

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: ~~DL HALIBUT ABM~~ DL HALIBUT ABM

		Check the boxes below if you will have a PowerPoint or Handout		
	NAME (Please Print)	TESTIFYING ON BEHALF OF:	Handout	PPT
1	CHRIS WOODLEY / MARK FINA	GROUNDFISH FORUM / AIC SEAFARM COASTAL		X
2	Robert Ahrens	FVOA - /scotthe	X	
3	Jeff Kruckmann	self		X
4	Helen McLarty	USSEA		
5	Mateo Paj-Soldan / Green Southport - City of St. Paul			
6	ARNE FUGLVOG	NSFC		
7	GERRY MERRIGAN	FLC		X
8	John Gauvin	AKSC		
9	Linda Behken			
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				

NOTE to persons providing oral or written testimony to the Council: Section 307(1)(l) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.

Possible ABM Actions

- 1) *Performance Standard* – A performance standard could create incentives for reduction of bycatch to the extent practicable regardless of whether the specific cap is binding – No index has been identified that correlates well to encounter rates – a performance standard could accommodate unpredicted variability, rewarding good performance; and, penalizing poor performances. This element is intended to reduce PSC usage to the extent practicable.
- 2) *Share in declines/provide extra halibut to Alaska communities* - this provision would adjust the PSC limit downward in years of low 4CDE catch limits – an estimate of the additional halibut that would come available because of the cap reduction would be prioritized for CDQ groups that receive 4CDE allocations. Although the performance standard reduces PSC to the extent practicable, the adjustment here is intended to supplement that measure to address two issues – sharing the burden of a stock decline in Area 4CDE and supplementing the halibut available to local communities that have few alternative opportunities because of the remote location. These community impacts are distinguishable from those of traditional IFQ holders. Although the community may be aware of the fluctuations in fishery stocks, a community cannot move or diversify to different areas as a traditional IFQ holder can and does; therefore, prioritizing a community allocation is appropriate to ensure the community fishery remains functional in low abundance periods.

Rationale

In recent years, participants in Bering Sea and Aleutian Island groundfish fisheries reduced halibut bycatch and its mortality from historical levels. The current fixed halibut PSC caps may not accurately reflect the practicable extent to which halibut bycatch mortality may be reduced in those groundfish fisheries. In addition, fixed limits do not consider circumstances in the directed halibut fisheries and the effects of bycatch on directed fishery opportunities, particularly in remote Alaska communities at times of low halibut fishery catch limits. This action considers potential changes to groundfish halibut PSC limits to reflect the extent to which reductions in halibut bycatch mortality in groundfish fisheries are practicable. In addition, the action considers varying halibut PSC limits and annual quota distribution to provide for improved directed fishery opportunities in remote BSAI communities that have fewer opportunities at times of low harvest limits in Area 4CDE.

Element 1 – *This element is intended to adjust PSC limits to correspond to the trawl sector's ability to reduce halibut PSC to the extent practicable. This element reflects the absence of an index that corresponds well to the trawl sector's ability to reduce halibut mortality and the unpredictable variability in halibut interactions. In the absence of such an index and predictability, setting a performance standard that must be achieved for a subset of years (i.e., 3 of 5 years) results in halibut bycatch minimization. The performance standard will create an incentive for halibut avoidance in years when a higher cap might not be binding, while allowing additional halibut mortality in years when the performance might be unachievable. All direct fishery participants will benefit from reduced halibut PSC usage under this element.*

If the 4CDE directed fishery catch limit exceeds 2 million pounds in a year, that year would be considered to meet the performance standard regardless of the amount of PSC used. The high amount of halibut in that year suggests that the performance standard may be unattainable and unnecessary.

Element 1 - Performance standard

The annual PSC limit for all sectors shall be 3,515 mt (the A80 share is 1,745 mt).

If a sector has maintained its PSC usage to less than 90% of its limit (i.e., 1,571 mt for A80) in 3 of the preceding 5 years, that sector will be permitted to use up to its full limit (i.e., 1,745 mt for A80) in the coming year. If the sector does not meet this performance standard, it shall be limited to 90% of its limit (i.e., 1,571 mt) in the coming year.

Years in which the Area 4CDE directed halibut fishery limit is at least 2 million net pounds the 90% performance standard threshold will not applied.

Example – Amendment 80 performance is shown in the following table. Each year’s PSC limit is determined after applying the performance standard. That standard is applied by determining whether the sector maintained PSC below its performance standard in 3 of the preceding 5 years. If a sector successfully remained below its performance standard in 3 years, its cap would remain at its normal level (1,745 mt for A80). If the sector exceeded the performance standard in 3 or more of the preceding 5 years, its cap for the coming year would be reduced to 90 percent of its normal cap (1,571 mt for A80). In the example below, setting the limit for 2017, the sector exceeded the 1,571 mt performance standard in 2015, 2014, 2013 and 2012 (i.e., 4 of the previous 5 years). Consequently, its 2017 cap would be reduced to 1,571 mt. Setting the 2019 cap, the sector exceeded the 1,571 mt performance standard in 2014 and 2015 (i.e., 2 of the preceding 5 years). As a result, the 2019 PSC limit would remain at the normal cap (1,745 mt).

Year	Halibut mortality (mt)	PSC exceeded Annual Performance Standard (1,571 mt)	PSC exceeded 3 of 5 preceding years	Annual limit after applying performance standard
2011	1,811	Y	NA	
2012	1,945	Y	NA	
2013	2,168	Y	NA	
2014	2,179	Y	NA	
2015	1,633	Y	NA	
2016	1,412	N	Y	1,571
2017	1,169	N	Y	1,571
2018	1,343	N	Y	1,571
2019	1,458	N	N	1,745

Element 2 – This element is intended to ensure that PSC users share in the burden of low Area 4CDE catch limits and to mitigate the effects of those low catch limits on remote Alaska communities. To have these effects, the bycatch limit is reduced when catch limits are outside their historical range, with the estimated corresponding increase in the Area 4CDE catch limit being prioritized for users in remote

Alaska communities by providing a supplemental allocation to CDQ groups in the region. IFQ allocations are made after the prioritized allocations. IFQ holders benefit from the general halibut PSC savings achieved under Element 1.

To arrive at the priority allocation, each mt of halibut is equal to 2204.6 pounds. Further, it is assumed that 60 percent of PSC is O26 halibut, which is the approximate share of O26 halibut in bycatch in recent years. In addition, a round pound of halibut is assumed to be 75% of the dressed weight for purposes of converting gross pounds to net pounds (which are used to set halibut directed fishery catch limits). The savings from each metric ton in PSC cap reduction is equal to approximately 1,000 net pounds of O26 that would be available to the directed fishery, when the cap is binding.

- a) In a year when the area 4CDE catch limit is set below 1 million net pounds, halibut PSC limits will be reduced at a rate equal to 50 mt of halibut PSC for each 100,000 net pounds by which the 4CDE catch limit is below 1 million net pounds (with the reduction distributed proportionally among all sectors).
- b) For each mt reduction in PSC under the above provision, 1,000 pounds of directed halibut quota in 4CDE will be allocated to CDQ groups in addition to their annual CDQ allocations, prorated among those groups in proportion to the annual division of CDQ quota.

Example – In a year in which the 4CDE directed fishery catch limit is set at 780,000 pounds, the directed fishery limit would be 220,000 pounds below the 1 million pound threshold. In that year, PSC limits would be reduced by 110 mt to 3,405 mt, assuming that the current limit of 3,515 mt is maintained. Approximately half of the reduction would be applied to the A80 limit, decreasing the A80 cap to 1,690 mt. It is assumed that the IPHC would have considered this reduction in PSC in setting the catch limit at 780,000 pounds. The catch limit would have been lower without the PSC reduction created by this rule (i.e., the catch limit is not adjusted here).

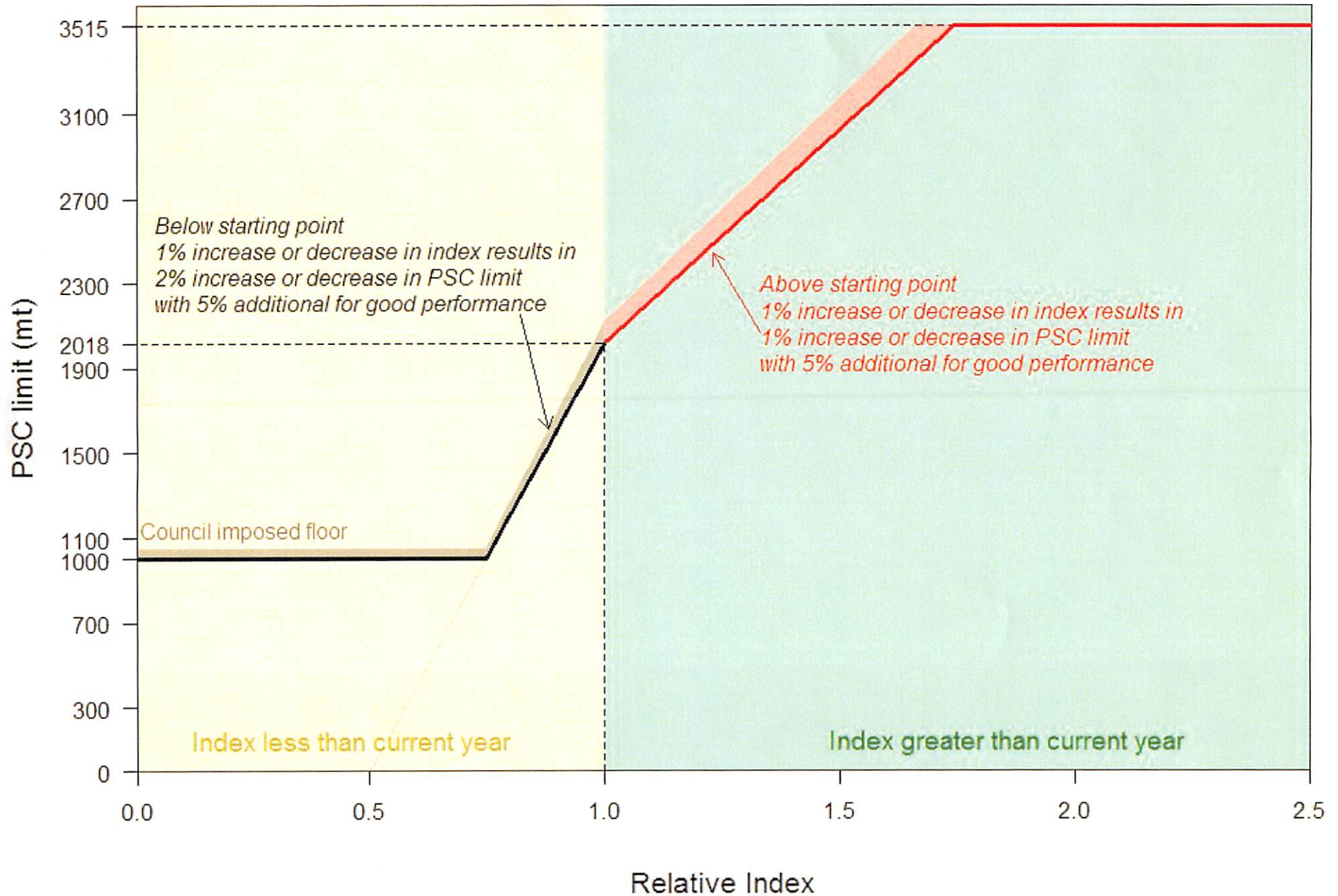
Under the current halibut distribution, CDQ groups receive approximately 44% of the Area 4CDE directed fishery catch limit. Under a 780,000 pound catch limit, CDQ groups would receive approximately 343,200 pounds. Applying the priority allocation proposed here, the CDQ groups would receive an allocation of 110,000 pounds (1,000 pounds for each mt of the 110 mt PSC reduction) prior to any other allocations. The remaining directed catch limit (670,000 pounds) would be apportioned between CDQ groups and IFQ holders under the current distribution (with CDQ groups receiving 44 percent and IFQ holders receiving the remaining 56 percent). The resulting total allocations would be 404,800 pounds to CDQ groups and 375,200 pounds to IFQ holders.

	Current rule	Element 2
A80 Cap	1,745	1,690
CDQ allocation	343,200	404,800

Current purpose and need

The current fixed yield-based halibut PSC caps are inconsistent with management of the directed halibut fisheries and Council management of groundfish fisheries, which are managed based on abundance. When halibut abundance declines, PSC becomes a larger proportion of total halibut removals and thereby further reduces the proportion and amount of halibut available for harvest in directed halibut fisheries. Conversely, if halibut abundance increases, halibut PSC limits could be unnecessarily constraining. The Council is considering linking PSC limits to halibut abundance to provide a responsive

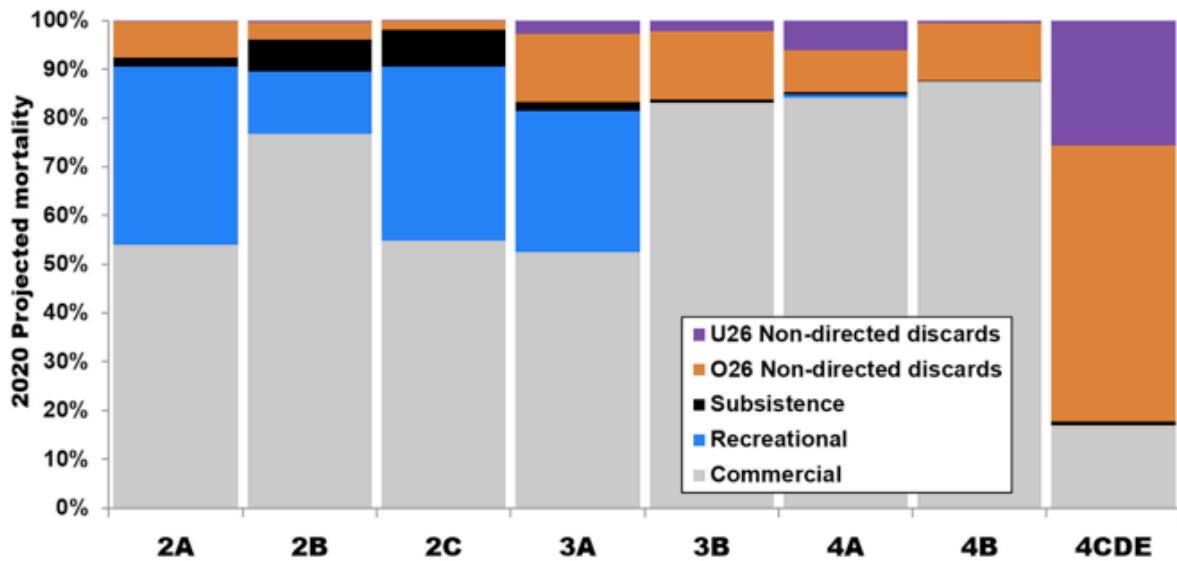
management approach at varying levels of halibut abundance. The Council is considering abundance based PSC limits to control total halibut mortality, particularly at low levels of abundance. Abundance based PSC limits also could provide an opportunity for the directed halibut fishery and protect the halibut spawning stock biomass. The Council recognizes that abundance-based halibut PSC limits may increase and decrease with changes in halibut abundance.



2020 4CDE FCEY set to the default value in the IPHC Projection Tool is: **690,000 lbs**

- **16%** of total projected removals in **2020**
- **2019** FCEY was **33%** of total removals (1.71 M lbs Directed vs 3.498 M lbs Bycatch)
- Directed Fishery's historical dependence is **43%** of total removals (**2002-2011**)

2020 Default allocation to 4CDE is only **37%** of its historical dependence (**2002-2011**)



Groundfish Forum Alternative Proposal for Halibut Abundance Based Management

North Pacific Fishery Management Council
January 2020

December NPFMC Direction

“The Council requests stakeholder input on additional management alternatives and that serve to streamline the action and meet the Council’s objectives to establish abundance - based PSC limits that minimize halibut bycatch to the extent practicable and aid the directed fishery at low levels of abundance.”

Element 1 – Performance Standard

- Annual PSC limit for all sectors shall be 3,515 MT (A80 share is 1,745)
- For A80 sector, performance standard set at 10% (1,571 MT)
- Evaluated Annually
- If the A80 Sector exceed the performance standard in 3 of 5 years, it shall be limited to 1,571 MT in the coming year.

Element 2 – Sharing the Burden

- PSC users share the burden of low Area 4CDE catch limits
- Effects of low catch limits on remote Bering Sea communities are mitigated
- For each metric ton reduction in PSC, 1,000 lbs of directed halibut quota in 4CDE will be allocated to CDQ groups in addition to annual CDQ allocations
- The additional allocation is prorated among those groups using current CDQ distribution formula

Questions?

PSC Halibut to Directed Halibut Conversion

• 1 MT Halibut PSC	=	2204.62 lbs
- A80 U26 Halibut	=	40%
• Round Halibut Available to 4CDE	=	1,322.77 lbs
- Deduct for Net Wt	=	.75%
Total Net Lbs	=	992 Lbs

1 MT A80 PSC = 992 net lbs



D-4: Halibut ABM

**NPFMC February 2020 Meeting
Seattle**

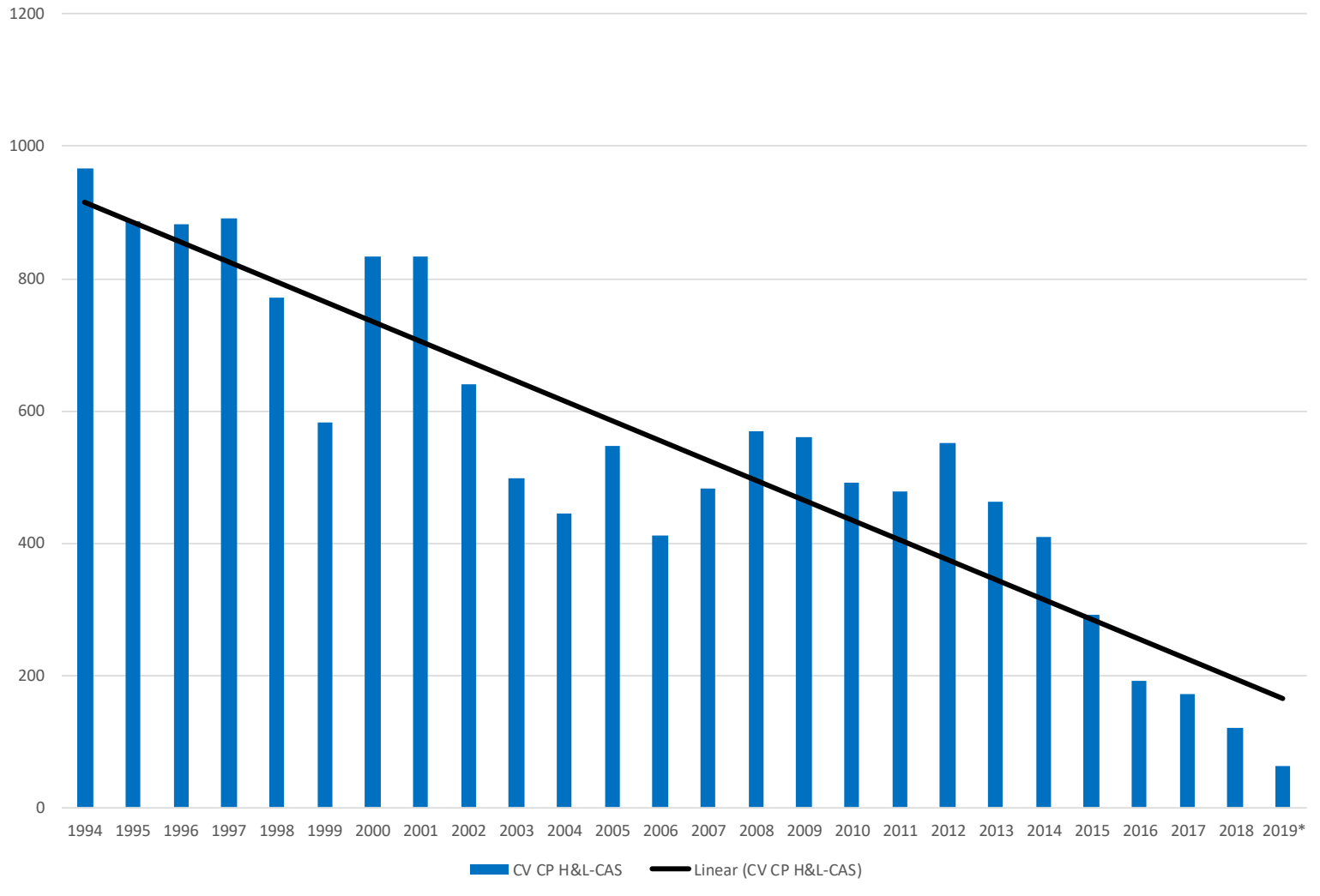
BSAI CP H&L: aka the “non-trawl” sector.

2019 Halibut PSC use update:

- **2019** CP H&L PSC use = **79 mt**
- **2019**: CP H&L portion of BSAI all gear PSC use = **3%**
- **2019**: CP H&L portion of total removals in Area 4ABCDE = **1.8%**

Decreased CP H&L PSC use over time attributed to change in halibut abundance; improved DMRs (over time); and efforts to lower encounter rates. In recent years, further reductions occurred due to the shift of fishing effort further north (resulting in lower halibut encounter rates) in response to northward cod movement further due to the prevailing warm water cycle (which could change). While management would be easier if all conditions remained stable, nature has other ideas. Things change.

BSAI groundfish H&L (CV and CP) halibut PSC mortality, mt (1994-2019)



Streamlining ABM options

- Remove non-trawl from the current action. **Rationale:**
 - Focus action on fisheries with the largest magnitude and proportion of bycatch;
 - CP H&L has a long term history of bycatch reduction from 1994-2019;
 - Magnitude and proportion of bycatch is currently small (3% of BSAI bycatch and <2% of total removals in Area 4);
 - Action could be taken at a future date if needed (i.e. changing environment)
 - No more testimony from me on this issue.
- If retained in the action; in the spirit of streamlining - simplify Alt 3.2a (FLC workgroup proposal) from an 11 X 11 table to a 5 X 5 table (rest of the proposal remains the same; staff revision if needed)

FLC “look-up” table proposal use both indices (EBS BTS and IPHC Area 4) weighted equally. 1.0 is the mean of 1998-2018 halibut abundance in each index. 1.0 is the center of the table, and the middle of each axis.

1.5	594	618	642	666	690	713	737	761	785	809	833
1.4	570	594	618	642	666	690	713	737	761	785	809
1.3	546	570	594	618	642	666	690	713	737	761	785
1.2	522	546	570	594	618	642	666	690	713	737	761
1.1	498	522	546	570	594	618	642	666	690	713	737
1.0	474	498	522	546	570	594	618	642	666	690	713
0.9	451	474	498	522	546	570	594	618	642	666	690
0.8	433	451	474	498	522	546	570	594	618	642	666
0.7	403	433	451	474	498	522	546	570	594	618	642
0.6	379	403	433	451	474	498	522	546	570	594	618
0.5	355	379	403	433	451	474	498	522	546	570	594
	0.5	0.6	0.7	0.8	0.9	1.0	1.1	1.2	1.3	1.4	1.5

FLC ABM Feb 2019 WG Proposal (Alt 3.2a)

- 11 X 11 “Look-up table” with the two surveys (EBS BTS and IPHC Area 4) weighted equally. Standardized to the mean (1998-2018).
- Rationale for both surveys: The size composition of halibut in the CP H&L sector falls between the size composition in both surveys.
- The mean (1998-2018) of each survey represents 1.0 (avg halibut biomass for the time period).
- The middle of the table is the intersection of 1.0 for both surveys and is the starting reference point (i.e. the PSC cap at average halibut biomass)
- PSC cap then goes up to the upper right and down to the lower left from changes in the combination of the two survey indexes.
- Would like to retain alternative in the analysis.

**For purposes of simplifying proposal: Revised FLC proposal as a 5X5 table.
 Revised proposal is within the scope of the current range of the alternatives
 but to be analyzed would need an explicit reference by Council to staff.**

	EBS BTS <0.50) Low	EBS BTS >=0.50 (and <0.80) Med Low	EBS BTS >=0.80 (and <1.2) Med	EBS BTS >=1.20 (and <1.5) Med High	EBS BTS >= 1.5) High
IPHC >= 1.5 High	594 mt	654 mt	714 mt	774 mt	833 mt
IPHC >= 1.20 (and <1.5) Med High	534 mt	594 mt	654 mt	714 mt	774 mt
IPHC >= 0.80 (and <1.25) Med	474 mt	534 mt	594 mt	654 mt	714 mt
IPHC >= 0.50 (and <0.80) Med Low	414 mt	474 mt	534 mt	594 mt	654 mt
IPHC <0.50 Low	355 mt	415 mt	475 m	535 mt	594 mt

Magnitude of change by step by table: the proportion of change is greater at lower index values (and lower resulting PSC limits)

- **11 X11 table = minimum change (one step) = 24 mt (3% to 7%)**
- **5 X 5 table = minimum change (one step) = 60 mt/step (7% to 17%)**
- **3 X 3 table = minimum change (one step) = 120 mt/step (15% to 34%)**
- **Council Objectives include:** *“Provide for some stability in PSC limits on an inter-annual basis.”* In a 3X3 table, the magnitude (and proportion) of change in PSC limit in one step can potentially be quite large. There could be more than a one step change in a year.

U26/O26 Size composition (in N, numbers of fish, 2008-2016 avg.), from Oct 2017 discussion paper, Table 6, p. 37.

<u>Survey/Sector</u>	<u>%U26</u>	<u>% O26</u>	<u>%O32</u>
EBS shelf trawl	80%	20%	6%
IPHC survey	10%	90%	55%
NPT groundfish	87%	13%	3%
PT groundfish	85%	15%	3%
H&L groundfish	57%	43%	10%

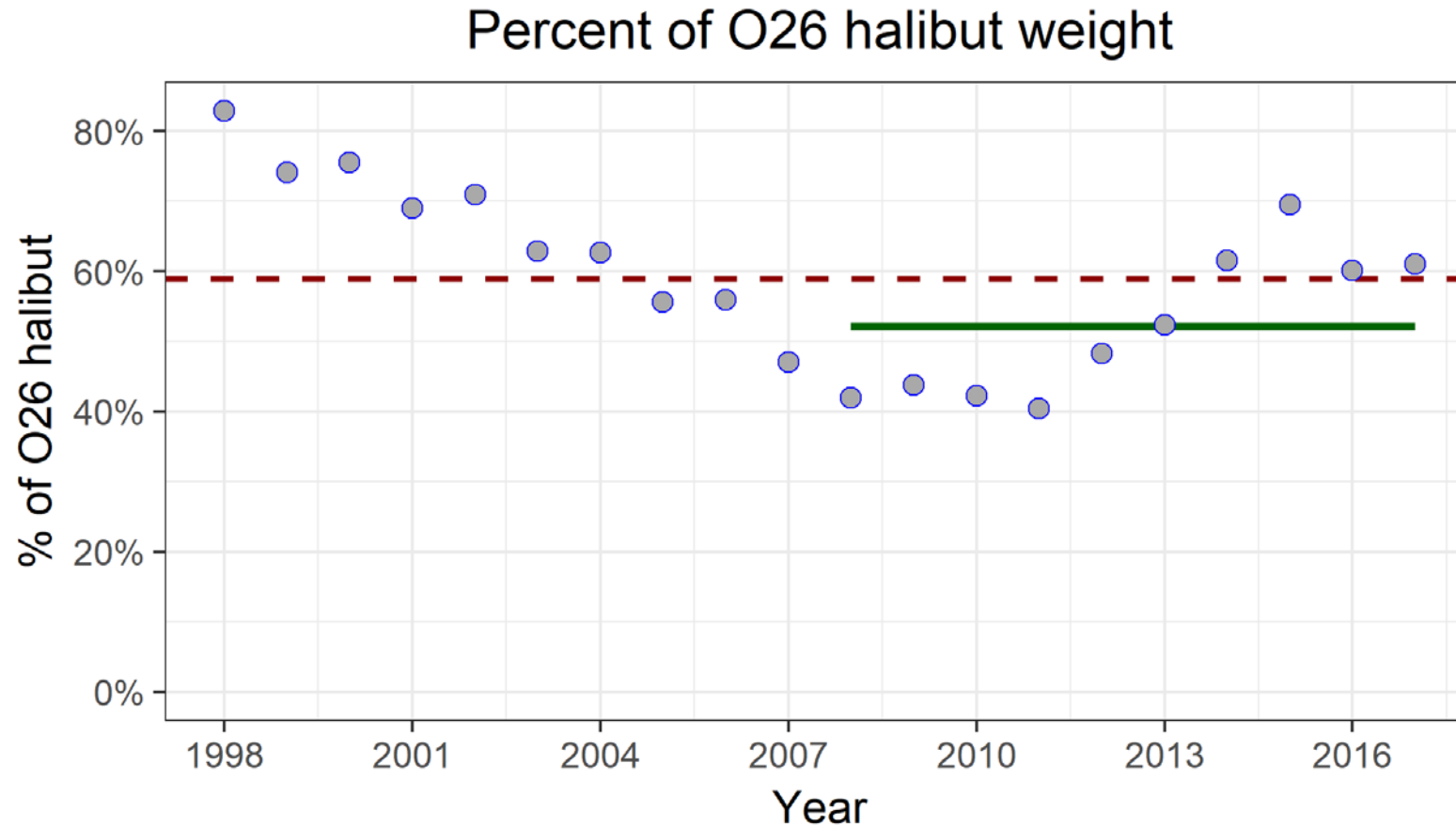
Does the O26 standard actually improve performance – or would it be better to use as long term monitoring metric?

- **SSC June 2018 minutes:** *“Two important questions followed from this section: 1) whether the performance standard improves bycatch performance relative to objectives; and 2) whether industry can control factors that improve performance. These questions must be considered in defining what is meant by “performance” under an O26 standard or metric.”*
- The ability of the fleet to manage for O26/U26 proportion is unknown. Fleet movement to reduce O26 proportion may have unintended consequences that may confound efforts to reduce overall bycatch.

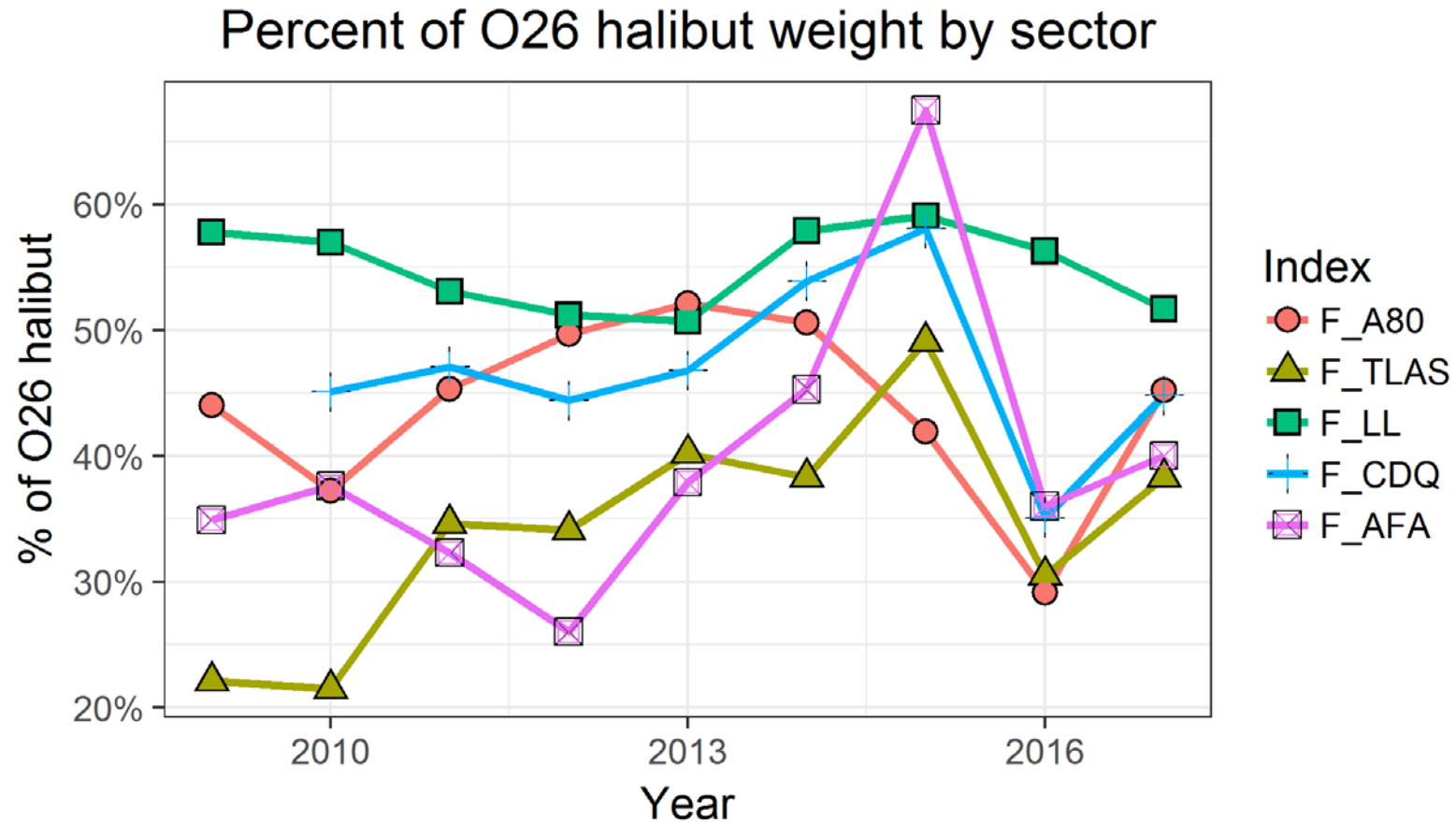
O26 Performance Standard Data Considerations

- Some concerns on O26 data collected in fisheries – but even if remedied:
- Performance standard has potential for increased impacts on U26. The benefit would then be increased short term O26 -- minus the potential long term impacts on U26 (adjusted for natural mortality).
- There is large interannual variation of O26 proportion in both surveys (EBS and IPHC).
- There is variation in the O26 proportion across IPHC areas in the same year.
- O26 varies considerably by sector year to year (and in the same year).

% O26 by weight in EBS trawl survey (1998-2017) varies between 40% and 80% (June 2018 discussion paper)



% O26 by sector (2009-2017) has significant variation



Considerations for an O26 performance standard (June 2018, Discussion Paper)

“The Council should consider two things:

- (1) does the agency have the necessary information on the required timeline to track and manage the standard, and*
- (2) can the fleet reasonably be expected to take steps towards this goal throughout the fishing year and under all circumstances – years of high/low halibut abundance, high/low groundfish TACs.”*

Can the fleet manage for O26?

- *“The Council might want to have data **or a strong belief** that vessels are able to exert at least a measure of control over the general size of the halibut that they encounter as PSC.”*
- *“If the standard is denominated (e.g., size ratio) in a way that the fleet does not have tools to achieve when acting in good faith, then it functions more so as an item of chance.”*
- *“ In addition, the Council should consider whether the fleet’s tools that could potentially influence size selectivity of halibut bycatch would be sufficient to meet the performance standard in a future regime with a different ratio of large/small halibut in the stock as a whole.” **EBS BTS O26% varies between 40% and 80% over time.***

Council Motion June 7, 2018 Agenda Item D5: BSAI Halibut 026 Performance Standard

- The Council moves to take no further action on this agenda item.