



## C2 Small Sablefish Release

April 2025

### Action Memo

Council Staff: Sara Cleaver  
Other Presenters: Andrew Olson (AKRO), Jon McCracken (McCracken & Associates)  
Action Required: 1. Review analysis for final action  
2. Recommend preferred alternative, or ask for additional analysis

### BACKGROUND

The Council is considering taking final action to allow sablefish IFQ/CDQ harvesters using fixed gear in the BSAI and GOA to carefully release small sablefish. “Small sablefish” for the purposes of the proposed action is defined as sablefish less than 22 inches in total length. Current regulations require full retention of sablefish in these fisheries if any permit holder aboard holds unused sablefish IFQ, with the exception of catcher processors (CP) harvesting sablefish IFQ. CPs fishing sablefish IFQ may discard sablefish of any size. The proposed action is intended to provide limited flexibility to fixed gear sablefish IFQ/CDQ participants who encounter catches of small, low-value fish as recent large year classes of sablefish recruit to the fishery.

Under the existing regulations, CPs using fixed gear to fish sablefish CDQ are regulated in a manner that is more restrictive than CPs using fixed gear to fish sablefish IFQ. As part of this action, the Council can recommend how to align retention requirements for these sectors, per requirements under the Magnuson-Stevens Fishery Conservation and Management Act.<sup>1</sup> There are two options for aligning these regulations. Recognizing these changes are new to this version of the analysis, a full description of these changes is included in Section 2.1.2.

The proposed action also includes several elements, some of which are decision points for the Council. The elements focus on: the application of a discard mortality rate to IFQ/CDQ sablefish (Element 1), how to monitoring, enforce, and account for discards as needed for inseason management and to inform the stock assessment (Elements 2 & 3), timing for a review of the action (Element 4), and options for careful release requirements and gear modifications (Element 5).

The analytical document associated with this analysis includes several appendices that provide supporting analysis and additional context. These include:

- Sablefish size/age conversion table and equation (Appendix 1)
- Responses to SSC comments (Appendix 2)

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<sup>1</sup> Section 305(i)(1)(B)(iv) of the MSA: REGULATION OF HARVEST.—The harvest of allocations under the program for fisheries with individual quotas or fishing cooperatives shall be regulated by the Secretary in a manner no more restrictive than for other participants in the applicable sector, including with respect to the harvest of nontarget species.

- The AFSC simulation analysis and results for projecting ABC for Alaskan sablefish (Appendix 3)

The previous analysis related to this action was reviewed in June 2024. The Council may choose take final action or request additional review. **Main decision points for the Council include:**

- Small sablefish retention requirements for *catcher vessels*
- Sablefish retention requirements for *catcher processors*
- Element 2: Establishing an Incidental Catch Allowance(s) (Option 1: Separate ICAs for CVs and CPs or Option 2: one combined ICA for all vessels).
- Element 4: Review timing
- Element 5: Careful release requirements, gear modifications