

***Use of Bering Sea Sablefish Total Allowable Catch in IFQ/non-IFQ Fisheries  
North Pacific Fishery Management Council  
Discussion Paper  
March 2013***

**Summary**

**Why** In response to public testimony during the December 2012 Council meeting, the Council initiated this discussion paper to identify issues associated with separating the Bering Sea (BS) sablefish total allowable catch (TAC) into a fixed gear apportionment and a trawl gear apportionment when recommending annual harvest specifications. The Bering Sea/Aleutian Islands (BSAI) Groundfish Fishery Management Plan (FMP) sets the BS sablefish TAC apportionments to the fixed gear sector and trawl sector at 50 percent of the BS sablefish TAC to each gear type. The Council typically sets the sablefish TACs equal to the acceptable biological catch (ABC) in an effort to maximize the individual fishing quota (IFQ)/community development quota (CDQ) allocations to sablefish quota share holders. The sablefish TACs subsequently are apportioned to the IFQ/ CDQ fixed gear fisheries and the BS sablefish trawl fisheries under the authority of the FMP and Federal regulations. As a result the BS sablefish trawl TAC is set at the maximum level even though harvest is well below its allocation each year.

**What** The Council may wish to reallocate unused sablefish trawl allocation to:

- 1) The sablefish fixed gear sector to increase attainment of sablefish optimum yield (OY) by each IFQ holder; **and/or**
- 2) Any other BSAI groundfish TAC(s) to increase total groundfish yield under the 2 million mt OY.

**How** Staff has identified two potential management approaches to reallocate unused sablefish trawl allocations and increase yield under the OY.

- 1) Reapportion some of the non-specified reserve during the annual harvest specifications cycle (this would recover a small amount of foregone OY but could be accomplished in the next harvest specification cycle) ; **and/or**
- 2) Amend the BSAI Groundfish FMP to allow the Council to recapture some or all of the foregone OY (equal to the unharvested sablefish TAC) through greater flexibility in the annual harvest specification process.

Approach #1, which uses the non-specified reserve, could be adopted as part of the 2014/2015 harvest specification cycle to recapture some foregone OY if some of the non-specified reserve is reallocated to either sablefish fixed gear sector (some recaptured OY) and/or any or multiple TACs of other groundfish TAC categories (more recaptured OY). The Council would recommend each year to which TAC category it would reassign some of the non-specified reserve.

Approach #2 would require a BSAI Groundfish FMP amendment and regulatory amendment in order to authorize the Council to reapportion unused sablefish TAC which is apportioned to the trawl sector 1) directly to the sablefish fixed gear sector or (to result in some recaptured OY) and/or 2) any or multiple TACs of other groundfish TAC categories (to result in more recaptured OY). The Council would decide each year to which TAC category it would reassign some of the unused sablefish trawl apportionment. For the reapportionment to occur, a BS sablefish fixed gear TAC and BSAI sablefish trawl gear TAC would be required in order to reapportion (only) unused trawl TAC.

**When** The Council is scheduled to review this paper in April 2013, in order to determine if staff could identify a management solution that could be taken through the annual harvest specifications process in fall 2013 for the 2014 fishing season. Approach #1 could occur for the 2014 fishing year, while implementation of Approach #2 could occur for the 2015 fishing year, at the earliest.

**Purpose and Need for Action**

The purpose of the proposed action would be to increase the attainment of OY, in accordance with National Standard 1. The attainment of OY for BS sablefish only or all BSAI groundfish would be increased, depending on future Council action.

The sum of TACs for all groundfish stocks must remain within the OY range defined in the FMP. In the BSAI, the upper limit of the range is 2 million mt, which is constraining on commercial groundfish fisheries. As biomasses increase, commercial fishing sectors compete for increased allocation(s). More species and species groups have been separated for management of their own harvest specifications. This increased number of specification categories results in more of the 2 million mt OY limit being allocated to more TAC categories to prevent fisheries from being closed prematurely, due to incidental harvest. Some of those necessitate a buffer to prevent overages. In 2013 the Council is scheduled to consider whether to include grenadiers as a new TAC category in the future, which would further constrain the OY limit.

Table 1. Sablefish landings in 2012 by management area.

Sablefish Management Area	Vessel Landings	Total Catch Pounds	Allocation Pounds	Remaining Pounds	Percent Landed
AI	109	1,806,117	2,710,776	904,659	67
BS	159	1,060,884	1,966,503	905,619	54
CG	656	9,762,447	10,158,797	396,350	96
SE	608	6,878,168	6,995,196	117,028	98
WG	202	2,806,219	3,139,350	333,131	89
WY	236	4,237,514	4,356,290	118,776	97
<b>Total</b>	<b>1,970</b>	<b>26,551,349</b>	<b>29,326,912</b>	<b>2,775,563</b>	<b>91</b>

Table 1a. Sablefish allocation and weight posted by trawl and fixed gear in the BS.

Metric tons	Fixed Gear			Trawl Gear		
	Initial Quota	Catch Weight	Percent	Initial Quota	Catch Weight	Percent
2002	772	710	92%	821	300	37%
2003	1159	701	61%	1233	226	18%
2004	1450	745	51%	1341	293	22%
2005	1220	792	65%	1129	273	24%
2006	1410	952	68%	1305	84	6%
2007	1490	1081	73%	1378	92	7%
2008	1430	952	67%	1323	183	14%
2009	1360	798	59%	1258	93	7%
2010	1395	725	52%	1291	30	2%
2011	1425	651	46%	1318	44	3%
2012	1115	647	58%	1032	93	9%
<b>Total Period</b>	<b>14226</b>	<b>8754</b>	<b>62%</b>	<b>13429</b>	<b>1711</b>	<b>13%</b>
Notes: Includes CDQ and non-CDQ						
Source: NMFS Alaska Region Catch Accounting System, data compiled by AKFIN						

**Table 2a. Fixed Gear Sablefish allocation and weight posted by CDQ and non-CDQ in the BS.**

Metric tons	CDQ			Non-CDQ		
	Year	Initial Quota	Catch Weight	Percent	Initial Quota	Catch Weight
2004	290	141	49%	1160	604	52%
2005	244	227	93%	976	565	58%
2006	282	179	63%	1128	774	69%
2007	298	260	87%	1192	821	69%
2008	286	240	84%	1144	713	62%
2009	272	122	45%	1088	676	62%
2010	279	213	76%	1116	512	46%
2011	285	162	57%	1140	489	43%
2012	223	160	72%	892	487	55%
<b>Total Period</b>	<b>2459</b>	<b>1702</b>	<b>69%</b>	<b>9836</b>	<b>5641</b>	<b>57%</b>

Notes: \*Confidential

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

**Table 2b. Trawl Gear Sablefish allocation and weight posted by CDQ and non-CDQ in the BS.**

Metric tons	CDQ			Non-CDQ		
	Year	Initial Quota	Catch Weight	Percent	Initial Quota	Catch Weight
2004	109	21	19%	1232	272	22%
2005	92	1	1%	1037	272	26%
2006	106	32	31%	1199	52	4%
2007	112	25	22%	1266	67	5%
2008	107	23	22%	1216	160	13%
2009	*	*	*	*	*	*
2010	105	1	1%	1186	29	2%
2011	107	3	3%	1211	41	3%
2012	84	7	8%	948	86	9%
<b>Total Period</b>	<b>822</b>	<b>114</b>	<b>14%</b>	<b>9295</b>	<b>978</b>	<b>11%</b>

Notes: \*Confidential

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

Table 3a. Fixed Gear Sablefish allocation and weight posted by Vessel Category in the BS.

Metric Tons	A			B			C		
	Year	Initial Quota	Catch Weight	Percent	Initial Quota	Catch Weight	Percent	Initial Quota	Catch Weight
2004	462	209	45.29%	479	253	52.73%	219	61	27.83%
2005	388	259	66.84%	404	235	58.04%	184	63	34.07%
2006	448	349	77.93%	467	301	64.54%	213	77	36.41%
2007	474	406	85.58%	494	315	63.73%	224	82	36.48%
2008	455	325	71.35%	474	281	59.35%	215	77	35.58%
2009	433	312	72.11%	450	275	61.14%	205	87	42.62%
2010	455	177	38.99%	462	242	52.40%	198	71	35.81%
2011	454	204	44.98%	471	205	43.58%	215	69	31.89%
2012	355	189	53.16%	369	219	59.33%	168	73	43.47%
Total Period	3,924	2,430	61.94%	4,070	2,326	57.15%	1,840	659	35.81%

Notes: Catch Weight in Product Amounts

Source: NMFS Alaska Region IFQ, data compiled by AKFIN

**Current procedures for setting sablefish TAC apportionments in the BSAI**

- The BSAI Groundfish FMP and 50 CFR 679.20(a)(4)(iii) and (iv) require that sablefish TACs for the BS and AI subareas be allocated between trawl gear and fixed gear (hook-and-line or pot) sectors. Of the TAC for the BS subarea, 50 percent is allocated to vessels using trawl gear, and 50 percent to fixed gear vessels. The TAC for the AI subarea is divided 25 percent to the trawl gear vessels, and 75 percent to fixed gear vessels.
- For all other groundfish TAC categories the CDQ allocations come “off the top” of the TAC before any further gear or sector apportionments. For sablefish the CDQ allocations occur after the gear split. Section 679.20(b)(1)(ii)(B) requires NMFS to allocate 20 percent of the fixed gear allocation of sablefish to the CDQ reserve. Section 679.20(b)(1)(ii)(D) requires that 7.5 percent of the trawl gear allocation of sablefish from the non-specified reserves, established under § 679.20(b)(1)(i), be assigned to the CDQ reserve.
- Section 679.20(b)(1)(i) requires that fifteen percent of the BSAI TAC for each target species, except pollock, the hook-and-line and pot gear allocation for sablefish, and the Amendment 80 species, which includes Pacific cod, is automatically placed in the non-specified reserve before allocation to any sector. The remaining 85 percent of each TAC is apportioned to the initial TAC for each target species that contributed to the non-specified reserve. The non-specified reserve is not designated by species or species group. Any amount of the non-specified reserve may be apportioned to target species that contributed to the non-specified reserve, provided that such apportionments are consistent with paragraph (a)(3) of this section and do not result in overfishing of a target species.

As soon as practicable after April 1, June 1, and August 1, and on such other dates as NMFS determines appropriate, NMFS will, by notification in the *Federal Register*, apportion all or part of the BSAI reserve. Part or all of the BSAI reserve may be withheld if an apportionment would adversely affect the conservation of groundfish resources or prohibited species. NMFS will provide all interested persons an opportunity to comment on the proposed apportionments before such apportionments are made, unless NMFS finds that there is good cause for not providing a prior comment opportunity, and

publishes the reasons therefore in the notification of apportionment. Comments must be received by NMFS not later than 5 days before April 1, June 1, and August 1, or other dates that may be specified.

If NMFS determines for good cause that notification of apportionment must be issued without providing interested persons a prior opportunity for public comment, comments on the apportionment will be received for a period of 15 days after its effective date. NMFS will consider all timely comments in deciding whether to make a proposed apportionment or to modify an apportionment that previously has been made, and shall publish responses to those comments in the Federal Register as soon as practicable.

BSAI trawl halibut prohibited species catch (PSC) limits are allocated to the BSAI trawl limited access sector and the Amendment 80 sector. The BSAI trawl limited access sector does not apportion a halibut PSC limit to the trawl Greenland turbot/arrowtooth/sablefish fishery category. Therefore, directed fishing for sablefish is prohibited for this sector. Since 2008 the PSC cooperative quota (CQ) assigned to Amendment 80 cooperatives is not allocated to specific fishery categories. Therefore, directed fishing for sablefish is open for this sector. However, sablefish has high halibut PSC rates and low catch rates; therefore, the Amendment 80 sector has not pursued directed fisheries for sablefish.

#### **Two potential management approaches for Council consideration**

*1. Non-specified reserves.* One approach to separate sablefish trawl and fixed gear TAC apportionments would be to reapportion the 7.5% of the trawl TAC that is placed in the non-specified reserve. The reallocation of the non-specified reserve to fixed gear would occur in the harvest specifications and would not require additional rulemaking<sup>1</sup>. In December, the Council would need to recommend to NMFS that the amount of the non-specified reserves from the sablefish trawl apportionment of the ITAC be reallocated either to the sablefish fixed gear TAC (then the CDQ groups would get 20% of the reallocation) or to the sablefish fixed gear ITAC (then the reallocation would not include CDQ groups). NMFS would do this in the final harvest specifications (usually Table 2) and would not be effective until they were published in the Federal Register and effective.

Since 1995, the non-specified reserves have not been used to increase the trawl allocation of sablefish. From 1995 to 2008, trawl sablefish was closed to directed fishing because no PSC limit was allocated to the trawl Greenland turbot/arrowtooth/sablefish fishery category.

Section 679.20(b)(1) is species specific, does not address gear types, and does not prohibit the allocation of non-specified reserves to the sablefish fixed gear sector, even though this sector does not contribute to the non-specified reserve. This discrepancy might not have been the intended result when the regulations were drafted. And while the regulations may not prohibit such an allocation, it would have

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<sup>1</sup> An example from 76 FR 71269: "The 2011 initial total allowable catch (ITAC) of Greenland turbot in the Bering Sea subarea was established as 2,975 metric tons (mt) by the final 2011 and 2012 harvest specifications for groundfish of the BSAI (76 FR 11139, March 1, 2011). In accordance with § 679.20(a)(3) the Regional Administrator, Alaska Region, NMFS, has reviewed the most current available data and finds that the ITAC for Greenland turbot in the Bering Sea subarea needs to be supplemented from the non-specified reserve in order to promote efficiency in the utilization of fishery resources in the BSAI and allow fishing operations to continue. Therefore, in accordance with § 679.20(b)(3), NMFS apportions from the non-specified reserve of groundfish 150 mt to the Greenland turbot ITAC in the Bering Sea subarea. This apportionment is consistent with § 679.20(b)(1)(i) and does not result in overfishing of a target species because the revised ITAC is equal to or less than the specifications of the acceptable biological catch in the final 2011 and 2012 harvest specifications for groundfish in the BSAI (76 FR 11139, March 1, 2011). The harvest specification for the 2011 Greenland turbot ITAC included in the harvest specifications for groundfish in the BSAI is revised as follows: 3,125 mt for Greenland turbot in the Bering Sea subarea."

to comply with applicable IFQ and CDQ sablefish regulations relating to allocations/apportionments. RAM Division previously has noted that any reapportionment to IFQ holders should be accomplished prior to issuance of annual IFQ permits. Mid-year implementation of the proposed action would require the reissuance of thousands of IFQ permits, increasing the costs of administrating the IFQ Program and potentially cause considerable confusion.

The following table indicates that the BS and AI trawl sablefish non-specified reserve amounts are fairly small (2012: BS = 84 mt and 2013: BS = 59 mt). Even if 7.5% of the trawl sablefish TAC placed in the non-specified reserve was reallocated to the sablefish fixed gear sector, it would only recapture about ten percent of the unused trawl sablefish apportionment. But the Council may choose this approach as an interim solution while it pursued a more comprehensive, long term approach.<sup>2</sup>

BSAI Sablefish Allocations											
2012											
Area	Gear	Percent	TAC	ITAC	CDQ Reserve	Non Specified Reserve	Remaining ITAC	Percent Remaining ITAC	Remaining CDQ	Percent Remaining CDQ	
Bering Sea	Trawl	50%	1,115	948	84	84	862	91%	77	92%	
	Hook-and-line/pot	50%	1,115	892	223	-	405	45%	63	28%	
<b>Total</b>		<b>100%</b>	<b>2,230</b>	<b>1,840</b>	<b>307</b>	<b>84</b>	<b>1,267</b>	<b>69%</b>	<b>140</b>	<b>46%</b>	
Aleutian Is.	Trawl	25%	513	436	38	38	292	67%	34	89%	
	Hook-and-line/pot	75%	1,537	1,230	307	-	397	32%	86	28%	
<b>Total</b>		<b>100%</b>	<b>2,050</b>	<b>1,666</b>	<b>345</b>	<b>38</b>	<b>689</b>	<b>41%</b>	<b>120</b>	<b>35%</b>	
2013											
Area	Gear	Percent	TAC	ITAC	CDQ Reserve	Non Specified Reserve					
Bering Sea	Trawl	50%	790	672	59	59					
	Hook-and-line/pot	50%	790	632	158	-					
<b>Total</b>		<b>100%</b>	<b>1,580</b>	<b>1,304</b>	<b>217</b>	<b>59</b>					
Aleutian Is.	Trawl	25%	535	455	40	40					
	Hook-and-line/pot	75%	1,605	1,284	321	-					
<b>Total</b>		<b>100%</b>	<b>2,140</b>	<b>1,739</b>	<b>361</b>	<b>40</b>					
ITAC = TAC minus Reserve (15% for trawl, 20% for hook-and-line/pot)											
CDQ Reserve = 7.5% for trawl, 20% for hook-and-line/pot											
Non Specified Reserve = 7.5% for trawl, 0% for hook-and-line/pot											

## 2. FMP Amendment.

Prior to the implementation of the sablefish IFQ Program, Amendment 15 to the BSAI Groundfish FMP allocated the sablefish quota by gear type, 50% to fixed gear and 50% to trawl gear in the eastern BS, and 75% to fixed gear and 25% to trawl gear in the Aleutian Islands, effective 1990. Without permanently changing the gear allocations, the Council could adopt an amendment to the FMP to modify the text to allow the Council to set the fixed gear sablefish at a minimum of 50% and trawl gear at a maximum of 50% in the eastern BS. The intent here is not to reopen what may be a controversial reallocation of sector TAC splits, but allow the Council to annually reapportion projected unused sablefish trawl TAC until such time that the sablefish TAC is fully utilized.

<sup>2</sup> Note also that there is no sablefish "reserve" for the Gulf of Alaska. The amounts remaining for trawl sablefish in the GOA is low compared with the BS and AI because the GOA trawl fleet has higher catch rates, but is still high as a percentage of the Western area sablefish TAC.

### 2012 GOA sablefish trawl sector

Western: TAC = 324 mt; Catch = 54 mt; Remaining = 270 mt or 83%  
 Central: TAC = 948 mt; Catch = 918 mt; Remaining = 30 or 3%  
 West Yakutat: TAC = 247 mt; Catch = 109 mt; Remaining = 138 mt or 56%  
 Southeast: no trawl allocation

Possible FMP amendment text follows; similar revisions could be made to the text pertaining to the AI or the GOA (although the benefit of a similar action in the eastern GOA is small due to the prohibition on the use of trawl gear and the markedly higher sablefish landings as a percent of TAC (see Table 1)). An Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis would be required. Proposed and final rulemaking would be required. After implementation the reapportionment would occur under annual harvest specifications rulemaking.

If the Council does not identify this potential action as controversial, this action could be scheduled for initial review/final action at the same meeting in order to streamline the implementation timeline, but given the timing of consideration of this discussion paper and the need to develop the required analyses it is unlikely to be in effect for the 2014/2015 harvest specification cycle.

Possible FMP Text for revising Bering Sea (only) TAC setting:

BSAI: Separate Bering Sea sablefish TACs would be set for fixed gear and trawl gear. Vessels using fixed gear may be allocated harvest no more than 50% or more of the TAC-ABC in the Bering Sea and 75% of the TAC in the Aleutian Islands; vessels using trawl gear may be allocated harvest no more than 50% of the TAC-ABC in the Bering Sea and 25% of the TAC-ABC in the Aleutian Islands.

**Two management results of proposed action**

Both management approaches described above would result in increased flexibility for the Council to attain BSAI groundfish OY. No preference as to which species categories could benefit from increased TACs needs to be preordained by the Council to proceed with either or both management approaches. During each annual harvest specification cycle the Council could have the flexibility to reallocate BS sablefish trawl apportionment as it best determines from the information it has at the time of its decision. So while Council would have the prerogative at any time of adopting a policy of how it wishes to reapportion the TACs, it would not be required to do so. The Council may identify a specific species or species group in which to reallocate unused BS trawl sablefish as a strawman or to elicit public comment or it may leave itself maximum flexibility by not doing so.

BS sablefish: Reapportioning unused trawl sector sablefish TAC to the sablefish fixed gear sector in the BS likely would recapture a small percentage of OY from unused trawl sablefish apportionments. The limit on increased achievement of sablefish OY occurs as only a small percent of IFQ holders are currently taking their entire individual allocations. Only 3 IFQ holders are at or over the sablefish use cap from direct QS holdings (3,229,721 QS units); two hold category A QS and one holds category B QS. See Figure 1 for a distribution of harvest rates per BS sablefish IFQ holder.

CDQ holders, who are allocated 20% of the 50% BS fixed gear sablefish apportionment, also do not all attain their entire allocations (*see above tables*). Note that any reassignment of sablefish TAC to sablefish IFQ and CDQ holders must occur *prior* to the issuance of IFQ permits by the NMFS Restricted Access Management Division in order to not introduce inefficiencies and costs to management of the IFQ/CDQ programs.

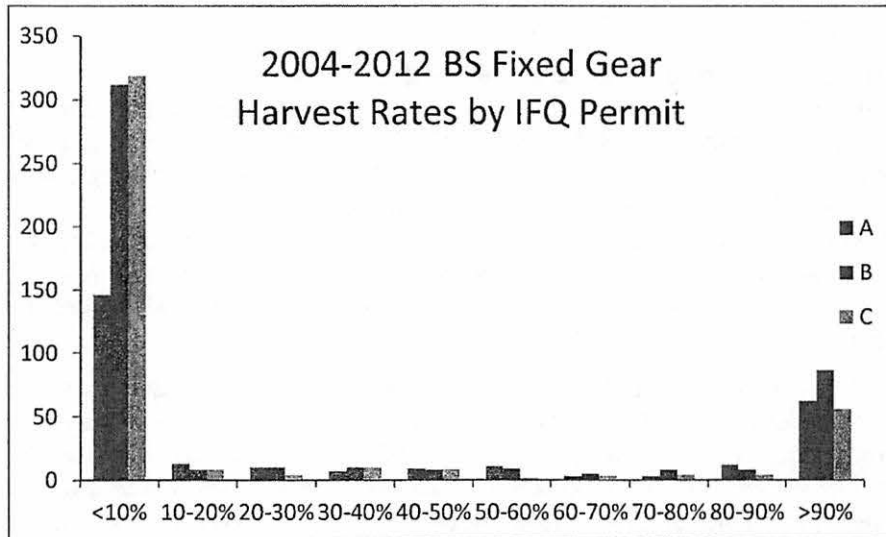
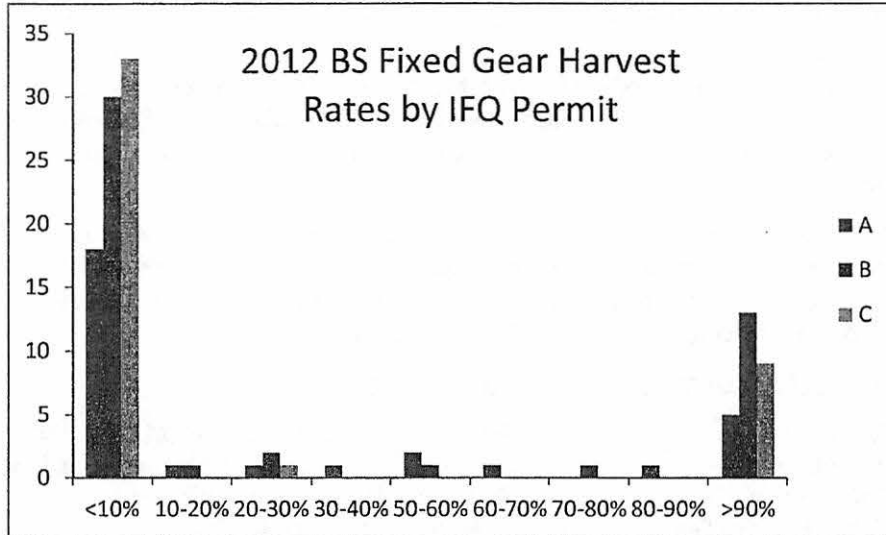


Figure 1 Harvest rates for individual Bering Sea sablefish IFQ permit holders. Source: AKFIN.

**BSAI groundfish:** Reapportioning unused sablefish trawl TAC to all groundfish sectors in the BS likely would recapture a larger percentage of OY from unused sablefish trawl apportionments. During the annual harvest specification process the Council would decide how to redistribute the recaptured sablefish OY among the various species TACs and gear apportionments, based on its own objectives, as well as recommendations from the Advisory Panel, industry, and general public. Note that constraints on other fisheries have been increased when stock biomasses are high and the Council reduces inefficiencies for harvesting TAC. The Council has several initiatives that affect BSAI groundfish OY on its 2013 agendas, including adding grenadiers to the FMP and “flatfish specification flexibility<sup>3</sup>.”

<sup>3</sup> This action would allocate the ABC reserve for three flatfish species among Amendment 80 cooperatives and CDQ groups, using the same formulas that are used in the annual harvest specifications process. These entities would exchange their flatfish quota share for an equivalent amount of their allocation of the ABC reserve for these species.



**Next Steps**

If it wishes to take further action to address National Standard 1, the Council should:

- identify which or both approaches to pursue
  - interim solution under authority of the harvest specification process
  - long term solution through FMP and/or regulatory amendments

For reapportioning the non-specified reserve:

- request NMFS staff to assist the Council during its consideration of proposed and final harvest specifications in October 2013 and December 2013

For FMP and/or regulatory amendments:

- identify the purpose and need for action
- identify the action area
  - Bering Sea
  - Aleutian Islands
  - Gulf of Alaska
- range of alternatives
- timeline for action

**Conclusions**

In response to a Council request, Council staff and NMFS staff have identified two potentially complementary approaches to increase the attainment of OY in the Bering Sea. The Council will consider both approaches and decide on a course of action at its April 2013 meeting.

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**APPENDIX 1. Additional information on sablefish management in the Aleutian Islands.**

**Table 1b. Sablefish allocation and weight posted by trawl and fixed gear in the AI.**

Metric tons	Fixed Gear			Trawl Gear			
	Year	Initial Quota	Catch Weight	Percent	Initial Quota	Catch Weight	Percent
	2002	1530	933	61%	541	57	11%
	2003	1860	974	52%	659	35	5%
	2004	2325	924	40%	717	32	4%
	2005	1965	1366	70%	606	115	19%
	2006	2250	1071	48%	694	60	9%
	2007	2108	1108	53%	649	40	6%
	2008	1830	824	45%	565	76	13%
	2009	1650	1021	62%	509	75	15%
	2010	1552	1002	65%	479	74	16%
	2011	1425	972	68%	440	47	11%
	2012	1537	1054	69%	474	148	31%
	<b>Total Period</b>	<b>20032</b>	<b>11249</b>	<b>56%</b>	<b>6333</b>	<b>759</b>	<b>12%</b>
Notes: Includes CDQ and non-CDQ							
Source: NMFS Alaska Region Catch Accounting System, data compiled by AKFIN							

**Table 2c. Fixed Gear Sablefish allocation and weight posted by CDQ and non-CDQ in the AI.**

Metric tons	CDQ			Non-CDQ			
	Year	Initial Quota	Catch Weight	Percent	Initial Quota	Catch Weight	Percent
	2004	*	*	*	*	*	*
	2005	393	319	81%	1572	1048	67%
	2006	*	*	*	*	*	*
	2007	422	336	80%	1686	773	46%
	2008	366	131	36%	1464	693	47%
	2009	330	235	71%	1320	785	59%
	2010	310	283	91%	1242	719	58%
	2011	285	198	69%	1140	774	68%
	2012	307	221	72%	1230	833	68%
	<b>Total Period</b>	<b>2413</b>	<b>1723</b>	<b>71%</b>	<b>9654</b>	<b>5624</b>	<b>58%</b>
Notes: *Confidential							
Source: NMFS Alaska Region Catch Accounting System, data compiled by AKFIN							

Table 2d. Trawl Gear Sablefish allocation and weight posted by CDQ and non-CDQ in the AI.

Metric tons	CDQ			Non-CDQ		
Year	Initial Quota	Catch Weight	Percent	Initial Quota	Catch Weight	Percent
2004	*	*	*	*	*	*
2005	*	*	*	*	*	*
2006	*	*	*	*	*	*
2007	52	5	10%	597	35	6%
2008	*	*	*	*	*	*
2009	*	*	*	*	*	*
2010	*	*	*	*	*	*
2011	36	3	8%	404	44	11%
2012	38	4	11%	436	144	33%
Total Period	126	12	10%	1437	224	16%

Notes: \*Confidential

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

Table 3b. Fixed Gear Sablefish allocation and weight posted by Vessel Category in the AI.

Metric Tons	A			B			C		
Year	Initial Quota	Catch Weight	Percent	Initial Quota	Catch Weight	Percent	Initial Quota	Catch Weight	Percent
2004	*	*	56.13%	*	*	45.16%	*	*	38.37%
2005	884	542	61.32%	557	343	61.52%	131	61	46.65%
2006	*	*	40.89%	*	*	31.66%	*	*	55.11%
2007	948	414	43.72%	598	273	45.70%	140	42	29.94%
2008	823	409	49.64%	519	191	36.77%	122	44	35.82%
2009	742	443	59.75%	468	275	58.77%	110	34	30.55%
2010	705	431	61.15%	442	181	40.98%	95	29	30.80%
2011	698	521	74.55%	440	222	50.47%	103	21	20.39%
2012	691	510	73.74%	436	276	63.42%	102	33	32.05%
Total Period	5,491	3,270	59.54%	3,460	1,761	50.91%	804	264	32.78%

Notes: \*Confidential, Catch Weight in Product Amounts

Source: NMFS Alaska Region IFQ, data compiled by AKFIN

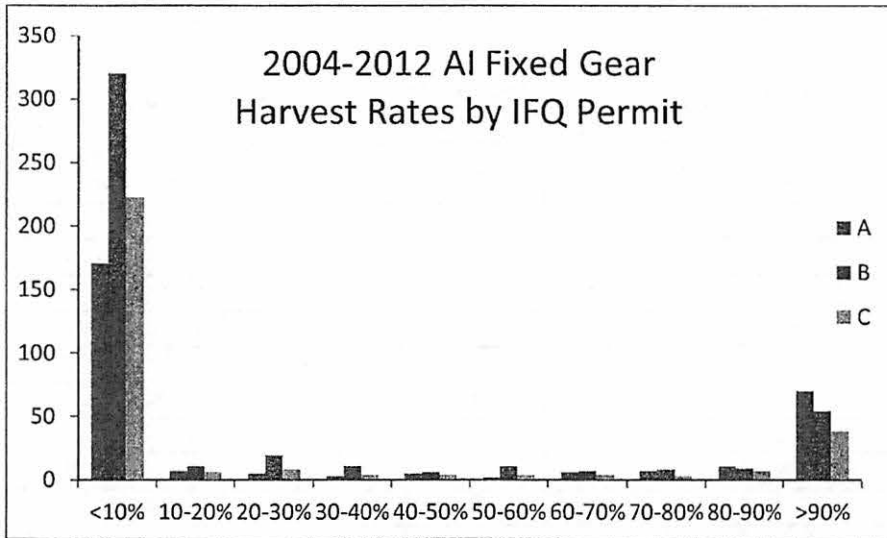
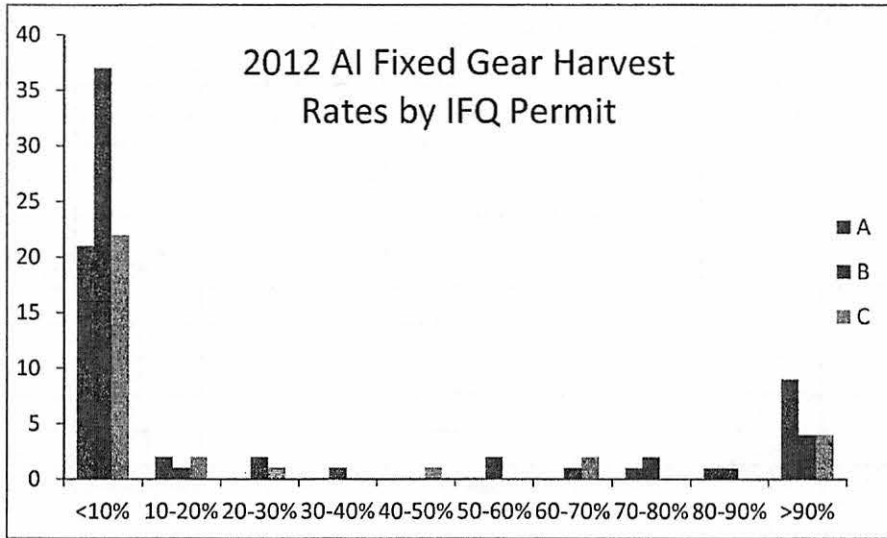


Figure 2 Harvest rates for individual Aleutian Islands sablefish IFQ permit holders. Source: AKFIN.