of the updated GOA tendering activity at the February 2014 meeting, the Council has asked for regular updates on GOA tendering activity noting that changes in the GOA pollock and Pacific cod fisheries could potentially result in the development of a GOA trawl bycatch management action.

Legal Framework for GOA Tendering Activity

The term "tendering" refers to the fishing practice where one vessel (the tender) takes the unprocessed catch from a second fishing vessel and transports the catch to port. This practice allows the fishing vessel to resume fishing without the delay associated with traveling to port and returning to the fishing area. One tendering vessel can service multiple fishing vessels, depending on its capacity and the regulations that limit tendering activity.

A tender vessel is defined in regulations as a vessel that is used to transport unprocessed fish or shellfish received from another vessel to an associated processors (50 CFR §679.2). A tender, like a land-based entity, can also be defined as a buying station, which receives unprocessed groundfish from a vessel for delivery to a shoreside processor, stationary floating processor, or mothership. A tender vessel does not process fish (50 CFR §679.2). A tender can be a support vessel. A support vessel is used in support of other vessels that include but not limited to, supplying a fishing vessel with water, fuel, provisions, fishing equipment, fish processing equipment or other supplies, or transporting processed fish (50 CFR §679.2).

The authority to regulate tenders is provided through the definition of fishing under the Magnuson-Stevens Fishery Conservation and Management Act (MSA). The MSA defines fishing to include at-sea vessels that assist in catching, taking, or harvesting fish. Authority to regulate tenders is also reflected in the requirement for vessels to be issued a Federal fisheries permit (FFP) before being deployed to conduct operations as a tender vessel in Federal waters of the GOA or BSAI (50 CFR §679.4(b)).

The Council recommended and NMFS implemented Steller sea lion management measures for the BSAI and GOA in 2001. That action implemented a variety of measures to slow the pace of the pollock fishery. One measure prohibits catcher vessels from fishing in both the GOA and BS during the same fishing season (50 CFR §679.23(i)). Another measure restricts tendering activities in the GOA. Specifically, tender vessels cannot operate east of 157°00' W longitude for pollock in the GOA (50 CFR

¹ This report was prepared by Matt Robinson (NPFMC) with input from Diana Evans and Jon McCracken (NPFMC), Mike Fey (AKFIN), Darrell Brannan, Mary Furuness (NMFS Alaska Region), Jennifer Mondragon (NMFS Alaska Region), Josh Keaton (NMFS Alaska Region), Krista Miliani (NMFS Alaska Region), Tom Meyer (NOAA General Counsel), Julie Bonney (Alaska Groundfish Databank), and Joe Plesha (Trident).

§679.7(b)(3))² (see Figure 1). The Council recommended retaining the ability to tender west of 157°00' W longitude, under Steller sea lion regulations, because smaller vessels in the western GOA, delivering to Sand Point and King Cove, may be more dependent on tenders than the larger vessels which operate east of 157°00' W longitude and deliver primarily to Kodiak shoreside processors.

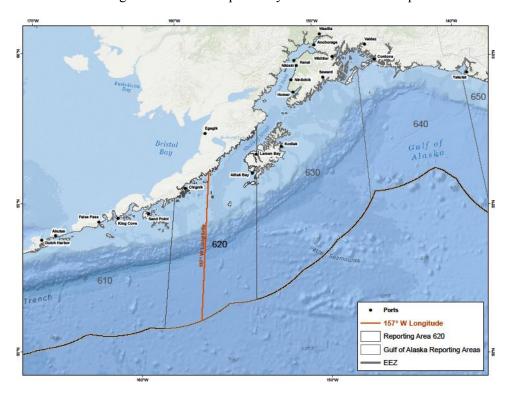


Figure 1 GOA reporting areas with 157° W longitude

In addition to location restrictions for tender vessels in the GOA pollock fishery, the Council also recommended and NMFS implemented restrictions prohibiting tender vessels from retaining more than 600,000 lbs (272 t) of unprocessed pollock that was harvested in the GOA (50 CFR §679.7(b)(3)). The Council recommended this restriction to prevent the large scale use of tender vessels to circumvent the trip limit restriction.

Regulations prohibit catcher vessels and catcher processors from operating as a tender vessel before offloading all groundfish or groundfish product harvested or processed by that vessel. Those same regulations also prohibit catcher vessels and catcher processors from harvesting groundfish while operating as a tender vessel (50 CFR §679.7(a)(17)).

Finally, catcher vessels are prohibited from retaining more than 300,000 lbs (136 t) of unprocessed GOA pollock on board the vessel at any time during a fishing trip (50 CFR §679.6(b)(2)). A fishing trip is defined as the time a vessel starts harvesting groundfish until the offload or transfer of all fish or fish products from that vessel is completed. Catcher vessels are also prohibited from landing more than 300,000 lbs (136 t) of unprocessed pollock harvested in any GOA reporting area to any processor or tender vessel during a calendar day. Finally, catcher vessels harvesting GOA pollock from any reporting

² Area 620 (Central GOA Regulatory Area, Chirikof District) is defined as the area along the south side of the Alaska Peninsula, between 159°00' W longitude and southward to the limits of the U.S. EEZ. Therefore, tenders are allowed to operate in the western portion of area 620, but not east of 157° 00 W longitude.

area are prohibited from harvesting a cumulative amount of unprocessed pollock that exceeds the 300,000 lbs (136 t) multiplied by the number of days the fishery is open to directed fishing.

Observer Tendering Issue

In December 2013, the Council reviewed a discussion paper with options to address how observers monitor and deploy on catcher vessels delivering to tender vessels. After reviewing the discussion paper, the Council initiated a separate analysis to consider revising the regulations by (1) deploying observers for catcher vessels from tenders, and/or (2) allowing catcher vessel observers to monitor deliveries on tenders. In June 2014, in conjunction with review of the final 2013 Observer Annual Report, the Council chose to remove the latter option from the analysis, partly because of the logistical complications of regulating an observer sampling station onboard tender vessels, and partly because the Council was contemplating a GOA trawl bycatch management action with 100 percent observer coverage on all GOA trawl vessels, which would allow other solutions to the problem. As a result, the amendment package was then focused exclusively on changing the definition of a tender trip and deploying observers from tender vessels.

The preliminary 2013 Observer Annual Report, which included data from the first 4 months of the year, noted that the trip length of observed CVs delivering to tender vessels was typically shorter than that of unobserved CVs, implying unrepresentative fishing behavior. This results in a potential bias in the data, as fishing activity on observed CVs may not be representative of fishing activity on unobserved CVs, and may highlight a potential incentive for CVs to stay at sea delivering to tenders when unobserved. However, the final 2013 Observer Annual Report, which included data from the entire 2013 year, did not show a systematic difference in trip length between observed and unobserved CVs. The small number of observed trips for CVs delivering to tender vessels may have been insufficient to clearly capture any difference in trip length, and there may also have been differences on a seasonal time period that were not apparent in evaluating data for the entire year.

Analysis conducted in the 2014 annual report did not find any indication that observed vessels delivering to tenders were making shorter trips or fishing in different areas than unobserved vessels delivering to tenders.³ These findings are consistent with the findings in the 2013 annual report. However, small sample sizes and the difficulty in identifying all deliveries to tenders in the landings data may be limiting the data available for this analysis.

Despite the findings in the Observer Program annual reports, the Council and NMFS continue to receive anecdotal information that CV operators are purposely taking longer trips (and making more deliveries) when unobserved and delivering to tenders, in order to avoid ending the fishing trip and becoming eligible again for selection for observer coverage. Stakeholders have expressed concern that the definition of a tender trip represents a loophole that needs to be resolved. Although analyses to date have not identified this as a potential source of bias in the observer data, as noted above, small sample sizes and the difficulty in identifying all deliveries to tenders in the landings data may be limiting the data available for this analysis.

At the February 2016 meeting, Council staff will present a discussion paper that provides a revised suite of staff-recommended alternatives, both regulatory and non-regulatory, that could potentially address the data bias concern that initiated the action in December 2013.

³ See page 11 of the Executive Summary and Table 3.11 of the 2014 Observer Program Annual Report.

GOA Tender Activity from 2010 to 2015

Behavioral shifts in delivery patterns have been reported to the Council through public testimony, but cannot be discerned in the available data. This section identifies the available GOA tendering activity data, including overall catch and landings in the GOA pollock and Pacific cod fisheries, amount of the catch that is tendered, and the community to which it is delivered, and numbers of vessels and processors that are involved in tendering operations. The harvest information provided in the tables is for all gears, but most of the harvested pollock shown in the tables was caught by the trawl sector.

Table 1 and Table 2 and provide catcher vessel deliveries of GOA pollock and Pacific cod to Kodiak shoreside processors and non-Kodiak processors (shoreside processors, motherships, and catcher processors) from 2010 through 2013. The table includes pollock and Pacific cod deliveries to tenders that were delivered to shoreside processors (see Table 4 and Table 5 for further information on GOA tender activity).

As seen in Table 1, most of the GOA pollock harvested by catcher vessels since 2010 has been delivered to Kodiak shoreside processors – about 80 percent of all GOA Pollock harvested in areas 610, 620, and 630. The portion of GOA pollock delivered to Kodiak increased from 2012 to 2014, but decreased in 2015. Prior 2013, the portion of GOA pollock delivered to Kodiak represented 63 percent of the catch delivered to shoreside processors in 2010, and 70 percent in 2011, and 68 percent in 2012. The proportion increased annually starting in 2013, with 83 percent of the tendered GOA pollock catch delivered to a shoreside processor located in Kodiak, and 86 percent in 2014. That trend continued in 2015 with roughly 96 percent of the 70,080 t total A and B season pollock delivered to Kodiak processors.

In the Central GOA (areas 620 and 630), pollock deliveries from 2010 through 2015 were primarily to Kodiak, with an average 90 percent of area 620 and 97 percent of area 630 harvested pollock delivered to Kodiak shoreside processors. The change in proportion of pollock delivered to Kodiak processors described in the above paragraph was the result of a substantial increase in deliveries to other locations in areas 620 and 630. In 620, the average pollock catch delivered to other processors averaged 1,646 t annually from 2010 to 2014, representing an average of 7 percent of the annual pollock harvest delivered to shoreside processors. That number decreased to 2,991 t in 2015, or 4 percent of the annual pollock harvest delivered to shoreside processors.

630 exhibited a similar trend. Between 2010 and 2014, an average of 283 t (2 percent) was delivered to non-Kodiak processors. In 2015, the number deliveries were below average at 173 t (1 percent).

In contrast, area 610 pollock deliveries were heavily skewed toward non-Kodiak processors in both A and B, and C and D seasons. Specific proportions of for area 610 pollock deliveries by community could not be provided because less than three Kodiak processors took deliveries of area 610 pollock, and as a result, the data are considered confidential.

Table 1 Annual metric tons of GOA pollock catch by season and reporting area delivered to Kodiak shoreside processors and non-Kodiak shoreside processors from 2010 through 2015

	Location of Shoreside		Season pollo			eason pollo		
Year	Processor	610	620	630	610	620	630	Grand Total
	Kodiak	48	18,719	7,286	4	8,453	10,788	45,299
2010	Other	9,723	639	38	16,185	204	260	27,049
2010	Total	9,771	19,358	7,325	16,189	8,657	11,048	72,348
	Kodiak	<1	26,174	6,213	-	8,362	12,485	53,234
2011	Other	8,381	1,179	21	12,090	399	268	22,339
	Total	8,382	27,353	6,234	12,090	8,761	12,753	75,573
	Kodiak	-	30,255	7,370	-	10,505	17.458	65,589
2012	Other	8,579	643	6	18,775	3,193	254	31,452
	Total	8,579	30,898	7,376	18,775	13,698	17,713	97,040
	Kodiak	-	32,336	8,552	-	14,560	18,323	73,772
2013	Other	5,877	3,579	133	1,767	2,127	1,125	14,609
	Total	5,877	35,915	8,686	1,767	16,688	19,448	88,381
	Kodiak	-	54,801	13,445	-	23,233	27,814	119,294
2014	Other	4,176	3,463	13	9,051	1,029	716	18,448
	Total	4,177	58,264	13,458	9,051	24,262	28,530	137,742
	Kodiak	-	67,089	13,061	12	10,166	38,464	128,747
2015	Other	2,189	2,991	173	26,461	693	345	32,853
	Total	2,189	70,080	13,189	26,474	10,859	38,809	161,600

⁻ Denotes no data

Source: NMFS Alaska Region Catch Accounting System, data compiled by AKFIN in Comprehensive_BLEND_CA

In Table 2, overall GOA Pacific cod delivery patterns by catcher vessels during 2010 through 2015 were more evenly distributed between Kodiak and non-Kodiak communities with an average of 57 percent of GOA Pacific cod (areas 610, 620, and 630) delivered to Kodiak during 2010 through 2015. The GOA average does not necessarily represent area-specific delivery patterns given that almost all of the area 610 Pacific cod was delivered to non-Kodiak processors. For areas 620 and 630, a large majority of the harvested Pacific cod was delivered to Kodiak shoreside processors.

Table 2 shows that starting in 2012, a shift in delivery patterns for area 620 Pacific cod during the A season. In 2010 and 2011, 18 percent and 12 percent of the area 620 A season Pacific cod was delivered to non-Kodiak processors. In 2012 and 2013, 50 percent and 52 percent of area 620 A season Pacific cod was delivered to non-Kodiak processors. In 2014, the amount area 620 A season Pacific cod delivered to non-Kodiak processors increased to 61 percent. However, the proportion of 620 A season Pacific cod delivered to shoreside processors decreased to 21 percent in 2015. This change in the delivery pattern of area 620 Pacific cod during the A season is the result of few new entrants to area 620 and expanded effort by current area 620 participants that deliver their area 620 harvest outside of Kodiak. The B season has not seen this shift in deliveries.

Table 2 Annual metric tons of GOA Pacific cod catch by season and reporting area delivered to Kodiak shoreside processors and non-Kodiak shoreside processors from 2010 through 2015

V	Location of		eason Pacific	•		eason Pacifi		Out of Table
Year	Shoreside Processor	610	620	630	610	620	630	Grand Total
	Kodiak	=	3,261	15,092	2	1,151	8,147	27,653
2010	Other	10,306	736	1,726	5,118	52	168	18,105
	Total	10,306	3,996	16,818	5,120	1,203	8,316	45,758
	Kodiak	=	2,091	15,427	8	3,070	11,301	31,898
2011	Other	10,740	297	1,512	5,423	132	651	18,756
	Total	10,740	2,388	16,939	5,431	3,203	11,952	50,654
	Kodiak	-	2,921	16,546	5	2,202	7,164	28,838
2012	Other	10,123	2,919	2,279	4,474	227	497	20,519
	Total	10,123	5,840	18,825	4,479	2,429	7,661	49,357
	Kodiak	-	3,131	12,421	89	1,448	5,060	22,149
2013	Other	10,634	3,457	1,402	5,136	135	108	20,873
	Total	10,634	6,588	13,823	5,226	1,583	5,168	43,022
	Kodiak	-	2,899	13,215	20	2,268	7,948	26,349
2014	Other	11,054	4,605	1,263	5,854	600	97	23,474
	Total	11,054	7,504	14,478	5,874	2,868	8,045	49,823
	Kodiak	2	4,652	13,011		2,472	7,527	27,663
2015	Other	12,335	1,274	2,921	1,870	123	132	18,656
	Total	12,337	5,925	15,932	1,870	2,595	7,659	46,319

⁻ Denotes no data

Source: NMFS Alaska Region Catch Accounting System, data compiled by AKFIN in Comprehensive_BLEND_CA

Table 3 provides estimates of catcher vessel delivers of GOA pollock and Pacific cod to tender vessels from 2010 through 2015. Most apparent in the GOA pollock fisheries is the inconsistent use of tenders across the three GOA areas. Likely the inconsistency is due to the prohibition on tendering pollock east of 157°00' W longitude. The tendering prohibition was the result of the Steller sea lion protection measures in 2001 to reduce the speed of the pollock fishery.

In general, very little area 630 pollock was delivered to tenders⁴, while area 610 catcher vessels have consistently utilized tenders in the pollock fishery. Pollock tendering activity in area 620 is more of a mixed bag. Prior to 2012, the use of tender vessels was limited. However, in 2012, tendering increased. In 2011, only 28t of area 620 pollock was tendered. In 2012, the amount of area 620 pollock delivered to tenders increased to 2,237 t, with most delivered in September. In 2013, approximately 4,040 t of area 620 pollock was delivered to tender vessels, with most of the deliveries taking place during the month of March. 2014 saw a reduction in tendering activity. During that year, 1,395 t of area 620 pollock was delivered to tender vessels. In 2015, there was a 176 t increase in 620 pollock catch delivered to tender vessels from the year before for an area annual total of about 1,571 t.

In the GOA Pacific cod fishery, tendering activity was more consistent across all three areas since Steller sea lion regulations do not prohibit the use of tenders east of 157° 00' W longitude for Pacific cod. In area 610, tendered Pacific cod ranged from 7,938 t in 2012 to 14,488 t in 2015. Area 620 Pacific cod ranged from 5,573 t in 2010 to 8,885 t during 2014. Deliveries of area 630 Pacific cod to tender vessels ranged from 2,811 t in 2010 to 6,592 t in 2012.

⁴ In this paper, the location of all tenders receiving GOA pollock deliveries are west of 157° 00' longitude.

Table 3 Annual metric tons of GOA pollock and Pacific cod (combined state and federal catch) by reporting area delivered to tender vessels from 2010 through 2015

Vaca	G	OA pollock catch	(t)	GOA Pacific cod catch (t)			
Year	Area 610	Area 620	Area 630	Area 610	Area 620	Area 630	
2010	*	3	*	*	5,573	2,811	
2011	6,233	28	-	7,938	5,856	4,761	
2012	13,013	2,237	*	8,073	6,004	6,592	
2013	3,904	4,040	*	10,605	8,157	3,137	
2014	4,469	1,395	*	11,952	8,885	3,418	
2015	7,685	1,571	4	14,488	8,545	2,650	

^{*} Denotes confidential data

Source: NMFS Alaska Region Catch Accounting System, data compiled by AKFIN in Comprehensive_BLEND_CA

Once pollock and Pacific cod have been delivered to tender vessels, the fish is delivered to shoreside processors for processing. Table 4 provides deliveries of tendered area 620 pollock and Pacific cod to shoreside processors by community. Unfortunately, much of the information in Table 4 is masked to protect confidential data. In general, during the 2010 through 2015 period most of the tendered pollock is delivered to non-Kodiak processors, while deliveries of tendered area 620 Pacific cod tends to be more evenly divided between Kodiak, Sand Point, King Cove, and Akutan shoreside processors. The table also includes tendered deliveries to floating processors.

⁻ Denotes no data

Table 4 Annual metric tons of GOA area 620 pollock and Pacific cod catch delivered by tenders to processors by community from 2010 through 2015

			Pollock	F	Pacific cod
Year	Community	Catch (t)	Number of processors receiving pollock	Catch (t)	Number of processors receiving Pacific cod
	Kodiak	*	3	2,583	5
2212	Sand Point	-	=	*	1
2010	Floating Processors	*	1	*	1
	Total	3	4	5,573	7
	King Cove	*	1	*	1
	Kodiak	*	3	3,231	6
2011	Sand Point	-	=	*	1
	Floating	*	1	*	1
	Processors Total	28	5	5,856	9
	King Cove	*	1	*	1
	Kodiak	*	2	3,729	4
2012	Sand Point	*	1	*	1
2012	Floating Processors	-	-	2,200	3
	Total	2,238	4	6,004	9
	Akutan	*	1	*	1
	King Cove	*	1	*	1
	Kodiak	*	3	3,626	5
2013	Sand Point	*	1	*	1
	Floating Processors	*	1	*	2
	Total	4,040	7	8,157	10
	Akutan	*	1	*	1
	King Cove	*	1	*	1
	Kodiak	22	4	3,626	5
2014	Sand Point	*	1	*	1
	Floating Processors	*	1	*	1
	Total	1,397	8	10,087	9
	King Cove	*	1	*	1
	Kodiak	*	3	*	3
2045	Sand Point	*	1	*	1
2015	Floating Processors	-	-	*	1
	Unassigned	*	1	*	1
* Danatas	Total	1,572	6	8,618	7

^{*} Denotes confidential data

Source: NMFS Alaska Region Catch Accounting System, data compiled by AKFIN in Comprehensive_BLEND_CA

Table 5 and Table 6 provide annual counts of tender vessels, processors, and catcher vessels harvesting GOA pollock and Pacific cod by reporting area and GOA wide that was tendered. Most apparent in Table 5 is the increase in the number of tenders receiving deliveries of area 620 pollock during 2013. Prior to 2013, the maximum number of tenders receiving area 620 pollock was ten in 2012, but during 2013, 25 tenders received area 620 pollock. The number of catcher vessels delivering area 620 pollock also increased during the 2013 fishing year from 21 vessels in 2012 to 47 vessels in 2013. In 2014, the number of tenders declined to 14 and the number of catcher vessels delivering to tenders also declined to 39. There number of tender vessels increased by two in 2015 to a total of 16, while the number of catcher vessels decreased to 21. Information in the table also reflects patterns noted in Table 3 with regards to

⁻ Denotes no data

area 610 and area 630 tendering activity. For area 610 pollock, vessel counts indicate wide use of tendering vessels, while the numbers of tendering vessels receiving area 630 pollock are few.

Table 5 Annual counts of tenders, shoreside processors, and catcher vessels prosecuting tendered GOA pollock by reporting area from 2010 through 2015

Year	Area 610			Area 620				Area 630		(GOA Wide	
rear	Tender	Processor	CV	Tender	Processor	CV	Tender	Processor	CV	Tender	Processor	cv
2010	11	3	40	7	4	19	3	2	11	11	7	57
2011	13	4	35	9	5	9	6	4	13	20	10	54
2012	20	5	43	10	4	21	5	3	16	24	9	56
2013	19	4	45	25	7	47	5	3	10	31	8	74
2014	25	5	43	14	8	39	6	4	18	27	10	73
2015	17	7	42	16	6	21	8	4	16	27	9	64

Source: NMFS Alaska Region Catch Accounting System, data compiled by AKFIN in Comprehensive BLEND_CA

In Pacific cod fishery, the number of tenders in all three reporting areas illustrates their wide use throughout GOA. The number of tenders receiving area 610 Pacific cod has ranged from a low of 13 in 2010 to a high of 31 in 2014. For area 620 Pacific cod, the number of tenders has ranged from a low of 14 in 2010 to a high of 35 in 2013. Finally, the number of tenders receiving area 630 Pacific cod has ranged from 10 in 2010 to a high of 18 in 2012.

Table 6 Annual counts of tenders, shoreside processors, and catcher vessels prosecuting tendered GOA Pacific cod by reporting area from 2010 through 2015

Vaar	610			620				630			GOA Wide	
Year	Tender	Processor	CV	Tender	Processor	CV	Tender	Processor	CV	Tender	Processor	CV
2010	13	3	53	14	7	42	10	6	38	19	12	101
2011	15	6	58	19	9	47	16	7	77	34	17	162
2012	25	7	74	29	9	92	18	7	142	41	14	213
2013	22	6	61	35	10	105	13	6	58	39	13	158
2014	31	7	68	30	9	83	11	6	50	38	14	133
2015	25	5	72	28	7	61	10	4	47	35	11	127

Source: NMFS Alaska Region Catch Accounting System, data compiled by AKFIN in Comprehensive_BLEND_CA

Table 7 and Table 8 provide monthly counts of tenders, processors, and catcher vessels prosecuting GOA pollock and Pacific cod by reporting area from 2010 through 2015. Unlike annual data provided in the previous tables, the information in these two tables highlights the increase in activity during the month of March 2013 for both area 620 pollock and area 620 Pacific cod relative to the two previous months. Specifically, Table 7 shows that in March of 2013, 17 tenders received area 620 pollock from 31 catcher vessels. In contrast, February 2013 saw 15 catcher vessels delivering area 620 pollock to 5 tender vessels. In March 2014, there were 12 tenders receiving area 620 pollock from 23 catcher vessels. Also noticeable in Table 7 is an increase in tendering activity in September 2012 relative to tendering activity in the two years prior. During that September 2012 period, 10 catcher vessels delivered area 620 pollock to six tender vessels. This increase in tender activity in the fall fishery did not repeat itself in 2013 or 2014. As for monthly tendering activity in other areas, Table 7 shows large numbers of catcher vessels delivering area 610 pollock to large numbers of tenders throughout the 2010 to 2015 period, while very few tenders received area 630 pollock during this period. 2015 marked a three-year low for 620 CVs

delivering to tender vessels in January, February, and March, and was relatively consistent with the preceding years in 610.

Table 7 Monthly counts of tenders, processors, and catcher vessels prosecuting GOA pollock by reporting area from 2010 through 2015

V	Mandh		610			620			630	
Year	Month	Tender	Processor	CV	Tender	Processor	CV	Tender	Processor	CV
	1	3	1	8	4	4	13	2	2	8
	2	6	2	27	2	2	3	1	1	2
	3	6	2	15	-	-	-	-	-	-
2010	4	4	3	10	-	-	-	-	-	-
	8	5	1	8	-	-	-	-	-	-
	9	5	2	11	1	1	3	-	-	-
	10	5	1	11	-	-	-	-	-	-
	1	1	1	4	5	4	6	2	1	1
	2	6	2	20	2	1	1	3	2	8
	3	9	2	31	1	1	1	-	-	-
2011	4	-	-	-	-	-	-	1	1	1
	8	6	2	6	-	-	-	-	-	-
	9	8	2	18	1	2	1	2	2	3
	10	5	1	12	-	<u>-</u>		-	-	-
	1	3	2	4	2	1	5	5	3	12
	2	6	2	11	4	3	7	3	2	9
0040	3	7	3	19	-	-	-	-	-	-
2012	4	1	1	5	-	-	-	-	-	-
	8	11	3	19	-	-	-	-	-	-
	9	11	3 4	18	6	3 2	10	-	-	-
	10	10 8	2	18 26	4	3	4	2	<u>-</u> 1	4
	2	8	2	18	5	4	15	3	2	5
	3	12	4	33	17	6	31	3	2	8
2013	4	-	-	-	-	-	-	1	1	1
2013	8	-	-	-	2	1	3	-	- -	-
	9	3	1	3	2	1	1	_	-	_
	10	2	1	4	-	-	-	-	-	-
	1	7	3	26	3	2	8	2	1	5
	2	9	3	23	5	4	12	3	2	9
	3	13	3	21	12	7	23	4	3	5
	4	6	2	7	1	1	1	1	1	1
2014	5	-	-	-	1	1	3	1	1	1
	8	8	2	9	-	-	-	-	-	-
	9	9	2	15	1	1	1	1	1	1
	10	2	1	3	1	1	1	1	1	3
	11	-	-	-	1	1	2	-	-	-
	1	5	3	18	6	2	7	4	2	9
	2	8	5	25	5	3	7	4	2	10
	3	9	2	34	5	4	11	3	3	6
2015	4	4	2	6	2	1	3	-	-	-
	8	4	1	5	-	-	-	-	-	-
	9	5	1	5	2	1	2	1	1	1
	10	2	1	4	1	1	2	-	-	-

- Denotes no data

Source: NMFS Alaska Region Catch Accounting System, data compiled by AKFIN in Comprehensive_BLEND_CA

Monthly tendering activity for the GOA Pacific cod fishery (Table 8) indicates wide use of tenders in all three areas. For deliveries of area 610 and area 630 Pacific cod to tender vessels, the information in Table 8 indicates consistent trends in tendering activity. However, tendering activity for area 620 Pacific cod

increased in 2013. In March 2013, 23 tender vessels received area 620 Pacific cod from 55 catcher vessels, which is a substantial increase from previous months. The largest number of tender vessels active in any given month prior to March 2013 was 13 in September 2012. In 2014, 16 tenders received 620 Pacific cod from 41 catcher vessels. There were no major changes in 2015.

Table 8 Monthly counts of tenders, processors, and catcher vessels prosecuting GOA Pacific cod by reporting area from 2010 through 2015

V	Mande		610			620			630	
Year	Month	Tender	Processor	CV	Tender	Processor	CV	Tender	Processor	CV
	1	3	1	12	5	5	16	5	4	17
	2	7	3	33	3	3	5	5	4	13
	3	7	3	29	4	2	11	-	-	-
2010	4	4	3	10	4	2	12	-	-	-
2010	5	-	-	-	-	-	-	1	1	10
	8	5	1	8	-	-	-	-	-	-
	9	5	2	19	1	1	3	1	1	3
	10	5	1	11	1	1	2	-	-	-
	1	2	2	7	6	5	6	5	5	9
	2	8	3	41	3	3	3	6	5	26
	3	12	4	39	7	5	22	4	3	17
	4	-	-	-	1	1	3	4	3	14
2011	8	6	2	6	-	-	-	-	-	-
	9	9	3	22	1	2	3	9	6	29
	10	6	2	14	2	2	3	3	3	5
	11	-	-	-	1	1	2	-	-	-
	12	- F	-	-	- E	4	7	9	1	3
	1	5	3	9	5		7	-	5	43
	2	7	3 5	23 38	10 11	6 7	22 21	10 7	5 4	67 41
	3 4	2	າ 1	8	4	2	21	4	2	55
	5	-	- '- -	-	2	2	6	3	2	22
2012	6	-	-	-	_	<u>-</u>	-	1	1	1
	8	11	3	19	-	-	-	-	-	-
	9	12	4	27	13	7	18	8	5	17
	10	10	4	18	7	5	11	3	2	4
	11	-	-	-	1	1	2	1	1	1
	1	10	3	36	7	5	10	8	5	18
	2	8	2	18	9	7	30	8	4	31
	3	15	6	44	23	9	55	11	6	42
2013	4	-	-	-	1	1	5	3	3	7
	8	-	-	_	2	1	3	-	-	-
	9	3	1	3	2	1	1	-	-	-
	10	2	1	4	-	-	-	_	-	-
	1	7	3	26	5	4	11	5	4	11
	2	9	3	23	8	5	20	6	5	26
	3	14	5	40	16	7	41	6	6	18
	4	6	2	7	3	3	7	2	2	8
	5	-	-	-	1	1	9	1	1	8
2014	6	-	-	-	-	-		1	1	1
	8	8	2	9	2	1	1	-	-	-
	9	11	4	17	3	3	4	2	3	3
[10	3	2	7	2	1	3	2	1	3
	11	-	-	-	1	1	2	-	-	-
	12	-	-	-	-	-	-	1	1	1
	1	9	4	25	8	4	11	6	3	17
	2	9	5	31	7	4	17	7	3	19
	3	15	5	50	16	6	36	8	4	24
	4	5	4	10	3	2	6	1	1	10
2015	8	4	1	5	-	-	-	-	-	-
	9	5	1	5	5	2	4	1	1	1
	10	2	1	4	1	1	2	1	1	1
	11	-	-	-	-	-	-	1	1	1
	12	-	-	-	1	1	1	-	-	-

- Denotes no data

Source: NMFS Alaska Region Catch Accounting System, data compiled by AKFIN in Comprehensive_BLEND_CA

Table 9 shows the amount of GOA pollock by area that was delivered to tenders by length of the catcher vessels from 2010 through 2015. As depicted in the table, during the 2010 and 2011 fishing years, very little area 620 pollock was tendered. However, 2012 and 2013 saw an increase in tender area 620 pollock.

In 2012, the 30'-59' vessel length group delivered 1,908 t of area 620 pollock to tenders, and the 60'-89' and 90'-124' vessel length groups delivered pollock to tenders, but is masked for confidentiality. In 2013, it was the 90'-124' vessel size group that tendered the most area 620 pollock at 1,943 t followed by the 60'-89' vessel size group at 1,916 t and the 30'-59' vessel size group at 181 t. In 2014, there was declined in the amount of area 620 pollock tendered by each vessel size group from the previous year. 2015 marked a three-year high for 610 catch delivered to tender vessels with 7,685 t, and the entirety of the catch was delivered by CVs 30-59 feet LOA.

Table 9 Catcher vessel deliveries of GOA pollock (t) to tenders by vessel length and GOA area

Year	Vessel LOA (feet)	Area 610	Area 620	Area 630
	<30	=	=	-
2010	30-59	*	2	*
2010	60-89	*	<1	*
	90-124	-	-	-
	2010 Total	8,084	2	<1
	<30	-	-	-
2011	30-59	*	*	*
2011	60-89	-	*	*
	90-124	*	-	-
	2011 Total	6,233	28	<1
	<30	-	-	-
2012	30-59	10,733	1,908	*
2012	60-89	914	*	*
	90-124	1,365	-	-
	2012 Total	13,013	*	14
	<30	-	-	-
0040	30-59	2,883	181	*
2013	60-89	*	1,916	*
	90-124	*	1,943	
	2013 Total	3,904	4,040	3
	<30	-	-	-
2044	30-59	*	*	4
2014	60-89	*	748	*
	90-124	*	400	-
	2014 Total	4,469	*	*
	<30	-	-	-
2045	30-59	7,685	159	4
2015	60-89	-	1,024	*
	90-124	-	*	-
	2015 Total	7,685	*	*

^{*} Denotes confidential data

Source: NMFS Alaska Region Catch Accounting System, data compiled by AKFIN in Comprehensive_BLEND_CA

Table 10 provides the number of AFA vessels that operate as tender vessels in the area 620 pollock fishery. As shown in the table, in 2010 there were no AFA vessels were operating as tenders in the area 620 pollock fishery, but in the subsequent years, the use of AFA vessels as tenders increased. In 2013, 9 AFA vessels operated as tenders with total tendered amount of 3,593 t. During the 2014 season, the number of AFA vessels operating as tenders in the area 620 pollock fishery declined to one. Catch data

⁻ Denotes no data

for that vessel would not be published due confidential data restrictions. There were no AFA vessels operating as tender vessels in the area 620 pollock fishery in 2015.

Table 10 Annual count and catch (t) of area 620 pollock delivered to AFA and non-AFA vessels operating as tender vessels from 2010 through 2015

Vaca	AFA V	essels	Non-AFA Vessels			
Year	Number	Catch (t)	Number	Catch (t)		
2010	-	-	5	3		
2011	-	-	7	28		
2012	-	-	9	2,238		
2013	9	3,593	12	447		
2014	1	*	11	1,113		
2015	-	-	15	1,572		

NMFS Alaska Region Catch Accounting System, data compiled by AKFIN in Comprehensive_BLEND_CA

Figure 2 provides weekly catch of area 620 pollock from 2010 through 2015. As indicated in Figure 2, the pace of the area 620 pollock fishery increased during the first few weeks of the 2010 through 2013 period, but slackened slightly in 2014. During the five years shown in Figure 2, a majority of the area 620 pollock catch occurs during week 8, 11, and 12. In 2013, the fishery started in earnest even earlier with a significant amount of catch during week 5, and nearly all of the tendering of area 620 pollock during the 2013 fishing year occurred in week 11. For 2014, the fishery did not start in earnest until week 7 and remained strong through week 14. The trend continued in 2015 with increased catch starting in week 7, and peak harvests in weeks 8, 13, and 14.

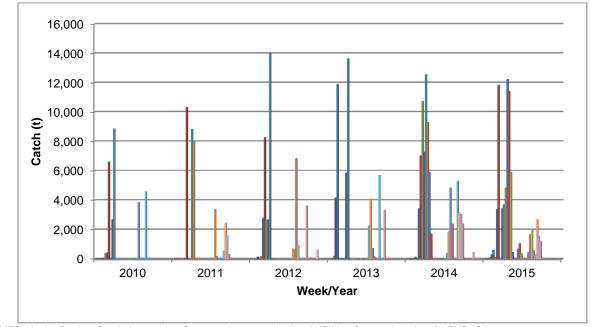


Figure 2 Weekly harvest of area 620 pollock from 2010 through 2015

NMFS Alaska Region Catch Accounting System, data compiled by AKFIN in Comprehensive_BLEND_CA

2015 Data Summary

- 620 pollock catch delivered to tender vessels:
 - o Increased from 1,395 in 2014 to 1,571 t in 2015
 - o Number of tender vessels increased from 14 in 2014 to 16 in 2015
- The amount of area 620 Pacific cod delivered to tender vessels has remained relatively unchanged from the previous two years
- No AFA vessels operated as tender vessels for pollock in 2015.
- 620 A and B season pollock catch delivered to shoreside processors:
 - o Kodiak received largest amount of catch since 2010 (67,089 t)
 - O Non-Kodiak received smallest amount since 2010 (2,991 t)
- 620 A season Pacific cod delivered to shoreside processors:
 - o Kodiak received the largest amount since 2010 (4,652 t)
 - o Non-Kodiak processors received the smallest amount since 2012 (1,274 t)
- 620 B season Pacific cod deliveries have been consistent from 2010 through 2015