


MEMORANDUM

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke 
Executive Director

DATE: September 15, 1995

SUBJECT: Initial Review of Halibut Grid-Sorting Regulatory Amendment

ESTIMATED TIME 6 Hours (for all D-4 items)
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ACTION REQUIRED

Approve the regulatory amendment for grid-sorting of Pacific halibut in the non-pelagic trawl groundfish fisheries for public review.

BACKGROUND

In October 1993, the International Pacific Halibut Commission (IPHC), Highliners Association, and NMFS-AFSC conducted an experiment to evaluate methods of increasing survival of halibut taken as bycatch in bottom trawls. The experiment, conducted aboard the *F/T Northern Glacier*, sorted halibut from the groundfish catch more rapidly than currently practiced and evaluated subsequent changes in discard mortality rates.

In June 1994, the IPHC staff presented a report of the results and implications of the study. The Council recommended preparation of a regulatory amendment for grid-sorting of Pacific halibut in the non-pelagic trawl groundfish fisheries.

During Council review in January 1995, the SSC requested that the analysis address the effects of grid sorting on: (1) bias and variability of catch and bycatch estimates; (2) the viability of the VIP program; and (3) calculation of vessel and across vessel halibut bycatch. The Council delayed release of the document to the public so that an ad hoc working group could be convened to recommend changes to expand and clarify the potential improvement for halibut mortality rates in the analysis.

The revised analysis was mailed to you on September 15 for review. It includes revisions recommended by the SSC (Item D-4(a)(1)) and the ad hoc working group (Item D-4(a)(2)). The alternatives analyzed are:

Alternative 1. Status quo. Normal sorting in the factory below deck. Typically, a single, short conveyer leads from the hold to the exit chute.

Alternative 2. Require that the deck crew on all factory trawlers and catcher boats that dump groundfish directly to a stern tank before sorting use a grid over the entrance to the hold and sort out as much halibut bycatch as practicable for immediate return to the sea. Specific fisheries may be selected. The grid will be 9 by 11 inches.

- OPTION 1. Require vessels to grid-sort all halibut, but observers would not collect data for grid-sorted halibut.
- OPTION 2. Require vessels to grid-sort only the hauls that the observer does not intend to sample.
- OPTION 3. Require vessels to grid-sort all hauls, and observers count, measure, and determine viability on a subsample of grid sorted halibut.
 - SUBOPTION 1. Vessel deck crews would be required to sort halibut for the entire catch, regardless of time to sort.
 - SUBOPTION 2. Vessel deck crews would be required to sort halibut only for the first 20 minutes of dumping, and could not sort after 20 minutes; the observer would be on deck for all sorting.
 - SUBOPTION 3. Vessel deck crews would be required to grid-sort halibut on deck only for the first 20 minutes of dumping, and additional sorting would be voluntary; the observer would be on deck for all sorting.

Enforcement Committee Comments

November 28-29, 1994: (1) The Enforcement committee concluded that a requirement for grid-sorting of halibut by all trawlers could be enforced more effectively than requirements for specific fisheries.

(2) A safety issue concerning a possible requirement to weld the grid in place was raised. The inability to offload by smaller boats with the grid in place was discussed. The committee indicated that compliance concerns would be minimized if the grid was welded in place. However, vessel safety might be compromised because some small vessels could become unstable if large catches cannot be dumped below the deck quickly; offloading would be made very difficult if sorting grids were welded in place.

(3) The committee was greatly concerned with the obvious conflict grid-sorting has with the Vessel Incentive Program, which requires standardized observer sampling of the entire catch. Pre-sorting of halibut precludes sampling protocols required for the VIP.

(4) The program may foster additional noncompliance with VIP, and increase handling mortality, if a captain believes that the grid will sort out unwanted halibut bycatch. The committee acknowledged that the grid facilitates pre-sorting of the catch by slowing its transfer below deck, but does not sort the catch directly.

(5) Fishery-specific grid-sorting requirements may be difficult to enforce because target fishery can not be identified by catch composition until the end of the fishing week.

(6) A grid sorting requirement will increase sampling and compliance monitoring responsibilities for observers. To accommodate this, some current sampling activities would have to be reduced, or additional observers would be required. The requirement could also increase observer exposure to safety hazards and sampling interference. Delays in initiation of factory processing would occur because observers would have to complete on-deck sampling before beginning data collection in the factory. The committee agreed that the Council should address these concerns in evaluating appropriate action on grid sorting.

(7) Since NMFS still supports VIP, the Council may need to balance the benefits of that program with the potential benefits of decreased halibut bycatch mortality and increased groundfish catches associated with the grid sorting requirement. The Council may wish to encourage continued research into alternative methods of reducing halibut discard mortality.

April 18, 1995: The committee confirmed their earlier comments regarding the grid-sorting proposal, recognizing that grid welding requirements were unlikely.

EXCERPTED FROM SSC MINUTES
JANUARY 1995

D-2(a) HALIBUT GRID-SORTING AMENDMENT

Bob Trumble (IPHC) summarized the contents of this proposed amendment and Bill Karp (NMFS) provided additional information in regard to the Observer Program. We also received public testimony from Shari Gross and Steve Hughes. This document was given to the SSC upon its arrival, and the SSC was unable to carefully review the analysis. During its discussions the following issues surfaced:

1. Some of the options under consideration could result in biased estimates of both fleet-wide and individual vessel bycatches. The document should contain a thorough discussion of bias under the various options. A table summarizing the effects of grid-sorting on bias and variability would also be helpful. Trumble suggested that special projects might be used to determine adjustment factors to alleviate bias. The document should contain a description of such projects.
2. With respect to the effects of grid sorting on the VIP program, modification of sampling procedures would be required to maintain the viability of the program. The feasibility of revising these procedures should be examined.
3. If grid-sorting is implemented, it is unclear how halibut discard mortality will be calculated for each vessel and across vessels. At a minimum, stratification of the data collected above deck and below deck will probably be necessary. The document should describe the estimation procedure that will be used to calculate discard mortality at the vessel and fleet levels.
4. The discard mortality from the grid-sorting experiment (66%) should be compared with the recommended rate for the non-pelagic trawl pollock fishery (77%) rather than the rate for the Pacific cod fishery (65%). This is because the experiment more closely resembled the former fishery.

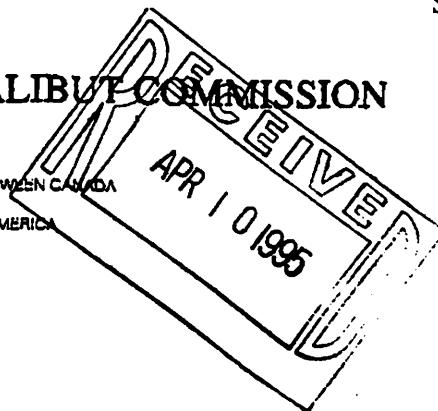
These issues should be addressed before the document is released for public review.

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MEMO

To: Rick Lauber, Chair

April 10, 1995

From: ^{RJT} Bob Trumble, Halibut Grid-sorting Ad Hoc Working Group

Subj: Revisions to EA/RIR for Regulatory Amendment for grid-sorting

At the direction of the Council, the drafting team for the EA/RIR for a Regulatory Amendment to require grid-sorting revised the document originally presented to the Council in January 1995. The Council, SSC, and AP provided a series of concerns to be addressed in the new draft. The Ad Hoc Working Group for grid-sorting reviewed the new draft by teleconference on February 17. The Work Group asked for some minor clarifications that have been incorporated into the draft now available for the Council. In general, the Work Group found that the revised draft satisfactorily answered the concerns, and may be sent out for public review.

The Work Group also discussed alternatives that could augment grid-sorting, or that could replace it. Five alternatives recommended for further review are: 1) Bycatch would not be monitored for a short time after the codend comes on board (a discard window); 2) Require all factory trawlers to have a conveyor from the holding tank directly to a discharge chute (as on the *Northern Glacier*); 3) All observer sampling would occur on deck, rather in the factory; 4) Create industry pools for an incentive program; and 5) Re-examine individual Bycatch Quotas (IBQs).

The new document has been reorganized and expanded to accommodate the necessary changes. The Alternatives, Section 3.4, were moved earlier in the document so that all analyses could more easily be compared against the alternatives. The SSC asked for discussion of the special projects required for Options 1 and 2 of Alternative 2, of the biases and variability associated with the alternatives, and of the way bycatch and bycatch mortality would be calculated under the alternatives. These items are in Section 3.5. Most discussion by the Council and AP involved the need for more justification for reductions in discard mortality rates. Section 3.6 more clearly lays out the rationale for the reductions, evaluating relative changes, absolute changes, and overall changes. Section 3.8 discusses the five alternative to grid-sorting identified by the Work Group. More detail on the IBQ alternative is provided in Appendix 3; this alternative was brought back following a report from Bob Babson, NOAA GC, that penalties under individual incentives need not occur in-season to be effective. Section 5.2.1.4 and Appendix 4 address the SSC request to determine if the VIP program could be revised to be compatible with grid-sorting.

Halibut Grid-Sorting Working Group Panel members:

Bob Trumble - IPHC, chair
Jane DiCosimo - NPFMC
Bill Karp - NMFS Observer Program
Steve Meyer - NMFS Enforcement
Scott Highleyman - AP, AMCC
Shari Gross - HANA
Steve Hughes - UCB.

Also participating in the February 27, 1995 conference call:

Ron Berg, Sue Salvesson, and Russell Kappenman - NMFS
Bob Babson and Susan Auer - NOAA GC
Dave Benson - AP
Brent Paine - UCB