



## D2 Small Sablefish Discarding

December 2019 Council Meeting

### Action Memo

Council Staff: Jim Armstrong  
Other Presenters: Dr. Joseph Krieger, NMFS (AKRO)  
Action Required: 1. Review discussion paper  
2. Determine what further action is necessary.

### BACKGROUND

This is the third in a series of discussion papers<sup>1,2</sup> that explore a regulatory allowance for discarding small sablefish in the Individual Fishing Quota (IFQ) sablefish fishery, for which any discarding is currently prohibited. An October 2018 discussion paper described sablefish abundance and growth, whether discarding could adversely affect the resource, information needed for discard mortality rates (DMR), changes to observer sampling protocols, and the value-per-pound of sablefish by year and across FMP subareas. The April 2019 discussion paper addressed estimation and accounting for discard mortalities, proxy DMRs, intermittent discarding, whale depredation, gear modifications, effects on spawning stock, high-grading, and enforcement.

The current [discussion paper](#) addresses six itemized concerns identified by the Council including 1) voluntary vs. mandatory discarding, 2) single vs. area-specific size limits, 3) discard accounting within acceptable biological catch (ABC) and total allowable catch (TAC), 4) proxy DMRs, 5) gear-specific DMRs, and 6) monitoring and enforcement issues related to how discards are estimated. Additionally, the potential effects of discarding on stock abundance is addressed. Select conclusions associated with Council's itemized concerns are provided here:

1. Voluntary discarding maximizes flexibility and is almost universally appealing to fishing operations where encounters with small, marginally valuable fish are not predictable. Financially punitive conditions may be more frequent for size-based mandatory discards than under no discarding. Voluntary discarding adds to the uncertainty in discard estimates. Significant observer monitoring would be necessary to ensure accuracy in discard inputs for the sablefish stock assessment.
2. Because of high movement rates by sablefish, there are no known differences in demographics of sablefish in different areas. Because of the Alaska-wide similarities in sablefish demographics, area-specific size limits may not be necessary, or appropriate, to achieve the Council's objectives.
3. No set-aside was ever established for sablefish discards in the IFQ fishery when the IFQ Program was established. An allowance for IFQ discards will necessitate reductions in TAC allocations to either trawl and IFQ vessels or IFQ vessels only. Complete use of the trawl TAC recently suggests that overall TAC reductions would affect trawl vessels. For IFQ vessels, the discard

<sup>1</sup>October 2018 discussion paper available at: <https://meetings.npfmc.org/Meeting/Details/142>

<sup>2</sup>April 2019 discussion paper available at: <https://meetings.npfmc.org/Meeting/Details/583>

reduction would have to change proportional to IFQ. Landings reporting and discard estimation do not occur at the same time, so precaution would be needed to avoid exceeding IFQ using discards.

4. The selection of any of the proxy DMRs presented in this discussion paper would yield similar sablefish “savings”. This being the case, the Council may wish to choose the initial DMR which it feels has the best scientific justification.
5. Proportionally, sablefish savings from the pot fishery far exceed those from the hook-and-line fishery. The Council may choose to consider how this could influence participation in the pot fishery, as this relatively large increase in savings could provide an incentive for increased participation in the IFQ pot fishery.
6. Survey based discard estimates present challenges related to introduction of uncertainty, timeliness, consistency across years, and calibration to pot selectivity. Observer based estimates introduce potential bias from an observer effect, accuracy issues for EM-based estimates, and significant increases in investment and changes to onboard protocols. Logbook reporting is not a timely source for in-season management against ABC/TAC. Aside from issues related to size limits, an inherent enforcement problem for observer or survey estimates has to do with liability - the IFQ is assigned to an individual, but the discard estimate would come from a third party and would be applied fleet-wide.

Population effects of discarding on the current Alaska stock of sablefish was explored through a set of hypothetical forecasts. In the forecasts, future ABC declines very rapidly initially, especially for a larger size limit. SSB declines as well, and fishing mortality on older fish is greater than under current conditions. The forecasts allowed ABC to be caught each year and did not include discards in achieving that. As such, the impacts on the population under well accounted for discards would be less than in the forecasts. However, discarding small sablefish would necessarily increase fishing pressure on larger older fish.

Conclusory remarks are also provided toward the end of the discussion paper that suggest further exploration of operational solutions such as a tagging program to improve DMR estimations, or through an exempted fishing permit to develop better procedures for accounting for discarded sablefish. Any such project would need to occur for both hook-and-line and pot gear, and potentially in multiple areas and across vessel classes. Viable discarding methods would be restricted to vessels that are able to support adequate vessel-level monitoring criteria both operationally and financially.