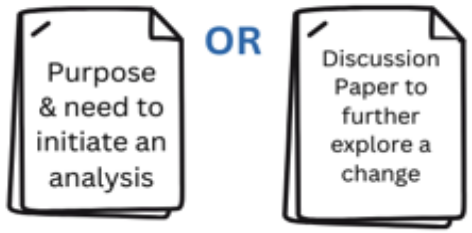
Public comment and Council direction

Give input on scope and content of planned review.

Public comment and Council direction on the review *(not the program)*

The review should adequately assess impacts of the program.
The review should also evaluate if the program is meeting its goals and objectives.

If the Council decides to make changes to the program:



Program Review Schedule & Current Reviews

D3 Central Gulf of Alaska Rockfish Program Review

April 2025

This study is intended to meet the requirements for the Central GOA Rockfish Program (RP) Program Review and the Allocation Review.

Presentation Overview:

- Dashboards are presented in Section 3. The intent is to provide a high-level overview of the RP fisheries combined and focus on TACs, catch, participation, value, and diversification.

ROCKFISH PILOT PROGRAM OBJECTIVES:

Four primary objectives were defined when the Rockfish Pilot Program was developed:

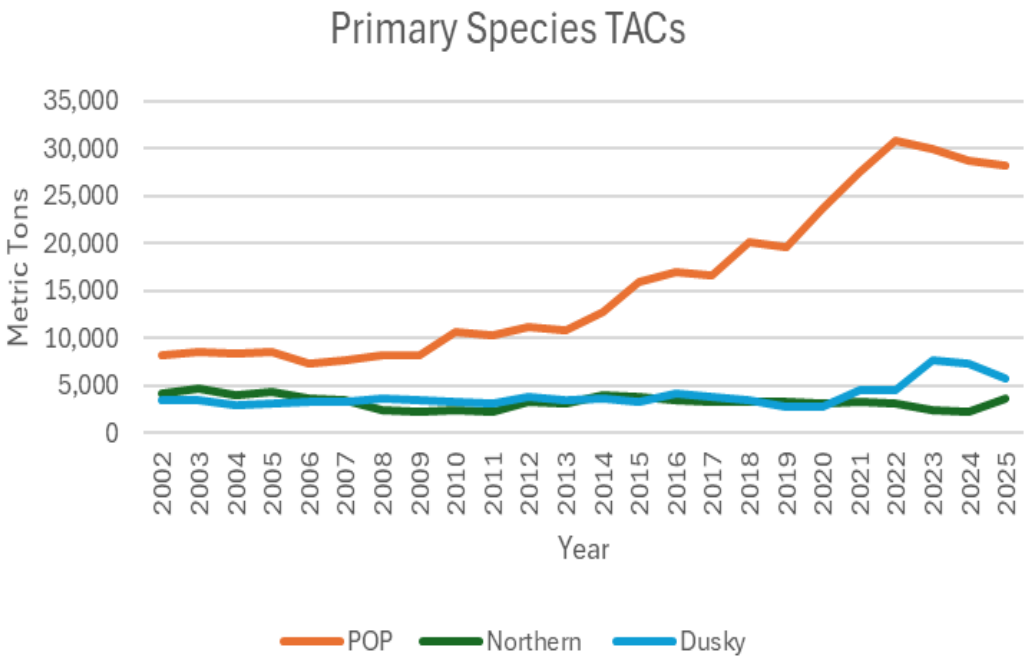
- reduce bycatch and discards,
- encourage conservation-minded practices,
- improve product quality and value, and
- provide stability to the processing labor force (Kodiak).

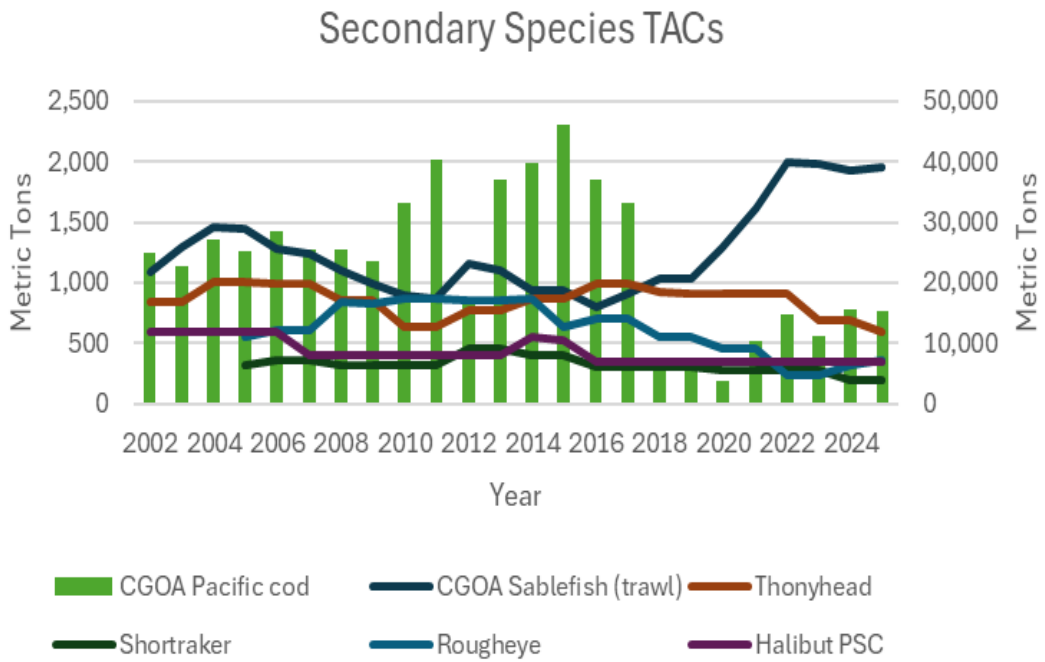
ROCKFISH PROGRAM OBJECTIVES:

Retain the gains realized under the RPP

- conservation,
- management,
- safety, and
- economic.

Conservation: TACs



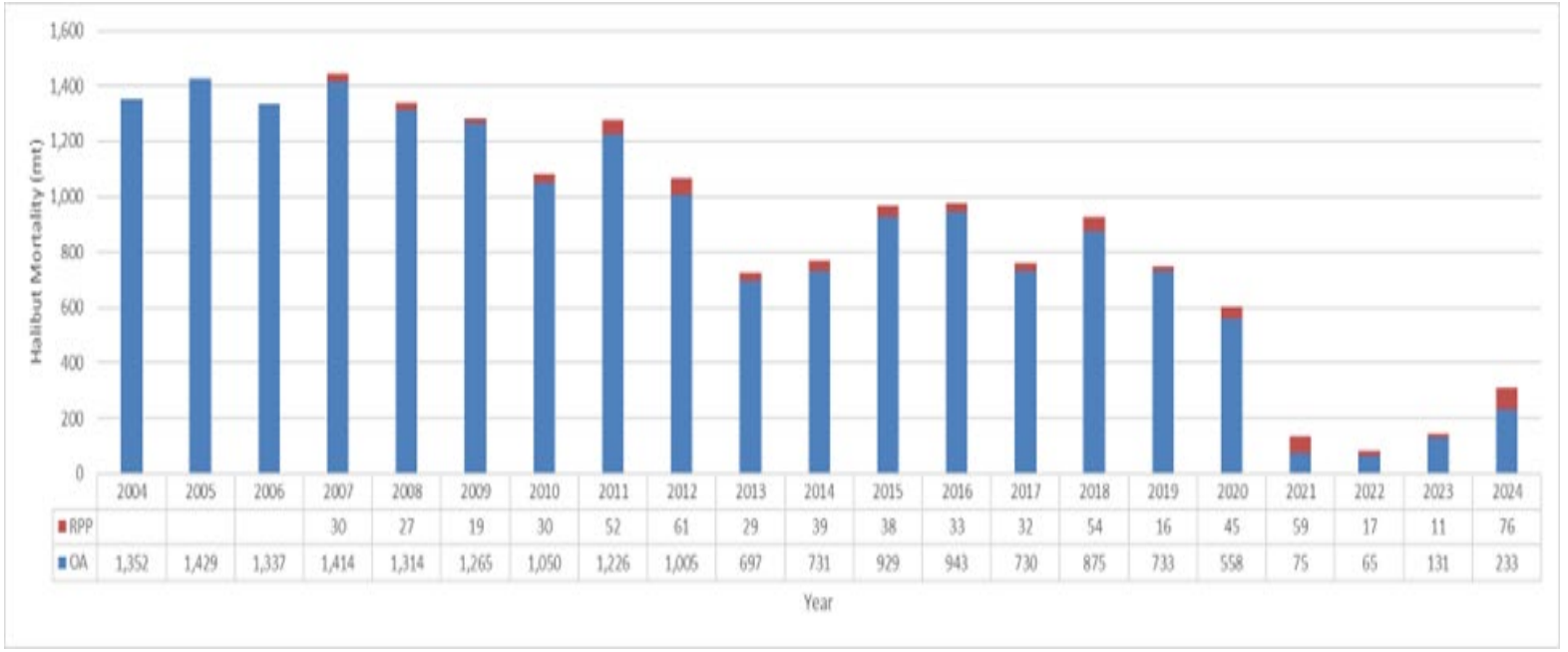


CONSERVATION: RETENTION AND RETENTION RATES

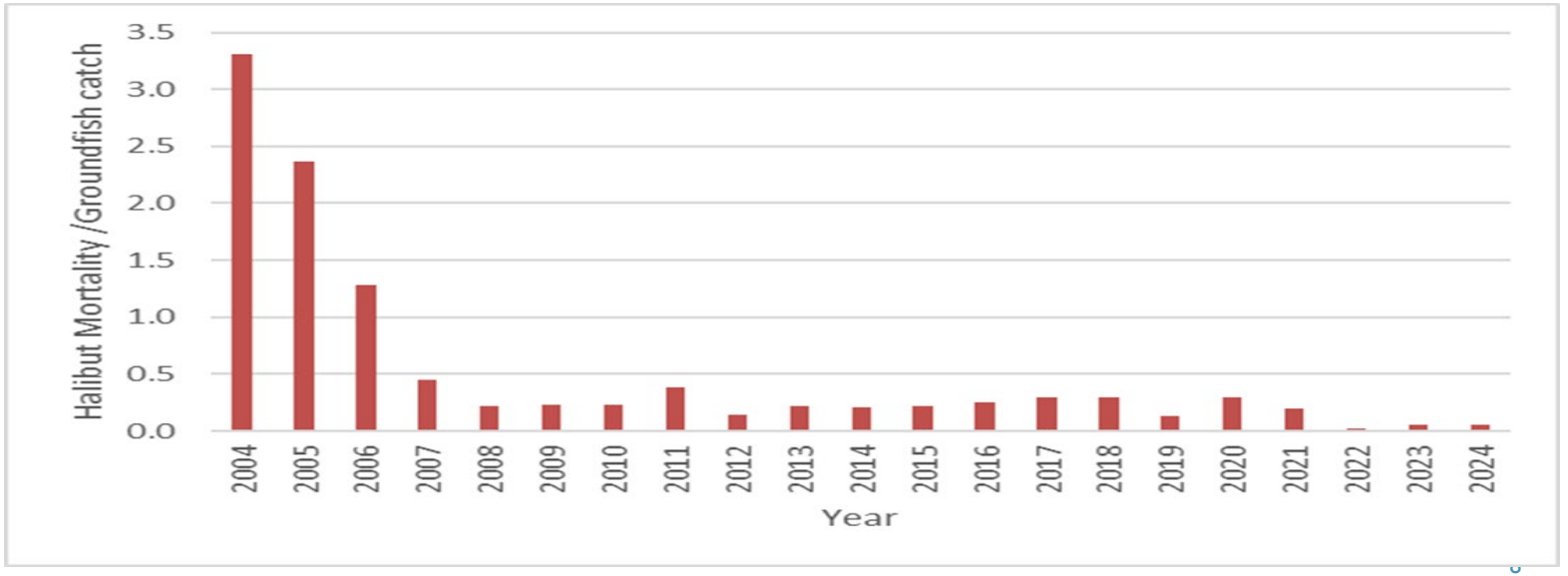
- Retention rates of primary species in the RPP and RP have been very high, with rates approaching 100 percent for each fishery most years. Retention rates were slightly lower in 2011. That was the only year when reported rates dropped slightly below 99 percent for Pacific ocean perch and Northern rockfish. Dusky rockfish retention rates remained above 99 percent that year.
- Retention rates are considerably lower in the open access fisheries. Since the RPP was implemented. Lower retention rate is likely tied to the quality of the rockfish delivered or the ability of the plant to process small amounts of rockfish that are taken as incidental catch to Pacific cod, pollock, or flatfish target deliveries that are harvested under race-for-fish conditions (unless a voluntary cooperative can be formed).

CONSERVATION: CATCHER VESSEL HALIBUT PSC

- Approximately 60 mt of the 76 mt RP halibut mortality in 2024 was attributed to a single trip fall sablefish trip. The observer counted 86.4 kg, of halibut out of a total sample size of 563.18 kg. The extrapolated count applied to all catches equaled about 60 mt of halibut due to the number of unsampled hauls and a high arrowtooth flounder discard rate.

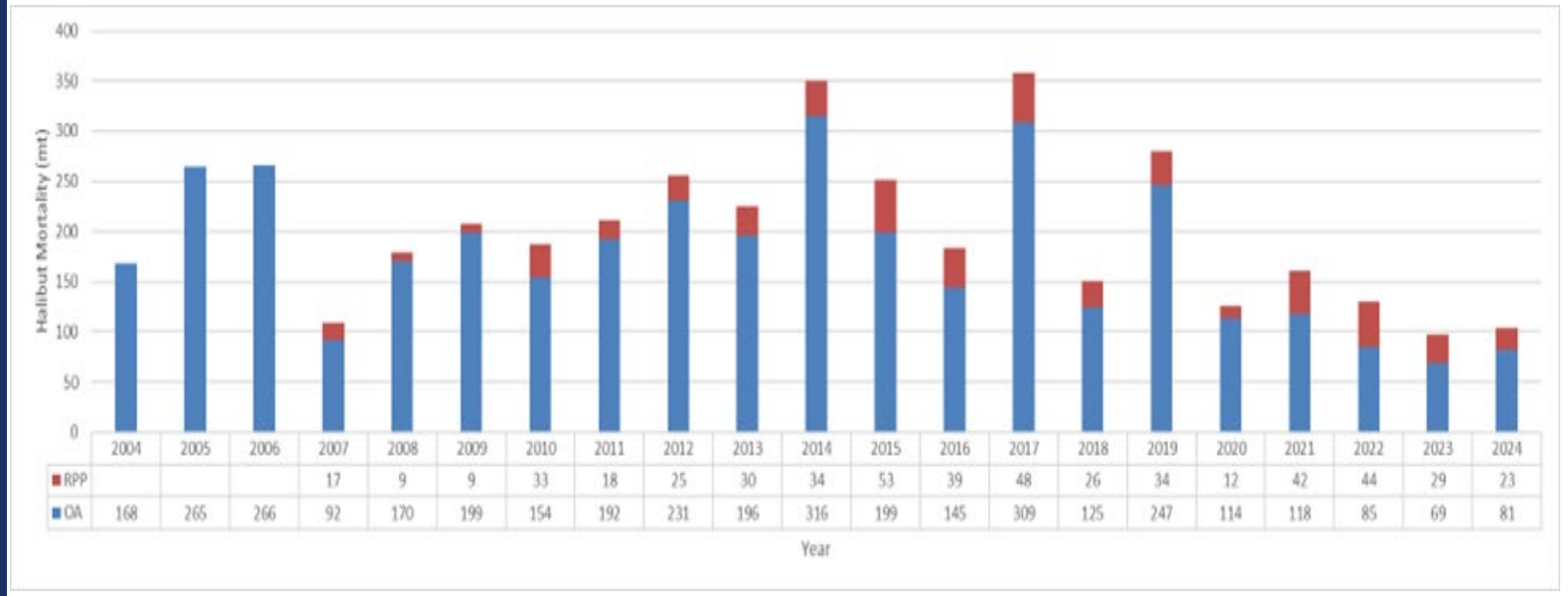


	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
RPP				30	27	19	30	52	61	29	39	38	33	32	54	16	45	59	17	11	76
OA	1,352	1,429	1,337	1,414	1,314	1,265	1,050	1,226	1,006	697	731	929	943	730	875	733	558	75	65	131	233

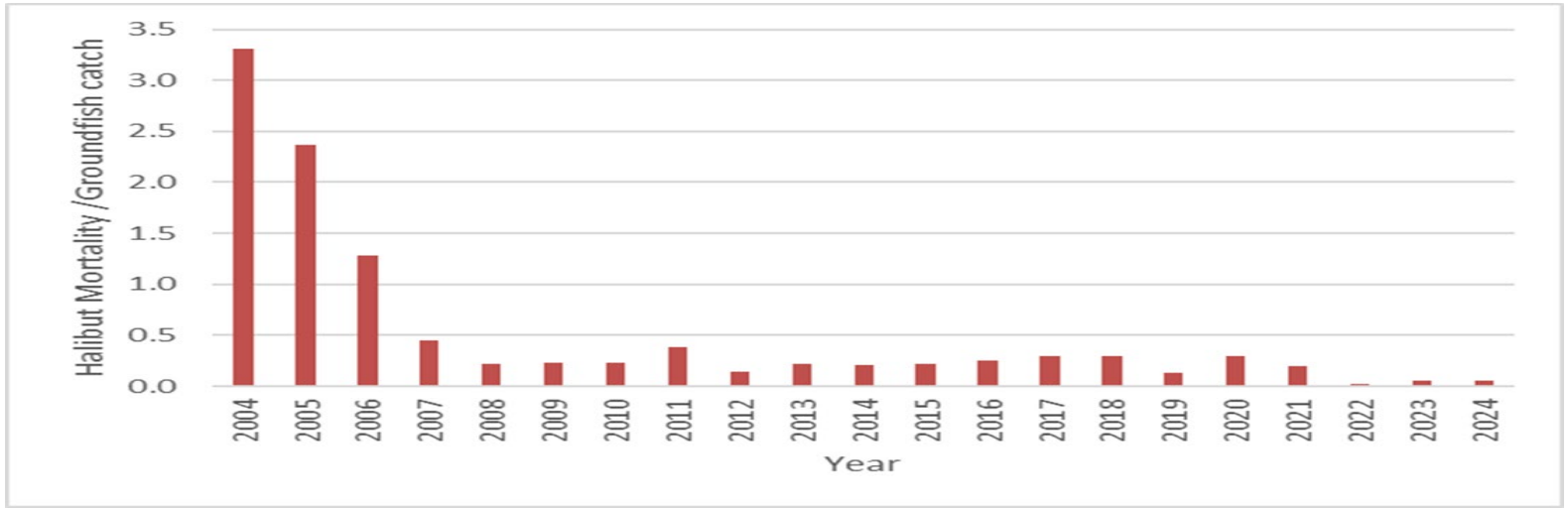


CONSERVATION: CATCHER PROCESSOR HALIBUT PSC

Halibut PSC mortality in the RPP was relatively low from 2007 through 2009. Those were years when few CPs assigned their LLP licenses to rockfish cooperatives and catch of CPs not in cooperatives was assigned to the open access fishery. Since 2010, total halibut PSC mortality in the RPP/RP ranged from 12 mt to 53 mt. Mortality was highest in 2015 (53 mt) and was lowest in 2020 (12 mt).

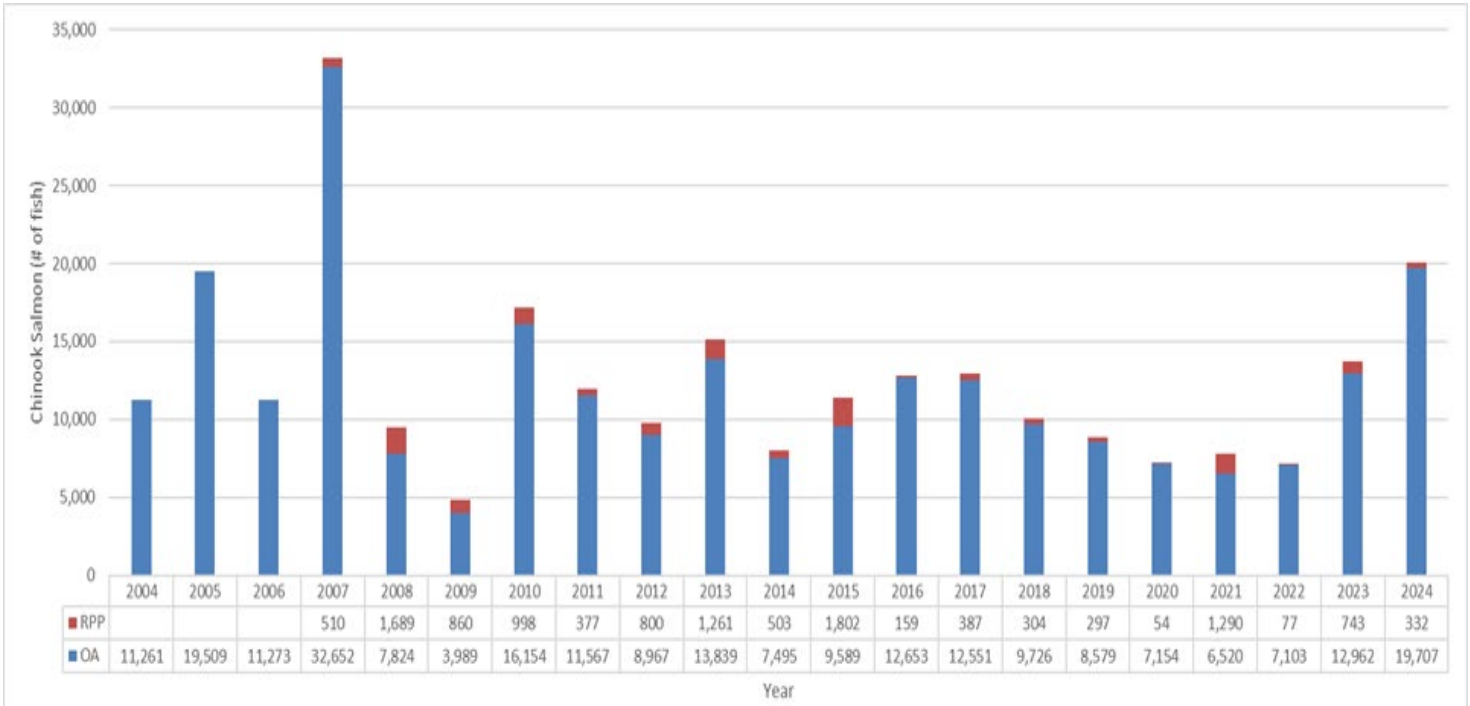


	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
RPP				17	9	9	33	18	25	30	34	53	39	48	26	34	12	42	44	29	23
OA	168	265	266	92	170	199	154	192	231	196	316	199	145	309	125	247	114	118	85	69	81

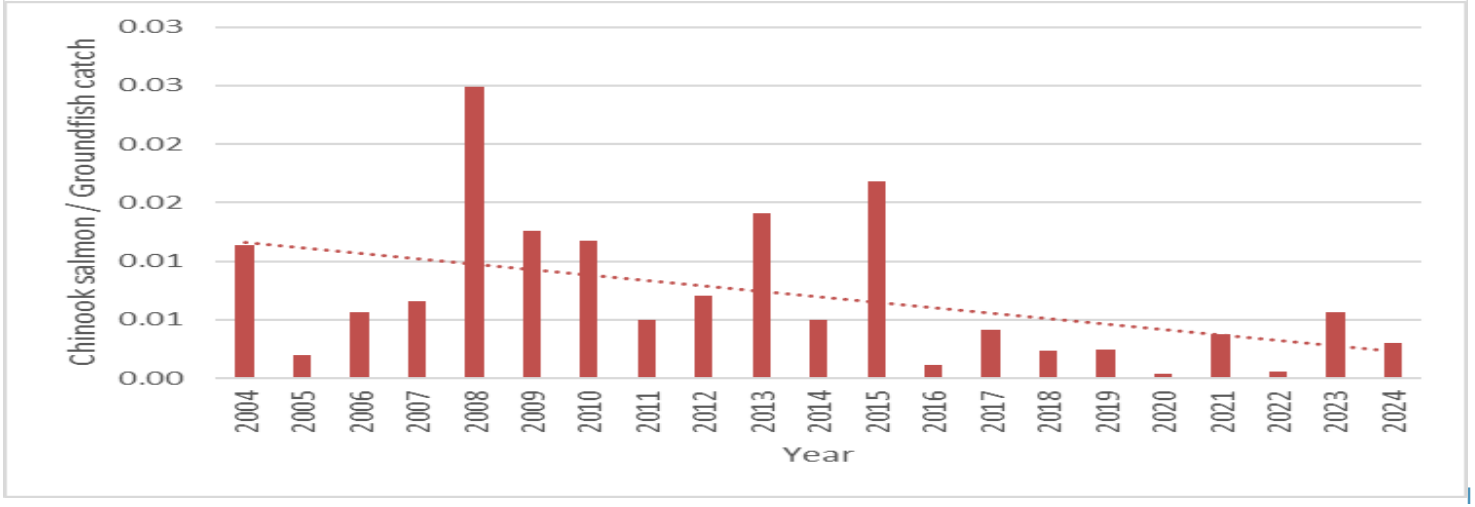


CONSERVATION: CATCHER VESSEL CHINOOK SALMON PSC

Chinook salmon PSC limits were not implemented for the non-pollock trawl fisheries in the GOA until 2015. Before 2015, CV Chinook salmon PSC in the RP ranged from 377 fish to 1,689 fish. The annual variation is likely due to a variety of factors that include the number of Chinook salmon on the fishing grounds, PSC estimation methods, the use and effectiveness of excluder devices, and communication of encounter rates by harvesters on the fishing grounds. The variation is partly due to the complexities of avoiding Chinook salmon and extrapolation methods used to estimate total PSC from basket samples.



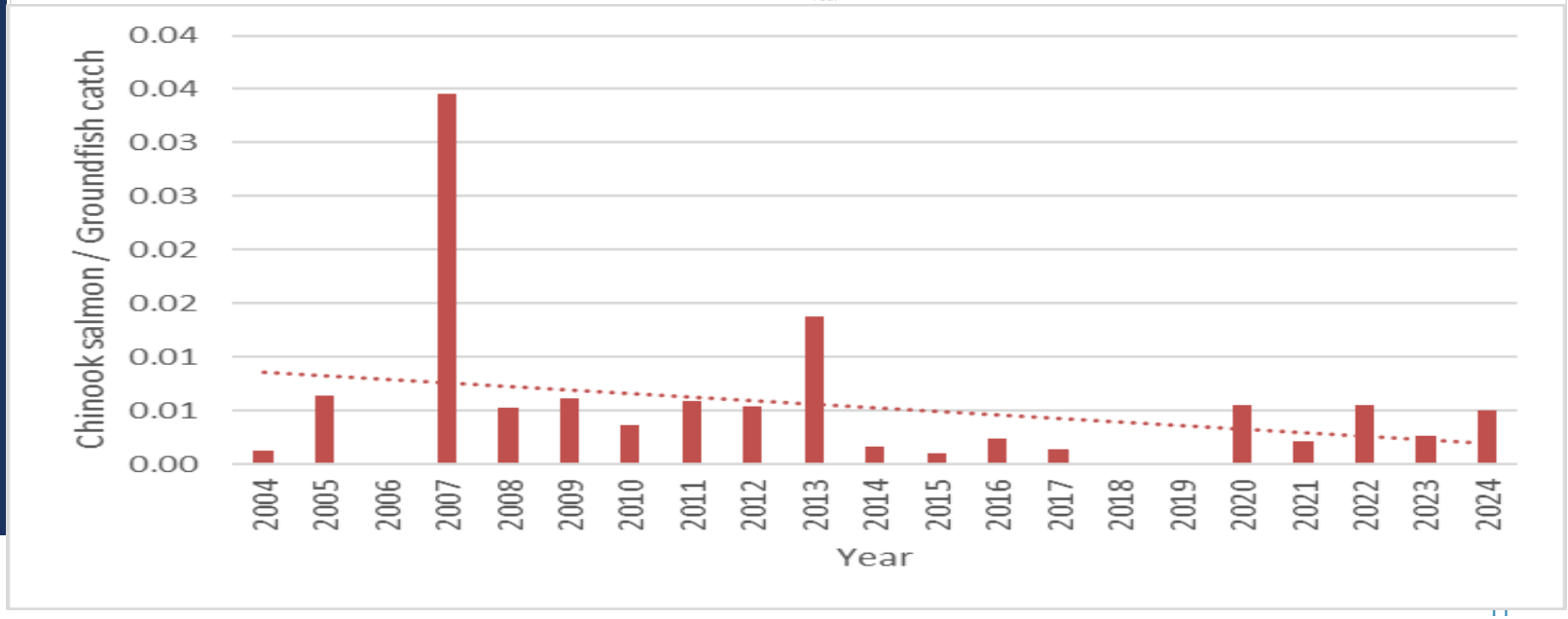
	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
RPP				510	1,689	860	998	377	800	1,261	503	1,802	159	387	304	297	54	1,290	77	743	332
OA	11,261	19,509	11,273	32,652	7,824	3,989	16,154	11,567	8,967	13,839	7,495	9,589	12,653	12,551	9,726	8,579	7,154	6,520	7,103	12,962	19,707



CONSERVATION: CATCHER PROCESSOR CHINOOK SALMON PSC

CPs had above average Chinook salmon PSC usage in the past three years, but almost no Chinook salmon PSC usage in either 2018 or 2019. Chinook salmon PSC usage in 2013 was greater than any other year in the range of years shown. During 2013, Chinook salmon PSC was relatively large in both the RP and the open access fisheries

	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
RPP							248	323	439	1,003	146	53	235	104	1	0	560	197	844	438	715
OA	290	454	665	1,862	2,473	1,291	1,760	1,286	962	2,083	515	555	146	455	0	0	252	1,145	424	539	666



Conservation: Reducing Sea Floor Contact

- The 2022 Evaluation of Fishing Effects on Essential Fish Habitat report was used to provide information in Section 15.
- Figures for the three primary species show the habitat reduction for the Core EFH Area.
- The percentage of habitat disturbance is less than 5 percent and is steady or declining for all three species. Habitat reduction tends to be less than 1 percent in most areas, but the highest habitat reduction levels focus on the same general areas for all species.
- Because of the gear costs and the rocky habitat rockfish species prefer, there are economic incentives to avoid bottom contact to the extent practicable. Slowing the fishery appears to have resulted in modest improvements in reducing sea floor contact and the associated negative impacts on EFH.

Program Objective: Past Changes to Improve Management

- The RP has allowed cooperatives to manage vessel allocations and oversee transfers within the cooperative. It also provides a mechanism for cooperative members to agree to terms of conduct that help the fishery meet the Council's objectives.
- Eleven management changes under Amendment 111 are presented in Section 2.1.4.
- Four management changes under Amendment 113 are presented in Section 2.1.5.
- Section 2.1.6 addresses the expiring limitations under the Frank LoBiondo Coast Guard Authorization Act of 2018 (Public Law Number: 115-282) and notes that the Council considered the issue of CP sideboard limits in the West Yakutat District and the WGOA under the AM80 Program review last year and did not recommend any changes to what was presented in that report.
    - In summary, Page 67 of the Am 80 Program review noted that "an AM80 vessel would keep its sideboards in the event it is replaced, and an AM80 replacement vessel would maintain its original sideboards and also assume the sideboards from the vessel it replaced. A vessel subject to both original and assumed sideboards, would be held to the most restrictive sideboard at any time. Nothing in the AM80 replacement vessel regulations removes sideboards from an AM80 vessel or vessel sideboards from the Rockfish Program."

Program Objective: Potential Future Changes to Management

- Section 16.1 provides an update on NMFS management changes since Amendment 113
- It notes that the NMFS Alaska Regional Office Catch Monitoring and Control Plan (CMCP) Specialist in Kodiak retired and there are currently no plans to backfill that position. This will reduce cost recovery costs.
- This position supported accurate catch sorting and species identification for managing the RP, so NMFS must rely on other sources to verify catch information.
- NMFS staffing change coincides with an industry-led pilot project that is kicking off in April 2025 to place shoreside samplers at the rockfish processors and determine whether electronic monitoring (EM) could replace the need for at-sea observers.
- Regulations at 50 CFR 679.28(g)(8), pertaining to the CMCP Specialist, could be considered for removal since these were utilized by local staff to ensure compliance with regulations during rockfish offloads, if the EM work leads to implementing that monitoring tool.
- If the Council chooses to proceed with EM in the Rockfish Program, NMFS will streamline existing regulations as necessary to comply with the Unleashing Prosperity Through Deregulation order that states "unless prohibited by law, whenever an executive department or agency publicly proposes for notice and comment or otherwise promulgates a new regulation, it shall identify at least 10 existing regulations to be repealed."

Management of the Fishery

Two issues that have been topics of discussion by industry and how NMFS has indicated it is interpreting the regulations.

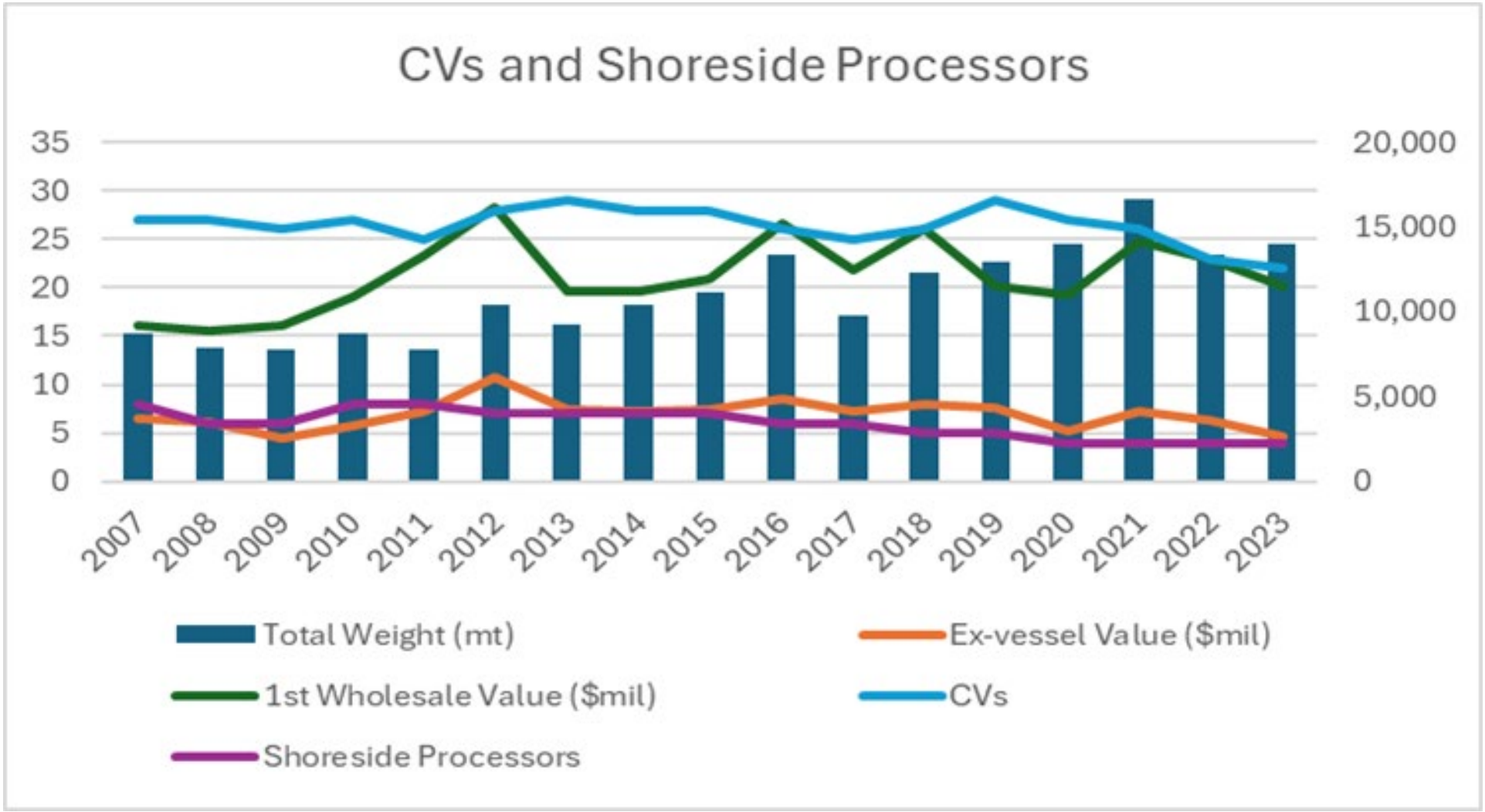
- **QS use cap calculation**. A person may not hold or use more than 4% of the QS assigned to the CV sector or 40% of the QS assigned to the CP sector. The cap calculation is based on the total quota used during the year. NMFS defines use as the sum of quota a person held during the year and not the amount harvested or processed during the year. This distinction can impact when a person reaches the use cap if they transfer quota during a year since any quota transferred accrues against the cap.

- **Processor use caps**. Processors may not receive or process more than 40% of the CQ issued to the CV sector (rockfish primary species, Pacific cod, and sablefish). These caps are applied at the individual processing plant level (as identified by Federal Processing Permits issued to individual plants), not at the processing corporation/ownership level. For example, if a firm owned two plants located in Kodiak and each plant had its own Federal Processing Permit, that firm could process up to 80% of the relevant CQ.

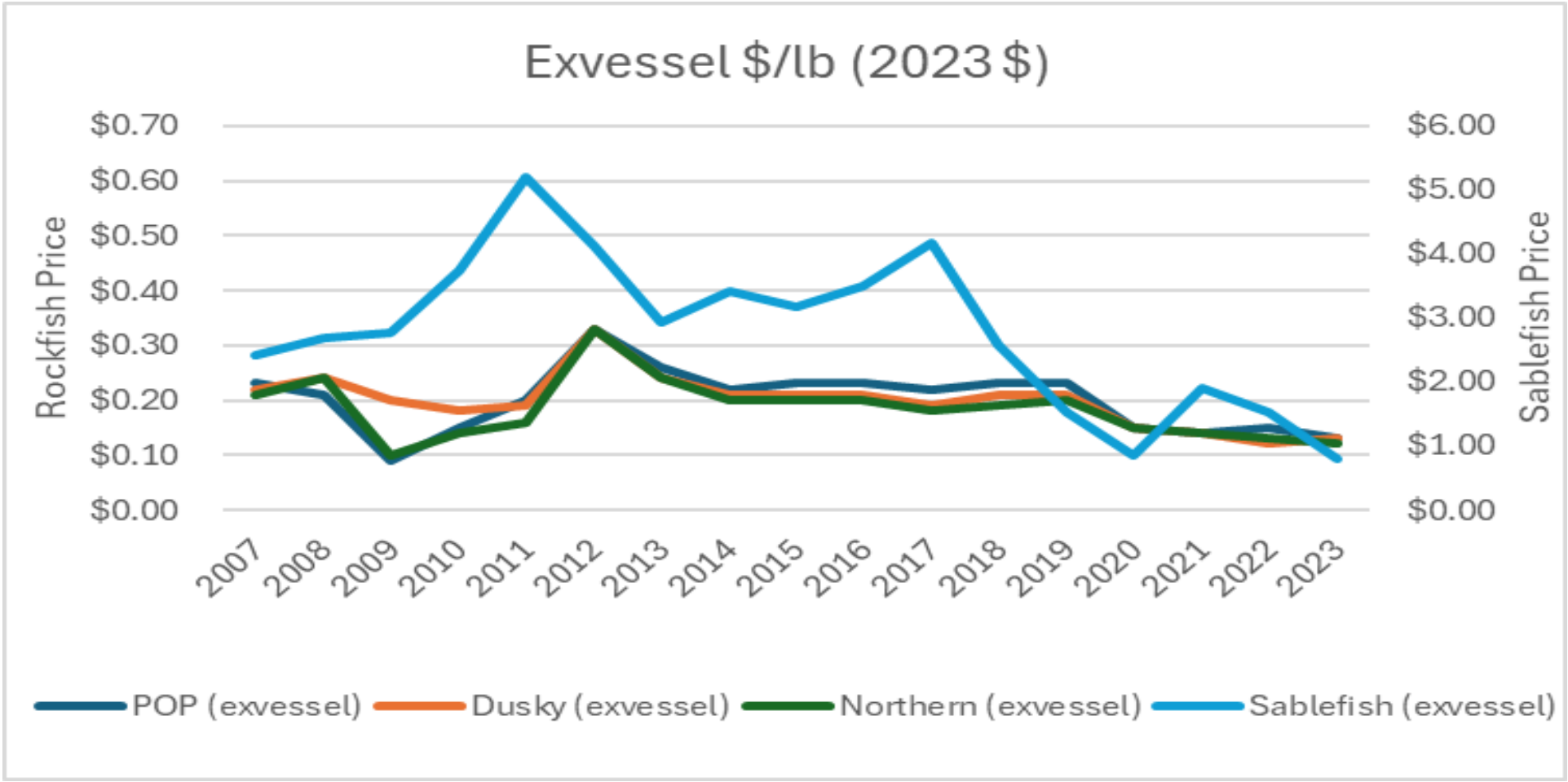
Program Objective: Safety

- Section 14 provides an update on vessel safety.
- Based on vessel name, casualty date, and casualty location in the NIOSH database, it was determined that there were no work-related crewmember fatalities or vessel disasters among vessels when actively participating in the Central GOA rockfish fishery during the pre-RPP, RPP, or the RP.
- A potential reason for the good record of safety of human life at sea could include the extended fishing season that would reduce race-for-fish conditions and allow captains to choose when to operate in the event of inclement weather or crewmember fatigue.

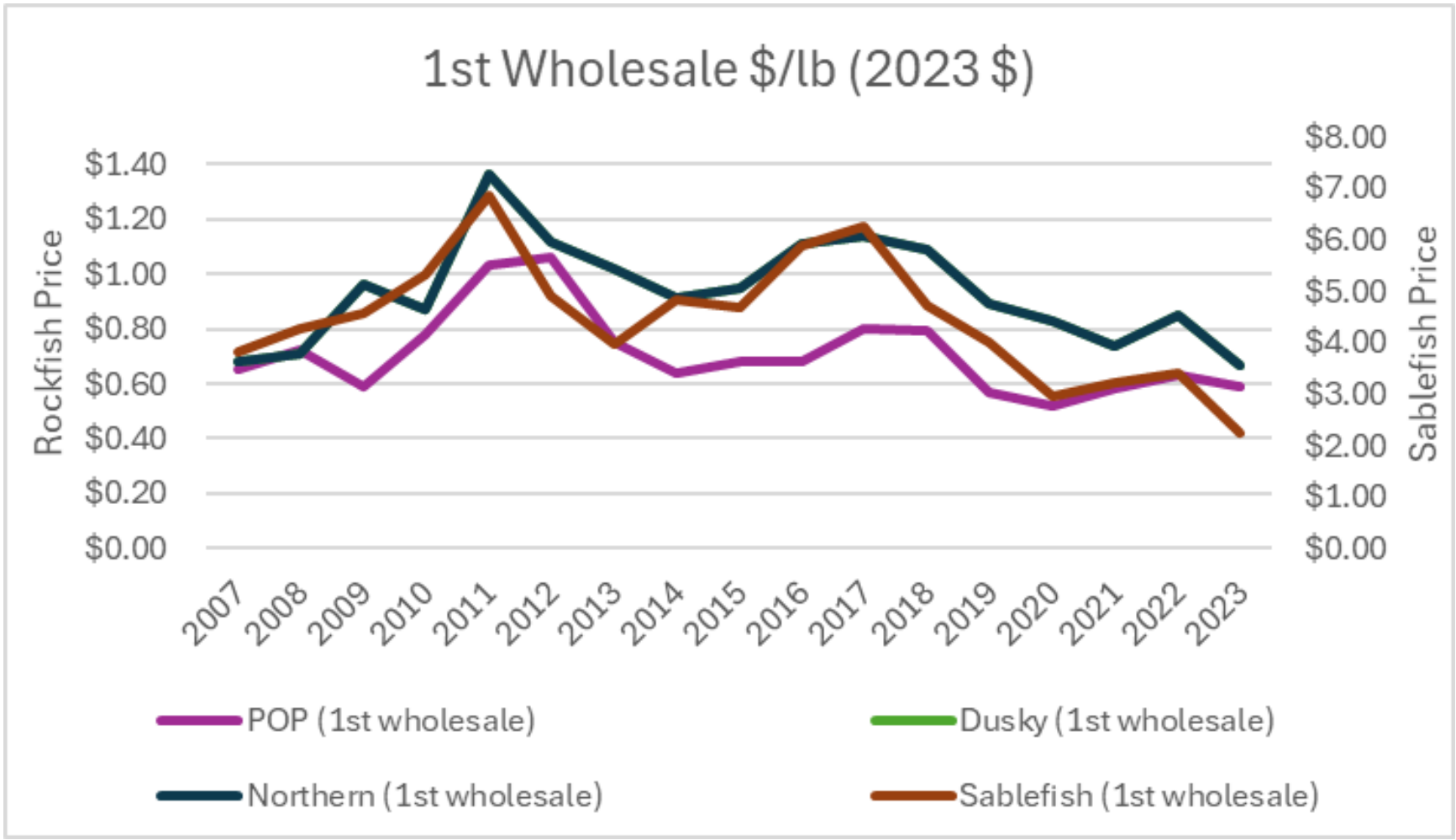
Program Objective: Improve Economic Performance



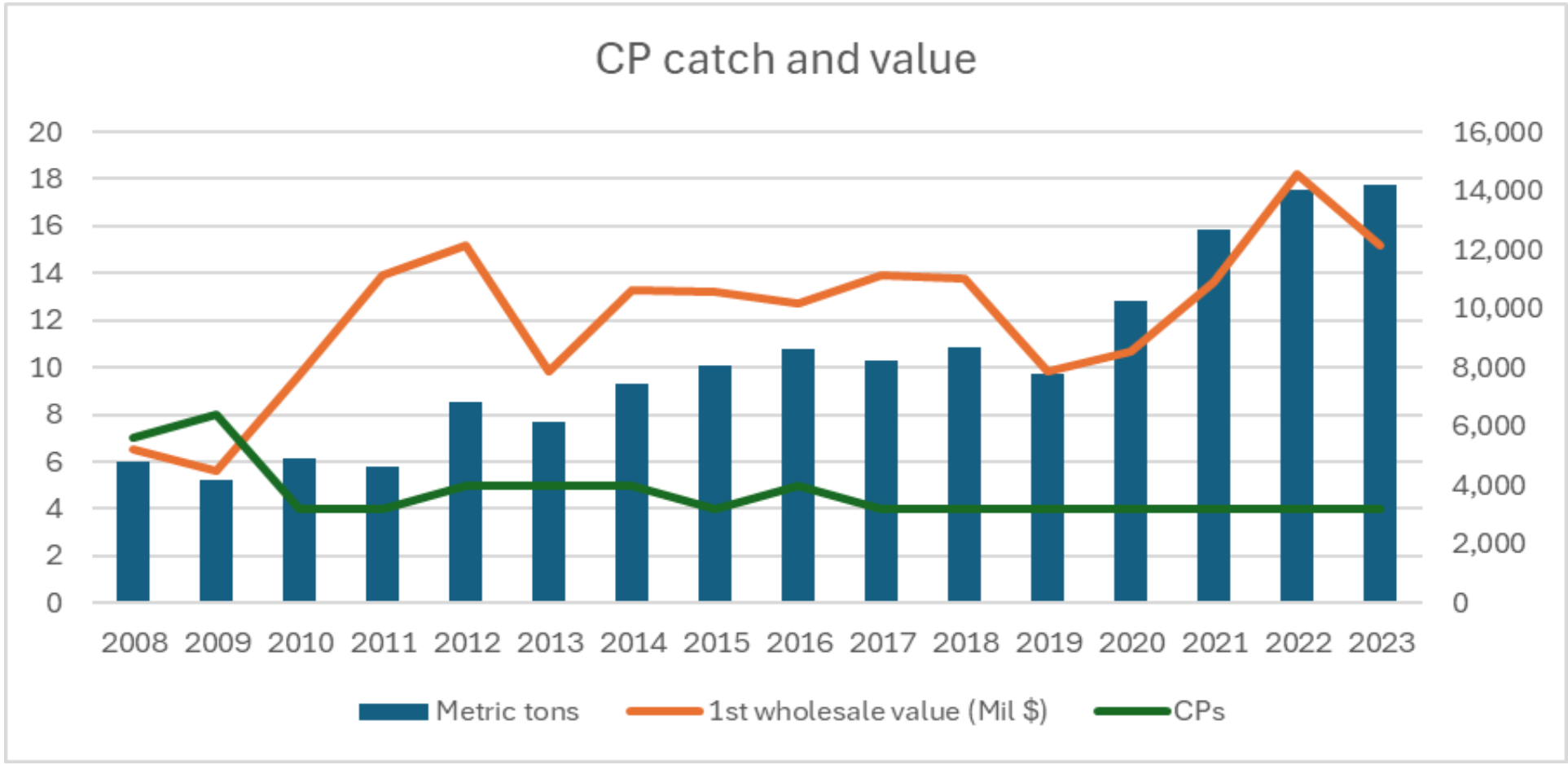
Program Objective: Improve Economic Performance



Program Objective: Improve Economic Performance



Program Objective: Improve Economic Performance



Program Objective: Improve Economic Performance

Why has the economic performance of the RP not met expectations in recent years? The answer goes well beyond the structure of the RP. NOAA Fisheries snapshot of Alaska's seafood industry shows that in recent years the Alaska seafood industry suffered a $1.8 billion loss (2022-2023) and a 50 percent decline in profitability (2021-2023). However, rockfish fisheries have performed better than other fisheries, and harvesters and processors are more reliant on the fishery.

Key findings in that report that apply to the GOA rockfish fisheries are listed below.

- Higher wages, energy prices, and interest rates increased costs of operation.
- Ex-vessel and first wholesale prices decreased for every major species group including rockfish (see Section 7).

https://www.fisheries.noaa.gov/resource/outreach-materials/alaska-seafood-snapshot

Program Objective: Improve Economic Performance

- After the COVID pandemic, retail operational strategies and consumer seafood purchases changed. These changes include how retailers handle/maintain seasonal seafood product inventories, as noted in the following quotes from the report.
    - *Historically, retailers would lower prices to clear inventory. However, strong retail demand for seafood during the pandemic as individuals ate at home was followed by a dramatic decline in that demand as restaurants and schools opened up. This meant that retailers were saddled with high-priced inventory and lower demand.*
    - *Retailers transitioned to keeping supply lower by slowly moving inventory out of cold storage. This practice lowered the seafood supply in the market and kept prices higher, allowing retailers to stay afloat. But it also meant seafood producers, processors, and wholesalers in Alaska demanded a lower quantity of seafood. Retail seafood prices have softened somewhat in 2024, but not by enough to entice consumers to purchase the volumes they bought in 2020–2021.*

Program Objective: Improve Economic Performance

- International competition increased, and other countries often have lower labor and operating costs due to lower environmental and labor standards.
- Other factors that impacted economic performance are international trade barriers, strengthening U.S. dollar, inflation, declines in seafood processing jobs and plant closures, and lack of revenue insurance for harvesters and processors.
- Groundfish fisheries GOA-wide experienced a decade of ecological and economic challenges. These have led to declining participation and undermined the economic stability and social well-being of fishing communities. The total number of active commercial fishing vessels in the GOA declined by 20 percent and the number of processors by 7 percent.

Program Objective: Address the social and economic concerns of communities

- Section 13.1 Regulatory Context (pg 88)
  - MSA National Standards 8 and 4
  - Social and Economic Analysis under NEPA
  - Tribal Consultation and Collaboration

Program Objective: Address the social and economic concerns of communities

- Section 13.2 Social and Community Impacts of the Central GOA RPP and RP as Identified in Previous Program Reviews (pg 88)
  - Transfers of QS from CP to CV sector benefitted Kodiak-based CV cooperatives.
  - Some Kodiak shoreside processors benefitted from history in the fishery, other from participation in the trawl entry level fishery, and the community benefitted from virtually all Central GOA shoreside processing remaining in Kodiak.

Program Objective: Address the social and economic concerns of communities

- Section 13.2 Social and Community Impacts of the Central GOA RPP and RP as Identified in Previous Program Reviews (cont.)
  - Temporal redistribution of rockfish landings had operational benefits for Kodiak shoreside processors, Kodiak-based CVs and their crews, and Kodiak fishery support service providers.
  - The transfer of quota from the CP to the CV sector benefitted Kodiak through increased local vessel activity and deliveries to locally operating shoreside processors.

Program Objective: Address the social and economic concerns of communities

- Section 13.2 Social and Community Impacts of the Central GOA RPP and RP as Identified in Previous Program Reviews (cont.)
  - Non-severability of QS from LLP licenses limited consolidation.
  - Ownership and use caps limited CV consolidation.
  - Change in qualifying years between the RPP and RP program essentially locked in benefits to Kodiak that accrued from the one-way transfers of QS from the CP to the CV sector during the RPP.

Program Objective: Address the social and economic concerns of communities

- Section 13.3 Quantitative Indicators of Community Fishery Engagement and Dependence (pg 93)
  - Kodiak % increase in local address RP CV ownership (over half).
  - Kodiak % increase in CV gross RP ex-vessel revenue (over half).
  - Kodiak % increase in CV dependency on rockfish revenue (both for rockfish CVs and entire Kodiak CV community fleet).
  - In each of the revenue categories, percentages increased, but absolute numbers decreased, which indicates revenues from other fisheries were decreasing at a greater rate.

Program Objective: Address the social and economic concerns of communities

- Section 13.3 Quantitative Indicators of Community Fishery Engagement and Dependence (cont.)
  - RP QS holdings increased in Alaska due primarily to Kodiak gains.
  - Kodiak has gained LLP licenses with rockfish QS.
  - GOA trawl captain and crew EDR data are no longer available.
  - Number of RP CPs has declined over time but have remained stable in number (4) and ownership location since last review.

Program Objective: Address the social and economic concerns of communities

- Section 13.3 Quantitative Indicators of Community Fishery Engagement and Dependence (cont.)
  - Number of engaged shoreside processors accepting RP deliveries declined since last review but remained at four in 2020-2024.
  - Rockfish longline entry level fishery
    - Exclusively jig gear since RP implementation
    - Exclusively Kodiak CVs in 5 of 6 years since last review
    - Limited to 1 or 2 CVs in 2020-2024
    - Catch exclusively processed in Kodiak in 2021-2024

Program Objective: Address the social and economic concerns of communities

- Section 13.4 Community and Social Outcomes of the RP
  - Multiple beneficial impacts for Kodiak across trawl CV, shoreside processor, and support service sectors.
  - Rockfish are a relatively modest portion of CV and processor portfolios, but operational efficiency gains have been important.
  - Both harvesters are processors have been adversely impacted by fishery conditions external to the RP.
  - The RP has been relatively stable and represents a success story in otherwise challenging times.

Program Objective: Address the social and economic concerns of communities

- Section 13.4 Community and Social Outcomes of the RP (cont.)
  - There has been considerable consolidation of shoreside processing ownership in Kodiak in recent years as described in the analysis, with another ownership change occurring since the posting of the draft RP program review.
  - Only one shoreside processor and its affiliated CV cooperative has been continuously engaged in the RP every year, from 2012-2024 and, as of March 31, 2025, has not been on either end of a local consolidation transaction.

Program Objective: Address the social and economic concerns of communities

- Section 13.4 Community and Social Outcomes of the RP (cont.)
  - Processing caps, which are applied at the physical plant level, not at the ownership interest level, were increased under Amendment 113, which became effective September 2024.
  - While the fixed gear entry level fishery has consolidated into Kodiak, levels of participation have been very low in recent years. It is not possible, however, to determine the cause(s) of the decline in participation with existing data.

Program Objective: Address the social and economic concerns of communities

- Section 13.4 Community and Social Outcomes of the RP (cont.)
  - The Seattle MSA remains substantially engaged in the RP fishery, have increased QS ownership in all three primary rockfish species, and remains the center of gravity for the CP component of the fishery and for large-scale support service providers.
  - Newport and Lincoln County Oregon remains substantially engaged in the CV sector of the RP fishery and have increased QS ownership in all three primary rockfish species.

National Standards Summary

- NS 1 Optimum Yield: of the primary rockfish species, over 90% of the POP TACs were harvested most years until 2023. In 2023 it was less than 90% and in 2024 was less than 80% was harvested. Less than 60% of the CGOA Northern and dusky TACs have been harvested since 2020.

National Standards Summary

NS 2 Scientific Information: The best scientific information is collected and used to manage the RP fisheries. Scientific information is collected through fishtickets, logbooks, surveys, the observer program, and collaborative efforts with industry.

National Standards Summary

NS 3 To the extent practicable, an individual stock of fish shall be managed as a unit throughout its range, and interrelated stocks of fish shall be managed as a unit or in close coordination. The management of stocks allocated under the RP meets these criteria (see GOA SAFE document).

National Standards Summary

NS 4 Allocations: QS were allocated for three primary fisheries based on the historic participation of harvesters without discriminating between residents of different states. Allocations were determined by the Council and SOC to be fair and equitable, reasonably calculated to promote conservation, and included ownership and use caps to ensure that no individual, corporation, or other entity acquires an excessive share.

National Standards Summary

NS 5 Efficiency: While efficiency was not the sole purpose of the program, it has allowed harvesters and processors to scale annual production capacity to better align with the available TAC and consumer demand. That ability has been important in recent years when economic conditions have been poor and demand for production relatively weak.

National Standards Summary

NS 6 Variations and Contingencies: This NS addresses changes and how they are addressed based on conditions that arise from biological, social, and economic occurrences, as well as from fishing practices. Section 2 describes all the amendments that have been made since the RPP was implemented. That section highlights changes that have been made when circumstances in the fishery change substantially, or when a different management philosophy and objectives are defined.

National Standards Summary

NS 7 Costs and Benefits: Current fishery and market conditions have resulted in difficult economic times for harvesters, processors, crew, and communities that rely on the RP fisheries. A formal cost benefit analysis was not undertaken, but the RP has benefited harvesters and processors by providing stakeholders the ability to scale production inputs to current conditions. However, many of the current economic conditions are factors outside the control of the program (see Section 8.3).

National Standards Summary

NS 8: This NS specifies that conservation and management measures shall, consistent with the conservation requirements of the MSA, take into account the importance of fishery resources to fishing communities [i.e., those communities substantially engaged in or substantially dependent upon the relevant fisheries] to provide for the sustained participation of such communities and, to the extent practicable, minimize adverse economic impacts to such communities.

No issues associated with the RP were identified that would put the sustained participation of any Central GOA rockfish trawl or longline fishing communities at risk.

National Standards Summary

NS 9 Bycatch: Requires that programs minimize bycatch and, to the extent bycatch cannot be avoided, minimize the mortality of such bycatch. Section 6 describes PSC usage, and Section 9 describes the retention and utilization of groundfish species managed under the program. PSC usage has decreased under the program in terms of numbers and rates. Retention of the primary rockfish species is near 100%.

National Standards Summary

NS 10 Safety of Life at Sea: There have been no fatalities in the RPP or RP. Extended fishing seasons to avoid bad weather and reduce crew fatigue are two potential reasons for the good safety record (see Section 14)

Acknowledgements

Thank you to the authors who drafted sections for this review.

Mike Downs

Joel Kraski

Also, thanks to the people who provided information for this report to improve the quality of the review.