GOA Tendering Report[1]
February 2014

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 processor delivery patterns of GOA pollock and Pacific cod. At the June 2013 meeting, the Council reviewed the tendering activity report. The report 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. After considering the report, the Council tasked staff to update the discussion paper for review at a later meeting with the following information:

- Data from the remainder of the 2013 fishing year
- Proportion of AFA vessels operating as tender vessels in the GOA pollock and Pacific cod fishery
- Information on impacts of tendering GOA pollock and Pacific cod concerning timely catch accounting, and
- Information concerning possible impacts of genetic sampling protocol of tendered GOA pollock.

Since the June 2013 meeting, the Council has also reviewed a separate discussion paper (in December 2013) addressing how observers monitor and are deployed on catcher vessels delivering to tender vessels. The discussion paper was initiated in response to the draft 2014 Observer Annual Deployment (ADP), which identified that tender activity in the GOA may represent an import source of variance and/or bias in catch data from the partial coverage category. First, a potential bias in the catch data could occur if vessels are making extended, unobserved deliveries to a tender, because vessels may be behaving differently when observed versus when unobserved. Second, delivering to tenders interferes with the agency's ability to take salmon genetic samples in the GOA pollock fishery. After reviewing the discussion paper, the Council initiated an analysis of a regulatory amendment to address these issues. Given that the review of possible impacts of tendered GOA pollock on the genetic sampling protocol in that fishery has already been presented to the Council, and the Council has taken action, this paper will not include this information.

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

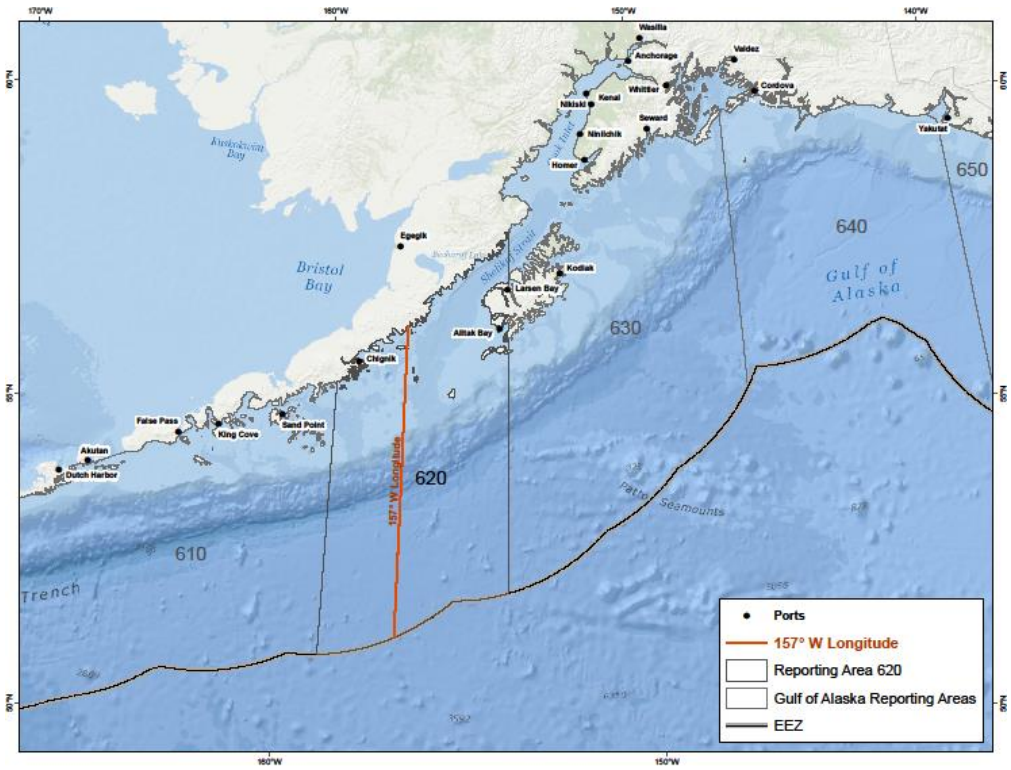
[1] This report was prepared by Jon McCracken (NPFMC), with input from Diana Evans (NPFMC), Mike Fey (AKFIN), Darrell Brannan, Mary Furuness (NMFS Alaska Region), Jennifer Mondragon (NMFS Alaska Region), Josh Keaton (NMFS Alaska Region), Krista Miliani (NMFS Alaska Region), Tom Meyer (NOAA General Counsel),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

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 §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



[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.

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

Anecdotal Information on 2013 Fishery

As noted above, this discussion paper resulted from testimony at the April 2013 Council meeting, which reported an increase in tendering activity in the Central GOA pollock and Pacific cod fisheries, and a shift in processor delivery patterns of GOA pollock and Pacific cod. Tendering is prohibited east of the 157°00' W longitude, and while the use of tenders is common in the western GOA (area 610) pollock and Pacific cod fisheries, most of the Pacific cod and pollock from the central GOA (620 and especially 630) has historically been landed in Kodiak. In the area 620 pollock fishery, in the 2013 B season, it was reported to the Council that the harvesting vessels associated with one Kodiak processor changed their fishing pattern to begin delivering some of their pollock to tender vessels stationed at the 157° line, rather than to the Kodiak plant, and the fish was then transported to the company's other processing plants on the Alaska Peninsula. The company noted it was better utilizing its processing capacity across all plants. Testifiers were concerned because in a race for fish, as in the B season, those companies utilizing tender vessels could have a harvesting advantage over the companies that do not use tenders. The use of tenders allows harvesting vessels to reduce the amount of time traveling from the fishing grounds to the offload site and back to the fishing grounds, and maximize fishing time, which is critical to the success of harvesting vessels and the associated shore processor, especially as the season length is reduced. Stationing tender vessels near the 157° line cuts provides a competitive advantage for those harvesting vessels delivering to the tenders, relative to vessels that have to travel to Kodiak to offload their catch. It was also reported that the recent increase in use of tender vessels in the area 620 pollock fishery, and the delivery of that fish to other Alaska communities, has changed the distribution of landing tax revenue, and economic activity associated with processing pollock, away from Kodiak to other communities.

Since June 2013, when the Council last reviewed this discussion paper, tender activity in 620 has reduced. During the C and D seasons, tenders were not utilized, and 620 pollock was landed in Kodiak. In the C and D seasons, industry avoids a race for fish in the area 620 pollock fishery by instituting a voluntary catch share agreement among participants, for salmon bycatch avoidance, and to control fishing effort to prevent exceeding the area's pollock limit. The catch share agreement apportions area 620 pollock based on the tanking capacity of the vessels participating in the fishery, so processors with the largest fishing fleet have an advantage over processors with a smaller fishing fleet. The same processor that reportedly utilized tenders in the 2013 B season race for fish also has the largest fishing fleet participating in the area 620 pollock fishery. As a result, the Council may continue to hear concerns from members of the fleet

about changing fishing patterns from, since that processor continues to have a harvesting advantage over other processors under either the race for fish or the voluntary catch share plan approach.

With respect to community impacts, anecdotal reports indicate that while the 620 catch was landed in Kodiak in the C and D seasons, some portion of the catch was still transported to processing plants outside of Kodiak, presumably to take advantage of excess processing capacity in those plants. Since the area 620 pollock was landed in Kodiak, the community received the revenue from the landing tax. Other Alaska communities that received area 620 pollock would benefit from the economic activity of processing the pollock.

A factor that could be contributing to the recent tender activity and changes in delivery patterns in pollock and Pacific cod fisheries is the recent Council consideration of a new management regime for the GOA trawl fisheries. The new management regime being considered could potentially allocate allowable harvest to individuals, cooperatives, or other entities, which would mitigate the impacts of a derby-style race for fish. The program may increase the flexibility and economic efficiency of the GOA groundfish trawl fisheries and support the continued direct and indirect participation of the coastal communities that are dependent upon those fisheries. Although control dates have been established for Western and Central GOA while the Council develops the new management regime, any perception of future changes to the control date or changes to the management regime that could reward recent catch history might provide enough of an incentive to change fishing behavior and increase the speed of the fishery in order to increase pollock and Pacific cod catch history.

GOA Tender Activity from 2010 to 2013

Many of the nuances with respect to changing activity in the fishery, which are reported anecdotally to the Council, cannot be discerned in the available data. This section identifies the information that is available, relating to GOA tender activity: 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 using trawl gear.

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 harvested GOA pollock harvested by catcher vessels since 2010 has been delivered to Kodiak shoreside processors. Specifically, from 2010 through 2013, over 71% of the all GOA pollock harvested in areas 610, 620, and 630 were delivered to Kodiak shoreside processors, while remaining proportion of the GOA pollock in these areas were delivered to non-Kodiak processors. In the Central GOA pollock (areas 620 and 630), pollock deliveries from 2010 through 2013 were heavily skewed towards Kodiak, with an average 93% of area 620 and an average 97% of area 630 harvested pollock delivered to Kodiak shoreside processors. In contrast, area 610 pollock deliveries were heavily skewed toward non-Kodiak processors. 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.

As to the reported tendering activity and change in delivery patterns of area 620 pollock during the 2013 fishing year, Table 1 does show a slight change in delivery patterns. During the A and B season of 2013, 90% of area 620 pollock was delivered to Kodiak shoreside processors and 10% was delivered to non-Kodiak processors. In contrast, the three years prior saw 97% of area 620 pollock during the A and B

season delivered to Kodiak shoreside processors and 3% of area 620 pollock delivered to non-Kodiak shoreside processors.

In Table 2, overall GOA Pacific cod delivery patterns by catcher vessels during 2010 through 2013 were more evenly divided between Kodiak and non-Kodiak communities. Specifically, an average of 58% of GOA Pacific cod (areas 610, 620, and 630) delivered to Kodiak during 2010 through 2013. On an area basis, 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 dramatic shift in delivery patterns for area 620 Pacific cod during the A season. In the two years prior, 18% and 13% of the area 620 A season Pacific cod was delivered to non-Kodiak processors. In 2012 and 2013, 50% and 55% of area 620 A season Pacific cod was delivered to non-Kodak processors. 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 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 2013

Year	Community	A and B seaons for pollock catch (mt)			C and D seaons for pollock catch (mt)		
		Area 610	Area 620	Area 630	Area 610	Area 620	Area 630
2010	Kodiak	*	18,719	7,220	*	8,433	10,659
	Other	9,723	639	105	16,185	224	390
	Total	*	19,358	7,325	*	8,657	11,049
2011	Kodiak	*	26,174	6,123		8,337	12,332
	Other	8,381	1,177	111	12,090	424	421
	Total	*	27,351	6,234	12,090	8,761	12,753
2012	Kodiak		30,213	7,323	*	10,504	17,298
	Other	8,579	684	54	18,775	3,195	415
	Total	8,579	30,897	7,377	*	13,699	17,713
2013	Kodiak	*	32,337	8,452	*	14,572	18,087
	Other	5,873	3,578	234	1,714	2,116	1,370
	Total	*	35,915	8,686	*	16,687	19,456

Source: Catch Accounting

Table orginates from GOA_Tendering(04-30) excel file and raw data is from GOA_PCOD_PLCK(01-14)

* denotes confidential data

Blank cells no reported catch

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 2013

Year	Community	A seaon for Pacific cod catch (mt)			B seaon for Pacific cod catch (mt)		
		Area 610	Area 620	Area 630	Area 610	Area 620	Area 630
2010	Kodiak	*	3,261	15,092	2	1,151	8,147
	Other	10,306	736	1,726	5,118	52	168
	Total	*	3,996	16,818	5,120	1,203	8,316
2011	Kodiak	*	2,091	15,427	8	3,070	11,301
	Other	10,740	297	1,512	5,425	132	651
	Total	*	2,388	16,939	5,433	3,202	11,952
2012	Kodiak	*	2,921	16,547	5	2,203	7,164
	Other	10,145	2,919	2,279	4,474	229	497
	Total	*	5,840	18,826	4,479	2,432	7,661
2013	Kodiak	*	3,131	12,422	89	1,448	5,060
	Other	10,483	3,457	1,402	5,136	135	108
	Total	*	6,588	13,824	5,226	1,583	5,168

Source: Catch Accounting

Table orginates from GOA_Tendering(04-30) excel file and raw data is from GOA_PCOD_PLCK(01-14)

* denotes confidential data

Table 3 provides estimates of catcher vessel delivers of GOA pollock and Pacific cod to tender vessels from 2010 through 2013. 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 tenders[3], 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 28 mt of area 620 pollock was tendered. In 2012, the amount of area 620 pollock delivered to tenders increased to 2,238 mt, with most delivered in September. In 2013 approximately 4,040 mt of area 620 pollock was delivered to tender vessels, with most of the deliveries taking place during the month of March.

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 6,307 mt in 2012 to 10,607 mt during 2013. Area 620 Pacific cod ranged from 5,573 mt in 2010 to 8,157 mt during 2013. Deliveries of area 630 Pacific cod to tender vessels ranged from 2,811 mt in 2010 to 6,668 mt in 2012.

[3] 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 by reporting area delivered to tender vessels from 2010 through 2013

Year	GOA pollock catch (mt)			GOA Pacific cod catch (mt)		
	Area 610	Area 620	Area 630	Area 610	Area 620	Area 630
2010	*	3	*	*	5,573	2,811
2011	6,233	28	1	7,939	5,778	4,685
2012	13,013	2,238	*	8,074	6,083	6,668
2013	3,904	4,040	*	10,607	8,157	3,137
Source: Fish tickets received from ADF&G						
Table orginates from GOA_Tendering(04-30) excel file and raw file from GOA_Tendering(01-13)						
* denotes confidential data						

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[4]. Unfortunately, much of the information in Table 4 is masked to protect confidential data. In general, during the 2010 through 2013 period most of the tendered pollock is delivered to non-Kodiak processors, while deliveries of tendered area 620 Pacific cod is more evenly divided between Kodiak, Sand Point, King Cove, and Akutan shoreside processors. The table also includes tendered deliveries to floating processors.

[4] Deliveries to floating processors are also included as a community category.

Table 4 Annual metric tons of GOA area 620 pollock and Pacific cod catch delivered by tenders to processors by community from 2010 through 2013

Year	Community	Pollock		Pacific cod	
		Catch (mt)	Number of shore processors receiving tendered pollock	Catch (mt)	Number of shore processors receiving tendered Pacific cod
2010	Kodiak	*	3	2,583	5
	Sand Point		0	*	1
	Floating processors	*	1	*	1
	Total	*****	**4**	5,573	**7**
2011	Kodiak	*	3	3,153	5
	Sand Point		0	*	1
	King Cove	*	1	*	1
	Floating processors	*	1	*	1
	Total	**28**	**5**	**5,778**	**8**
2012	Kodiak	*	2	3,809	4
	Sand Point	*	1	*	1
	King Cove	*	1	*	1
	Floating processors		0	68	3
	Total	**2,238**	**4**	**6,083**	**9**
2013	Kodiak	*	3	3,626	5
	Sand Point	*	1	*	1
	King Cove	*	1	*	1
	Akutan	*	1	*	1
	Floating processors		0	*	2
	Total	**4,040**	**7**	**8,157**	**10**

Source: Fish tickets received from ADF&G

Table orginates from GOA_Tendering(04-30) excel file and raw file from GOA_Tendering(01-13)

* denotes confidential data

Blank cells no reported catch

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 nine in 2012, but during 2013, 19 tenders received area 620 pollock. The number of catcher vessels delivering area 620 pollock also increased during the 2013 fishing year from 20 vessels in 2012 to 40 vessels in 2013. Information in the table also reflects patterns noted in Table 3 with regards to 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 2013

Year	Area 610			Area 620			Area 630			GOA Wide		
	Tender	Processor	Catcher Vessel	Tender	Processor	Catcher Vessel	Tender	Processor	Catcher Vessel	Tender	Processor	Catcher Vessel
2010	8	3	36	5	4	14	2	2	9	11	7	57
2011	13	4	35	7	5	7	6	4	13	20	10	54
2012	18	5	35	9	4	20	5	3	16	23	8	56
2013	19	4	41	21	7	40	5	3	10	31	8	74

Source: Fish tickets received from ADF&G

Table orginates from GOA_Tendering(04-30) excel file and raw data from GOA_Tendering(01-13) and GOA_Tenders_CNT(01-21)

In Pacific cod fishery, the number of tenders in all three areas indicates their wide use throughout GOA. The number of tenders receiving area 610 Pacific cod has ranged from a low of eight in 2010 to a high of 23 in 2012. For area 620 Pacific cod, the number of tenders has ranged from a low of nine in 2010 to a high of 27 in 2013. Finally, the number of tenders receiving area 630 Pacific cod has ranged from eight 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 2013

Year	Area 610			Area 620			Area 630			GOA Wide		
	Tender	Processor	Catcher Vessel	Tender	Processor	Catcher Vessel	Tender	Processor	Catcher Vessel	Tender	Processor	Catcher Vessel
2010	8	3	42	9	7	29	8	6	34	18	10	97
2011	15	6	54	11	8	31	16	7	76	30	14	153
2012	23	7	65	24	9	81	18	8	132	40	14	212
2013	21	6	55	27	10	80	13	6	57	38	12	156
Source: Fish tickets received from ADF&G												
Table orginates from GOA_Tendering(04-30) excel file and raw data from GOA_Tendering(01-13) and GOA_Tenders_CNT(01-21)												

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 2013. 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. Also noticeable in Table 6 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. 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 2013 period, while very few tenders received area 630 pollock during this period.

Table 7 Monthly counts of tenders, processors, and catcher vessels prosecuting GOA pollock by reporting area from 2010 through 2013

Year	Month	Area 610			Area 620			Area 630		
		Tender	Processor	Catcher Vessel	Tender	Processor	Catcher Vessel	Tender	Processor	Catcher Vessel
2010	1	3	1	8	4	4	13	2	2	8
	2	6	2	27	2	2	3	1	1	2
	3	6	2	15						
	4	4	3	10						
	8	5	1	8						
	9	5	2	11	1	1	3			
	10	5	1	11						
2011	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			
	4							1	1	1
	8	6	2	6						
	9	8	2	18	1	2	1	2	2	3
	10	5	1	12						
2012	1	3	2	4	2	1	5	5	3	12
	2	6	2	11	4	3	7	3	2	9
	3	7	3	19						
	4	1	1	5						
	8	11	3	19						
	9	11	3	18	6	3	10			
	10	10	4	18	2	2	4			
2013	1	8	2	26	3	2	4	2	1	4
	2	8	2	18	5	4	15	3	2	5
	3	12	4	33	17	6	31	3	2	8
	4							1	1	1
	8				2	1	3			
	9	3	1	3	2	1	1			
	10	2	1	4						

Source: Fish tickets received from ADF&G

Table orginates from GOA_Tendering(04-30) excel file and raw data from GOA_Tendering(01-13)

Blank cells represent no tendering activity

Monthly tendering activity for the GOA Pacific cod fishery (Table 8) indicates wide use of tenders in all 3 areas. For deliveries of area 610 and area 630 Pacific cod to tender vessels, the information in Table 7 indicates consistent trends in tendering activity. However, tendering activity for area 620 Pacific cod has 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.

Table 8 Monthly counts of tenders, processors, and catcher vessels prosecuting GOA Pacific cod by reporting area from 2010 through 2013

Year	Month	Area 610			Area 620			Area 630		
		Tender	Processor	Catcher Vessel	Tender	Processor	Catcher Vessel	Tender	Processor	Catcher Vessel
2010	1	3	1	12	5	5	16	5	4	17
	2	7	3	33	3	3	5	5	4	13
	3	7	2	29	4	2	11			
	4	4	3	10	4	2	12			
	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			
2011	1	2	2	7	5	4	6	4	4	8
	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
	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							1	1	3
2012	1	5	3	9	5	4	7	9	5	43
	2	7	3	23	10	6	22	10	6	67
	3	11	5	38	11	7	21	7	4	41
	4	2	1	8	4	2	21	4	2	55
	5				2	2	6	3	2	22
	6							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
2013	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
	4				1	1	5	3	3	7
	8				2	1	3			
	9	3	1	3	2	1	1			
	10	2	1	4						

Source: Fish tickets received from ADF&G
Table orginates from GOA_Tendering(04-30) excel file and raw data from GOA_Tendering(01-13)
Blank cells represent no tendering activity

Table 9 shows the amount of GOA pollock by area that was delivered to tenders by length of the catcher vessels from 2010 through 2013. 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 1,907 mt of area 620 pollock to tenders, and the 60'-89' and 90'-124' vessel length groups delivered pollock to tenders, but is masked since it is confidential data. In 2013, it was the 90'-124' vessel size group that tendered the most area 620 pollock at 1,941 mt followed by the 60'-89' vessel size group at 1,914 mt and the 30'-59' vessel size group at 181 mt.

Table 9 Catcher vessel delivers of GOA pollock (mt) to tenders by vessel length and GOA area

Year	Vessel length (feet)	Area 610	Area 620	Area 630
2010	<30			
	30-59	*	2	*
	60-89	*	<1	*
	90-124			
2010 Total		*	3	*
2011	<30			
	30-59	*	*	*
	60-89		*	*
	90-124	*		*
2011 Total		6,233	28	1
2012	<30			
	30-59	10,724	1,907	*
	60-89	913	*	*
	90-124	1,364	*	
2012 Total		13,013	2,238	*
2013	<30			
	30-59	2,881	181	*
	60-89	*	1,914	*
	90-124	*	1,941	
2013 Total		3,904	4,040	*
Source: Fish tickets received from ADF&G				
Table orginates from GOA_Tendering(04-30) excel file and raw data from GOA_Tender_Length(01-16)				
* denotes confidential data				
Blank cells no reported catch				

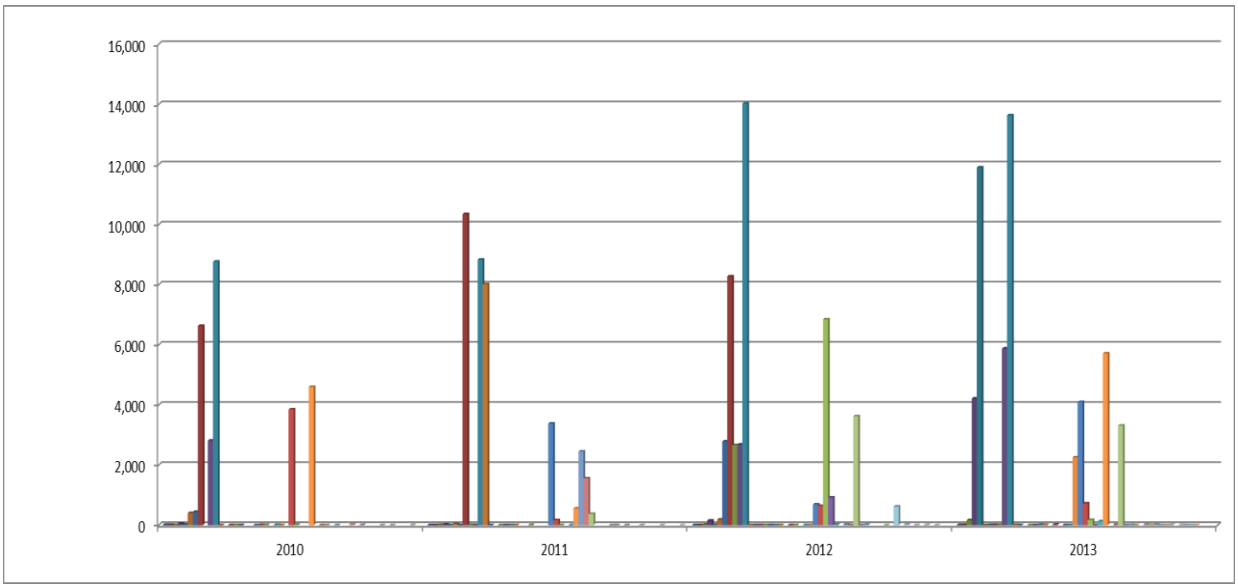
Table 10 provides the number of AFA vessels that are operating as tender vessels in the area 620 pollock fishery. As shown in the table, in 2010 there were no AFA vessels were operating as tenders in the area 620 pollock fishery, but in the subsequent years, the use of AFA vessels as tenders increased. In 2011, 2 AFA vessels operated as tenders with total tendered amount of 323 mt. The number of AFA vessels operating as tenders increased in 2011 to 8. During that year, those 8 AFA vessels tendered 3,769 mt of area 620 pollock. In 2013, the number of AFA vessels operating as tenders increase to 11 tendering 5,389 mt of area 620 pollock.

Table 10 **Annual count and catch (mt) of area 620 pollock delivered to AFA and non-AFA vessels operating as tender vessels from 2010 through 2013**

Year	AFA Vessels		Non-AFA vessels	
	Number	Catch (mt)	Number	Catch (mt)
2010	0	0	18	23,640
2011	2	323	28	24,341
2012	8	3,769	32	32,322
2013	11	5,389	27	24,459
Source: Fish tickets received from ADF&G				
Table orginates from afa_goa_tender(01-16)				

Figure 2 provides weekly catch of area 620 pollock from 2010 through 2013. As indicated in Figure 2, the pace of the area 620 pollock fishery is increasing. During the four 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. Another indication of the increasing pace of fishing for area 620 pollock is the increasing catch amounts during week 8, 11, and 12. Finally, nearly all of the tendering of area 620 pollock during the 2013 fishing year occurred in week 11.

Figure 2 **Weekly harvest of area 620 pollock from 2010 through 2013**



Management Implications with Respect to Catch Data

When catch is delivered to a tender vessel rather than delivered directly to the shore plant, the data is handled differently, and there are implications for inseason management, i.e., the ability of NMFS to accurately close the fishery once it reaches its target and incidental catch limits. Catch delivered to a tender vessel makes it more difficult both to project catch rates, to get information on deliveries in a timely way, and to precisely manage Chinook salmon prohibited species catch (PSC) limits.

First, NMFS uses shoreside processors' daily processing capacity (calculated based on historical data, and which vessels are currently delivering to each processor) to determine daily catch rates. The daily catch rates are then used to project on which day the fishery will achieve its target and/or incidental catch limits, and will need to be closed. When shoreside processors use tenders, then the calculation of

processing capacity for those processors is likely to be different, in a way not known to NMFS. The tenders may hold the delivery several days, or may deliver to a different processor. This unknown is mitigated by NMFS through direct communication with the processors, to ask how many tenders they are using, or how many vessels they have delivering both shoreside and to tenders. NMFS can also ask the shoreside processors to provide the tender vessel's hail weights (landing estimates) on a daily basis, when NMFS approaches a fishery closure.

Secondly, catch data entering the catch accounting system can be delayed as much as 5 to 7 days when catch is delivered to a tender vessel, compared to deliveries to shoreside processors. When a catcher vessel delivers to a tender, it must provide its Alaska Commercial Fisheries Entry Commission (CFEC) permit, which the tender vessel uses to issue a (paper) fish ticket to the catcher vessel. The fish ticket will include an estimation of the weight of delivered catch. The tender submits the fish ticket data to the shoreside processor on its return, and the processor must enter the fish ticket information into eLandings[5] within 7 days of the initial delivery.

Currently, NMFS mitigates the delay by asking shoreside processors for estimates of tender deliveries, especially when the catch is approaching limits that would necessitate a fishery closure. Another way to reduce the delay in catch information would be for shoreside processors to get the delivering vessel's CFEC permit from the tenders, and preliminarily enter the vessel's hail weights into eLandings, until the tender delivers the fish ticket data to the shoreside processor.

NMFS and the Alaska Department of Fish and Game (ADFG) are implementing a tender component to eLandings, called tLandings. Originally developed for salmon tender reporting, the system is being expanded to some groundfish tendering in 2013. Tender vessels are often stationed in areas where there is no internet connection, or communication ability, however this system enables electronic data entry on board tender vessels without an internet connection. The application and the landings reports (fish tickets) are stored on a portable thumb drive. Using the tLandings application, tender operators can create and print fish tickets similar to the current method used shoreside. When the tender makes a delivery to the shoreside processor, then landing data are uploaded into the eLandings system. Use of tLandings will still result in a delay of the information until the tender delivers to shore, but alleviates the time needed for the shoreside processor to manually enter the tender vessel's data once it arrives.

Finally, delivering GOA pollock catch to a tender vessel affects the precision of estimating salmon PSC intercepted in the directed pollock trawl fishery. When observed pollock vessels deliver shoreside, the offload is monitored by the observer, and the actual number of salmon is counted, and the data used for estimating fleet-wide Chinook salmon PSC limits. When a vessel delivers to a tender, it is not possible for the observer to monitor the offload. As a result, the estimate of salmon intercepted on the observed trip must be derived from at-sea sampling by the observer, which greatly reduces the precision of the estimate, due to the logistics of obtaining at sea samples on pollock vessels, and the fact that salmon is an uncommon species. The increased variance in the observed PSC estimate, which is then extrapolated fleet-wide, makes it more difficult for NMFS to manage the PSC limit inseason.

For the most part, NMFS mitigates the additional difficulties posed when a vessel delivers to a tender vessel through increased communication with the fleet. With respect to the variance associated with estimating Chinook salmon PSC on GOA pollock vessels, the Council's related action, to initiate a regulatory amendment for how observers are deployed with respect to tender vessels, should also improve the precision of Chinook salmon PSC limits for inseason managers. The Council's analysis proposes to allow observers to be deployed on tender vessels, in order to monitor offloads of pollock in the same way that offloads are monitored at the shore plant.

[5] eLandings is the Interagency Electronic Reporting System for reporting commercial fishery landings in Alaska.

The Council may also want to consider initiating a regulatory amendment to require that tender vessels use the tLandings system that has been developed to work with eLandings, and which was voluntarily deployed on some vessels in 2013. This is another way to improve the timeliness of data into the catch accounting system, and NMFS has indicated that the system is ready to be used throughout the fleet. Depending on what action, if any, the Council intends to take on other aspects of this discussion paper, the tLandings regulatory amendment could also be folded into the observer tender activity amendment.