

D1: Charter Halibut Permits Data Request – Discussion Paper, Committee report

AP Motion

The Advisory Panel recommends that the Council initiate an analysis to explore the potential effects of eliminating or modifying the cap for Guided Angler Fish described under (§ 300.65(c)(5)(ii)(D)(1)(iv)) In IPHC Areas 2C and 3A either permanently or for a set duration.

Analysis should also include a section exploring the possibility of NMFS to change the annual transfer cap of IFQ to the RQE described at **(679.42(f)(8)(i))** from 1% to 2%.

Amendment to strike “The advisory panel recommends that the council initiate an analysis to explore the potential effects of eliminating or modifying the cap for Guided Angler Fish described under (§ 300.65(c)(5)(ii)(D)(1)(iv)) In IPHC Areas 2C and 3A either permanently or for a set duration.”
Amendment failed 14-4

Motion passed 14-4

Rationale in Support of Motion

- *GAF provides annual flexibility to CHP holders and operators who own or lease commercial QS. The RQE provides a sector-wide benefit through permanent acquisition of quota share with the interest of providing regulatory stability. The AP noted it is important to analyze whether meaningful GAF access can be maintained while preserving appropriate safeguards for the commercial sector and fully accounting for commercial, charter, and quota-market effects will provide the tools required for council action.*
- *The AP recommended that the analysis should evaluate alternatives for maintaining a meaningful, separately defined GAF transfer allowance while preserving appropriate limits and safeguards on the overall amount of commercial halibut quota made available to the charter sector. It should consider recent demonstrated GAF use, impacts on commercial QS availability and value, impacts on entry-level commercial participants, and the effects on CHP holders that rely on GAF including CHP holders who own commercial QS/IFQ and self-transfer GAF.*
- *A significant percentage of 3A GAF transfers over time have been self transfers. An unintended impact of the GAF : RQE roll out is to those commercial fishermen / charter operator QS holders, and analysis could provide a roadmap to extending the ability to self transfer. While 2c has fewer self transfers, anyone qualified to purchase QS and who did so to self GAF should have a path analyzed to be allowed to continue to do so.*
- *The intent of the second element of the motion recommends that the council evaluate increasing the annual RQE QS acquisition cap from 1% to 2% in Area 2C, without changing the existing 10% cumulative limit on RQE QS holdings. This would allow for a faster acquisition of quota share. Evaluating this interaction before increased RQE holdings begin to displace the existing and tenured management tool. GAF and the RQE serve different purposes.*

- *An AP member commented that the 2c fishery is currently on the floor of commercial viability, and decreases in 2c management measures result in almost linear increases in the unguided rental sector. Inaction here could drive more operations to bypass management measures by providing unguided rental – they simply won't be able to compete. The AP felt analysis exploring changes that could be made so that GAF use would not be constrained as the RQE acquired quota is warranted.*

Rationale in Opposition of Motion

- *AP members in opposition felt that allowing GAF to continue on and even expand alongside the RQE would create a much larger re-allocation scheme than the 10% reallocation that was analyzed and decided upon by the Council the last time the Catch Share Plan was opened up to reconsider allocations.*
- *The AP noted that the RQE is only in its first year of activity, but that they have raised money, bought quota, and though the relief is not immediate, the program could be considered a success by those metrics. Time should be given for the RQE to grow their allocation and function before making further reallocation changes.*
- *AP members felt that the underlying problem with the decrease in halibut harvest in the charter sector is primarily driven by abundance of the resource, noting that between 2017-2026 both charter and commercial have taken a 30% reduction in halibut allocation. During this same time period, the AP noted many charter lodges and independent operators have diversified into the assisted unguided model. Since this model gives the ability to market trips where an angler can harvest 2 halibut of any size if you drive the boat yourself, the AP felt it was driving a significant increase in the harvest by this sector. In 2025, the unguided sector was over their annual allocation by 35%. Since that harvest is deducted from the total allowable catch before allocations for the commercial and charter sector are set, in 2C, the impact has become significant and the 2026 allocation for charter and commercial was deducted by 10%, not due to conservation, but to increased harvest in the unguided recreational halibut sector.*
- *AP members felt the issue is not the Catch Share Plan, the RQE or the phase out of GAF, but is due to a combination of record low abundance and a growing unguided sector. The unguided fleet is eroding the allocation to the charter sector and the charter sector's response is to say "we need more allocation to our sector."*
- *The way this motion is written would allow for an analysis of an unlimited reallocation through GAF lease to the charter sector. This is opening up a re-allocation issue that was "solved" through the creation of the RQE before the RQE has even had a chance to function. Re-opening the re-allocation options is the same as re-opening the Catch Share Plan.*
- *Before any re-allocation schemes, such as extending GAF, are explored, there needs to be a mechanism to monitor and regulate the unguided rental boat sector. As long as that sector continues to grow and harvest halibut at a 2 fish of any size level, any amount of re-allocation will not help. The unguided rental boat issue to take precedence over new analysis or new action.*