

D3 IFQ/CQE ADJUSTMENTS

Expanded discussion paper

OCTOBER 2026

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2026



NORTH PACIFIC
FISHERY MANAGEMENT COUNCIL



History of Action

- Pacific Halibut and Sablefish IFQ Program review → [December 2024](#)
- IFQ/ CQE Transfer, Beneficiary Changes discussion paper → [October 2025](#)
- **IFQ/CQE Adjustments expanded discussion paper** → [October 2026](#)



List of proposed items

Transfer Eligibility Certificate (TEC) requirements (from last paper)

1. Allow time tendering in any federal or state commercial fishery off Alaska to count toward the 150-day TEC requirement to receive annual IFQ
2. Replace the existing NMFS interim policy with a regulation to establish a minimum age to be eligible to receive IFQ or QS by transfer (e.g., 12, 16, 18)
3. Consider waiving the TEC requirement for individuals fishing annual IFQ derived from CQE-held quota share



List of proposed items

Community Quota Entity (CQE) Operations (new or updated)

4. Ability of CQE to assign and manage quota in-season (e.g., explore processes similar to CDQ permitting for halibut or hired masters permits)
5. Potential to increase or remove the 50,000 lb sablefish vessel use cap for the Aleutian Islands CQE Program
6. Potential to increase the amount of quota an individual Gulf of Alaska CQE can hold. (No change to the overall cap for the entire program: 21% of the total halibut QS and 21% of the total sablefish QS in each IFQ regulatory area in which CQEs are eligible to hold QS)
7. Background and clarification on whether current regulations allow CQEs in the Gulf of Alaska and the Aleutian Islands to hold federal processing permits



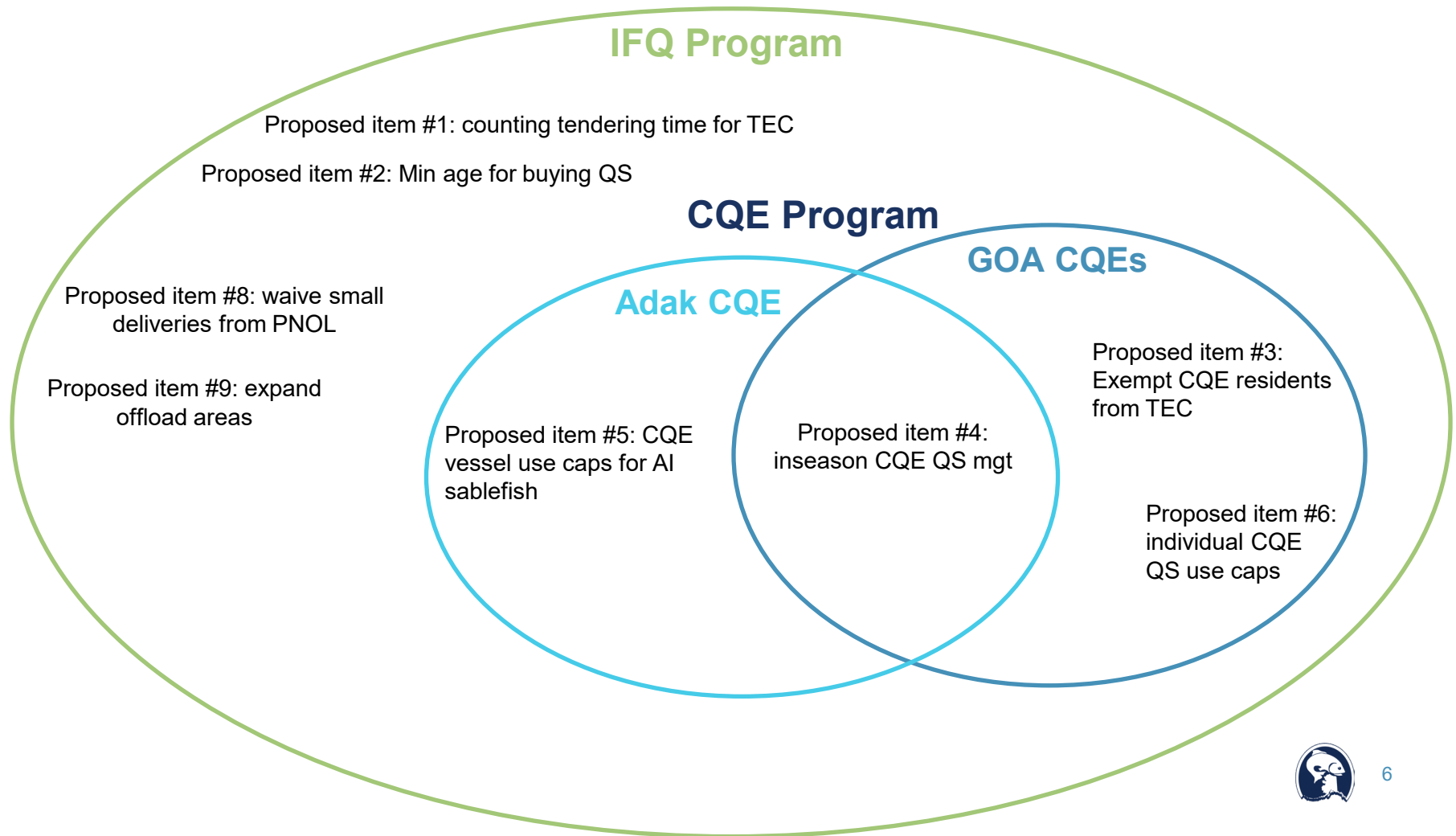
List of proposed items

Unload/ Landing Issues (new)

8. Potential to waive the prior notice of landing requirement and restricted unload hours for small IFQ/CQE deliveries (*e.g.*, $\leq 2,000$ lb)
9. Expansion of the designated unload areas for tenders receiving IFQ or CQE halibut or sablefish



Scope of proposed actions



Background – IFQ Program and TEC

Pacific Halibut and Sablefish Individual Fishing Quota (IFQ) Program

- Fixed gear halibut and sablefish commercial fisheries off Alaska (1995)
- Quota share (QS) for a species and regulatory area
- Fishable IFQ pounds based on the total allowable catch for that species
- In order to receive QS or IFQ by transfer, a person must be issued a **Transfer Eligibility Certificate (TEC)**
- Eligibility requirements (e.g., 150 or more days of experience working as part of a harvesting crew in any U.S. commercial fishery) and submitting an application attesting to this eligibility
- “Harvesting” - work directly related to the catching and retaining of fish
- Supports the IFQ Program’s goals of maintaining owner-operated fisheries



Background – CQE Program

Table 1 CQE QS holdings, 2026

CQE	CQE Community	Area and species	QS units	2026 IFQ pounds	% of Area QS pool
Hoonah Community Fisheries Corporation	Hoonah	2C halibut	241,795	11,449	0.41%
Southeast Village Fisheries Collective	Kassan	2C halibut	191,361	9,061	0.32%
Thorne Bay Fisheries Association	Thorne Bay	2C halibut	28,287	1,339	0.05%
Southeast Village Fisheries Collective	Yakutat	3A halibut	217,338	7,012	0.12%
Ouzinkie Community Holding Corp	Ouzinkie	3A halibut	841,465	27,147	0.46%
Port Lions Fisheries, Inc.	Port Lions	3A halibut	328,404	10,595	0.18%
Cape Barnabas, Inc.	Old Harbor	3A halibut	261,540	8,438	0.14%
		3B halibut	162,299	7,426	0.30%
Perryville CQE, Inc.	Perryville	3B halibut	148,710	6,804	0.27%
Adak Community Development Corporation	Adak	4B halibut	1,369,350	108,548	14.75%
		AI sablefish	2,184,805	673,346	6.84%



Item #1. Include tendering time in TEC eligibility

Covered in the last discussion paper.



Item #1: Include tendering time in TEC eligibility

PROPOSAL

- Allowing tendering to count toward TEC sea days
- Discussed as a result of the IFQ Program Review
- At the time, tendering was also being considered in the Crab Rationalization Program as a demonstration of active participation

REGULATIONS AND PRELIMINARY ASSESSMENT

- To be eligible for a TEC in the IFQ fishery, persons must have 150 or more days of experience working as part of a harvesting crew in any U.S. commercial fishery.
- Tendering includes transporting unprocessed fish or shellfish from a fishing vessel to a processor (*i.e.*, does not harvest, does not process). Thus, currently does not qualify for TEC sea days.
- Participation occurs off Alaska (see Table 3) and elsewhere in the U.S.
- Inclusion of tendering crew experience would expand the pool of people eligible to buy QS.



Item #1: Include tendering time in TEC eligibility

Table 5 Scope of tendering and harvest activity that applies under existing and proposed regulations for retention and transfer of QS

Program	Type of QS/ objective	Qualified harvesting scope	Qualified tendering scope
Crab Rationalization Program	To receive crab owner shares by transfer	Any U.S. commercial fishery	None
	To receive crab C shares by transfer	Any U.S. commercial fishery	Recommended in Dec 2025 <i>Yes, Any U.S. commercial fishery</i>
	Retention and issuance of crab C shares	Off of Alaska	Yes, Off of Alaska
IFQ Program	To receive halibut or sablefish QS by transfer	Any U.S. commercial fishery	Proposed: Yes, Off of Alaska

Note: Differences across scope will exist regardless of the proposed item for IFQ; however, if moved forward, the Council may wish to align the scope with the qualifying harvesting scope for the IFQ TEC (*i.e., in any U.S. commercial fishery rather than exclusively tendering activity outside of Alaskan waters*)



Item #2. Minimum age for purchasing QS

Covered in the last discussion paper.



Item #2. Minimum age for purchasing QS

PROPOSAL

- NMFS Restricted Access Management (RAM) has received TECs from very young fishermen
- In 2022, NMFS AKR established an interim policy that set the minimum age for the issuance of an IFQ TEC at 18 years old.
- During the IFQ Program review there was discussion about whether to establish a minimum age in regulations.
- Public testimony highlighted disparate views on if setting an age was necessary, and if so, what age was appropriate for QS ownership.

REGULATIONS AND PRELIMINARY ASSESSMENT

- NMFS prefers consistency and clear regulations to promote compliance and enforceability
- Section 3.2 includes a list of responsibilities for QS/ IFQ holders
- In the event of a violation, minors would be exposed to potential liability for civil penalties and permit sanctions
- Age requirements vary between state and Federal labor laws (Table 6)
- NMFS recommends initiating an action to establish a minimum age in regulation



Item #3. Waiving TEC requirements for CQE residents

Covered in the last discussion paper.



Item #3. Waiving TEC requirements for CQE residents

PROPOSAL

- Testimony during the IFQ Program Review – opportunity for CQE residents with less harvesting experience.
- The proposal would waive the TEC requirements (i.e., 150 sea-days), specifically for individuals harvesting IFQ from CQE-held QS.

REGULATIONS AND PRELIMINARY ASSESSMENT

- Eligible residents **lease** IFQ from the CQE. Currently must have a TEC as the IFQ permit will be issued in their name.
- Residents of Adak are an exception. No TEC requirements to lease IFQ from Adak CQE.
- Low prosecution rates for CQEs (Table 2) and this action may expand the pool of community residents eligible to receive IFQ from CQE, providing additional opportunity for residents in line with CQE Program goals.
- There would be joint considerations with this proposal and others (i.e., proposed item #1 and proposed item #4)



Item #4. Allow CQE to assign and manage quota in-season



Item #4. Allow CQE to assign and manage quota in-season

PROPOSAL

- Challenges for internal management of the CQE's QS was a topic of concern highlighted in the IFQ Program Review and subsequent public testimony in October 2025
- The inability for CQE group managers to view IFQ landings associated with the CQE or to conduct an efficient 'return transfer' of the IFQ in the event that it is not fished by one resident may contribute to low prosecution rates.
- Motion: Ability of CQE to assign and manage quota in-season (e.g., explore processes similar to CDQ permitting for halibut or hired masters permits)



Item #4. Allow CQE to assign and manage quota in-season

REGULATIONS - Current process

- CQEs can lease/transfer IFQ to residents annually
- If lessee is unable to harvest IFQ, no specific process or criteria to return IFQ to CQE
- Direct transfer between CQE residents are considered a sublease, which is not allowed
- IFQ system not designed to track or process transactions for the purpose of returning IFQ to the QS holder after temporary transfer
 - NMFS evaluates requests for the return of transferred IFQ on a case-by-case basis
 - List of criteria it currently uses before approving a return-transfer
 - Manual backend return process requiring case specific programming
- NMFS is in the process of re-designing the IFQ permits application as part of a larger project to design an integrated fisheries application (IFA) that is adaptive and supports the needs of all system stakeholders.



Item #4. Allow CQE to assign and manage quota in-season

REGULATIONS - IFQ hired masters (*i.e.*, hired skippers)

- Another way (besides leasing) that someone other than the QS holder may harvest halibut and sablefish IFQ
- IFQ holder completes an application that lists the individual(s) that will be harvesting their IFQ. That individual must carry their hired skipper master permit onboard with them.
- IFQ hired masters privileges only granted under specific circumstances
 - A Class QS holders
 - For catcher vessel QS: only initial issueses outside of Area 2C and Southeast outside district, with 20% ownership in vessel, and for QS acquired before Feb 12, 2010
- Intended to permit business structures that existed prior to the IFQ Program, but the Council has amendment provisions to limit further use of hired skippers.
- May look similar to leasing in practice but does not require IFQ to transfer through NMFS. QS holder remains liable.



Item #4. Allow CQE to assign and manage quota in-season

REGULATIONS - CDQ hired masters

The CDQ Program was established by Congressional action to build local economies and alleviate rural poverty in Western Alaska.

- Annually, a proportion of BSAI TACs and PSC limits are granted to 6 regional non-profit corporations who manage their own quota directly.
- CDQ managers **must** submit hired masters applications for all individuals eligible to harvest
- same application as for IFQ hired masters **except** no demonstration of vessel ownership
- not an official transfer of quota (similar to IFQ hired master)
- CDQ managers directly self-manage in-season distribution of quota harvesting across vessels and ensure they do not exceed groups' quota

Revised: 01/23/2008

OMB Control No.: 0648-0272
Expiration Date: 04/08/2008

	APPLICATION FOR IFQ/CDQ HIRED MASTER PERMIT	U.S. Dept. of Commerce/NOAA National Marine Fisheries Service (NMFS) Restricted Access Management Program (RAM) P.O. Box 21668 Juneau, AK 99802-1668 (800) 304-4846 toll free / 586-7202 in Juneau (907) 586-7354 fax	

BLOCK A -- PURPOSE OF APPLICATION	
Add Permit Holder [☐]	Delete Permit Holder [☐]
Indicate permit(s) to which this action applies:	
Sablefish Permit Number _____ Category A B C D	Halibut Permit Number _____ Category A B C D

BLOCK B -- PERMIT HOLDER INFORMATION		
1. Name of IFQ Permit Holder:		2. NMFS Person ID:
3. Business Mailing Address: Permanent [☐] Temporary [☐]		
4. Business Telephone No.:	5. Business Fax No.:	6. E-mail address (if available):



Item #4. Allow CQE to assign and manage quota in-season

PRELIMINARY ASSESSMENT

- Over 750,000 lb of CQE QS went unfished in 2025
- Out of alignment with CQE program goals
- Makes it difficult to service debt from QS purchase
- An easier internal management system may encourage prosecution

Table 2 CQE aggregated landings of halibut and sablefish IFQ, 2018-2025

Year	Count of CQEs with QS	Fishable lb of halibut held by CQEs	Fishable lb of sablefish held by CQEs	Count of active CQEs	CQE lb landed (both species)	% landed of fishable lb (both species)	Count of vessels landing CQE
2018	4	96,081	19,839	4	98,111	85%	15
2019	5	162,050	20,255	5	45,096	25%	16
2020	5	160,018	20,549	4	32,900	18%	13
2021	5	199,413	45,156	3	50,629	21%	15
2022	6	244,365	424,855	5	99,176	15%	14
2023	7	256,190	655,162	5	81,202	9%	15
2024	7	224,312	669,414	5	88,040	10%	16
2025	7	181,841	633,362	5	52,982	6%	15



Item #4. Allow CQE to assign and manage quota in-season

PRELIMINARY ASSESSMENT

Two approaches for improving internal CQE QS management: primary distinction is in the liability and control of the IFQ

Allow hired master privileges to be used for IFQ-derived from CQEs

- Substantial regulatory changes from 'leasing' IFQ structure
- Similar to the current process for hired masters
- IFQ would remain in the name of the CQE
- No TEC or transfer process through RAM
- Policy consideration: CQE goals vs Council's continued amendments to reduce use of hired skippers

Direct functions within the Integrated Fisheries Application (IFA)

- Could possibly provide for self-managed return transfer by CQE group manager
- May still require regulatory changes to dictate the scope
- Would still constitute a lease of IFQ and require transfer through the eFISH system



Item #5. Increase or remove the 50,000 lb sablefish vessel use cap for the Aleutian Islands CQE Program



Item #5. Increase or remove the 50,000 lb sablefish vessel use cap for the AI CQE Program

PROPOSAL

- Testimony in October 2025 proposed to increase or remove the 50,000 lb vessel use cap specifically for CQE-derived sablefish IFQ for the Aleutian Islands CQE.
- It was stated that this cap is a barrier to full harvest of the CQE's sablefish IFQ, as current holdings would require 13 unique vessels to fully harvest this CQE group's full sablefish QS.

REGULATIONS

- CQE regulations limit a vessel to harvesting no more than 50,000 lb of IFQ sablefish derived from a CQE's QS
 - Applies to all CQEs
 - Similar limit for halibut IFQ derived from QS held by a CQE
 - Objective is to ensure broad distribution of CQE benefits among vessel owners
- General vessel use caps (i.e., 1% of all sablefish IFQ TAC; see Table 8) also applies, but is usually much higher (e.g., 602,716 lb in 2026)
 - There is also a 50,000 lb limit on the amount of IFQ an individual may receive from a CQE that would remain in place.



Item #4. Increase or remove the 50,000 lb sablefish vessel use cap for the AI CQE Program

PRELIMINARY ASSESSMENT

- Adak CQE (Adak Community Development Corp; ACDC) has been successful in acquiring QS
- Challenges in full prosecution of the IFQ
- 0-3 active vessels each year; have not been near the 50k lb cap
- Proposed action *could* provide new partnership opportunities
- There are likely a number of other factors that will continue to challenge the prosecution of the IFQ (e.g., only 1.7% of the AI sablefish TAC was harvested in 2025)

Table 9 ACDC sablefish QS holdings and relative pounds, 2018-2026

Year	QS units	IFQ pounds	Aleutian Islands TAC	% of AI TAC	Min number of vessels to harvest
2018	720,570	59,349	2,630,088	2.3%	1.19
2019	720,570	59,946	2,656,543	2.3%	1.20
2020	720,570	60,841	2,696,226	2.3%	1.22
2021	1,133,232	221,412	6,239,018	3.5%	4.43
2022	1,976,539	529,194	8,549,439	6.2%	10.58
2023	1,976,539	691,025	11,164,094	6.2%	13.82
2024	1,976,539	691,025	11,164,094	6.2%	13.82
2025	1,976,539	650,092	10,502,714	6.2%	13.00
2026	2,184,805	673,346	9,841,334	6.8%	13.47

Corrected column 4



Item #4. Increase or remove the 50,000 lb sablefish vessel use cap for the AI CQE Program

PRELIMINARY ASSESSMENT

- This proposal highlights policy trade-offs between the original objectives of ensuring broad distribution of benefits and ensuring the QS has an opportunity to be fished.
- This type of policy trade-off has been considered before. For example:
 - The accounting of this CQE-specific vessel use cap (*i.e.*, previously included both CQE and non-CQE IFQ)
 - Adak temporary exemption from residency requirement
 - Area 4 halibut vessels caps action
- Proposed action is specific to the Adak CQE and to sablefish; if the Council moves forward identify the specific rationale around this scope (*i.e.*, excludes halibut, excludes GOA CQEs)



Item #6. Increase the amount of QS a GOA CQE can hold



Item #6. Increase the amount of QS a GOA CQE can hold

PROPOSAL

- In October 2025, the Council received public comment proposing to eliminate the individual CQE purchase limitation.
- Testimony described that community long-term planning and funding opportunities may be impacted by these limits.
- Motion: the use cap established for all CQEs would remain in place at 21% of the total halibut and sablefish IFQ in each regulatory area, but the total halibut and sablefish QS a GOA CQE group is eligible to hold would increase.



Item #6. Increase the amount of QS a GOA CQE can hold

REGULATIONS

- CQE use caps are the same as use caps for other QS holders
- Cumulative use caps, restrict groups in aggregate from holding a maximum of 21% of the total QS in each regulatory area for each species (Table 11)

Table 10 QS use caps for persons and GOA CQE communities

Species	Use caps basis	QS use cap	2026 IFQ lb equivalent
Halibut	1% of the 2C QS pool	599,799 units	28,400 lb
	0.5% of 2C, 3A and 3B QS pool	1,502,823 units	48,484 lb if all 3A quota, 68,762 lb if all 3B quota*
Sablefish	1% of SE QS pool	688,485 units	128,317
	1% of all sablefish QS pool	3,229,721 units	494,204 lb if all CG quota, 741,085 lb if all WG quota, 299,425 lb if all WY quota*



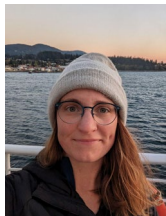
Item #6. Increase the amount of QS a GOA CQE can hold

PRELIMINARY ASSESSMENT

- No GOA CQE group is currently close to the individual group caps (Table 1)
- However, as highlighted in testimony the limits may affect long-term planning, funding opportunities, and could be a constraint in the future.
- The caps were intended to balance CQE opportunity with possible impacts to other QS new entrants and QS markets
- Proposed action may have no impact, or may allow one or more groups to transfer over the caps
- Further analysis may consider broader QS market impacts
 - Recent restrictions on medical lease transfers may result in more QS on the market
 - Recent implementation of the charter halibut stamp as funding for Recreational Quota Entity may generate more competition



Item #7. Clarification on whether current regulations allow CQEs in the GOA to hold federal processing permits



Item #7. Federal Processing Permits (FPP) in the GOA and AI

REQUEST

- October 2025 testimony requested FPP allowances for CQEs in the Gulf of Alaska be expanded to CQEs in the Aleutian Islands.

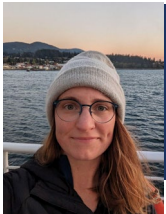
CLARIFICATION

NMFS was not able to attend the October 2025 meeting to provide an answer on this issue.

- CQEs in the GOA and AI may apply for and hold FPPs.
- Regulations at 50 CFR 679.4(f)(2)
- <https://www.fisheries.noaa.gov/permit/alaska-federal-fisheries-permit-and-federal-processor-permit-applications>



Item #8. Waive the prior notice of landing requirement and restricted unload hours for small IFQ deliveries



Item #8. PNOL exemption and unloading hours

PROPOSAL FOR ACTION

“Potential to waive the prior notice of landing requirement and restricted unload hours for small IFQ/CQE deliveries (e.g., $\leq 2,000$ lb).”

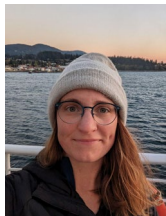
- October 2025 Motion

- Testimony re: difficulty with PNOL submission time requirements (particularly for smaller vessels, lower operational efficiency)
 - remote areas w/out cell coverage to call OLE
 - OLE operational hours preclude faster turnaround to return to fishing grounds



Item #8. PNOL exemption and unloading hours

PNOLs are used to notify OLE in order to travel to meet deliveries of IFQ/CDQ halibut and IFQ sablefish.



Item #8. PNOL exemption and unloading hours

PNOLs are used to notify OLE in order to travel to meet deliveries of IFQ/CDQ halibut and IFQ sablefish.

Prior Notice of Landing (PNOL) - 50 CFR 679.5(l)(1)

- submit at least 3 hours prior to landings of IFQ halibut, CDQ halibut, or IFQ sablefish by calling OLE during operational hours (6am to midnight)



Item #8. PNOL exemption and unloading hours

PNOLs are used to notify OLE in order to travel to meet deliveries of IFQ/CDQ halibut and IFQ sablefish.

Prior Notice of Landing (PNOL) - 50 CFR 679.5(l)(1)

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****Not in Discussion Paper****

Unloading Hours - 50 CFR 679.5(e)(7)(iii)(A)

- landings of IFQ halibut, CDQ halibut, or IFQ sablefish may commence only between **6am and 6pm**, unless given permission to land at a different time is granted in advance by OLE

OLE reviews PNOLs on a case-by-case basis.

→ At the time a PNOL is submitted, vessels may ask OLE for permission to unload later than 6pm.



Item #8. PNOL exemption and unloading hours

Existing PNOL waivers – 50 CFR 679.5(l)(1)(iv)

- $\leq$ 500 lb IFQ halibut landed concurrent to either:
salmon troll or lingcod dinglebar.
- Adopted to facilitate compliance with regulations requiring IFQ holders to retain halibut (50 CFR 679.7(f)(11)) caught incidental to State-managed fisheries.
- 500 lb threshold selected to be sufficiently large to cover the typical amount of halibut caught incidental to these fisheries, but not so large as to jeopardize effective monitoring.
(61 FR 41523, August 9, 1996 ; 66 FR 27908, May 21, 2001)
- Registered Buyer landings report* still required, per 50 CFR 679.5(e)(7).

*Also referred to as “IFQ/CDQ Landings Report”

<https://www.fisheries.noaa.gov/permit/alaska-ifq-halibut-sablefish-and-cdq-halibut-program-fishery-applications-and-reporting>



Item #8. PNOL exemption and unloading hours

PNOLs are used for monitoring and enforcement.

- The Council recognized that the issuance of quota could create incentive to underreport halibut landings, and
- recommended requirements (e.g., PNOL) to increase monitoring and enforceability while balancing costs to fishery user groups.

In particular:

- OLE officers, and
- International Pacific Halibut Commission (IPHC) port samplers use PNOLs.
 - $\leq 2,000$ lb exemption would preclude IPHC from collecting “small landings”

“Small landings are defined to be those under 0.9 t (2,000 lb) in Bellingham, Juneau, Petersburg, Sitka and Homer, and under 454 kg (1,000 lb) in all other ports.” - IPHC Sampling Manual, p.15



Item #8. PNOL exemption and unloading hours

PRELIMINARY ASSESSMENT

Predominantly halibut deliveries with PNOL tickets (2021 – 2025)

46 to 50% of trips were $\leq 2,000$ lb

Proportion of halibut PNOL trips with $\leq 2,000$ lb.

Year	Count of trips with PNOL delivering $\leq 2,000$ lb of dominant species	Count of trips with PNOL delivering $> 2,000$ lb of dominant species	Total trips with PNOL delivering dominant species	Proportion of trips with PNOL delivering $\leq 2,000$ lb delivered of dominant species
2021	1,502	1,782	3,284	46%
2022	1,616	1,898	3,514	46%
2023	1,567	1,746	3,313	47%
2024	1,454	1,696	3,150	46%
2025	1,464	1,487	2,951	50%

Proportion of total halibut weight delivered on PNOL trips with $\leq 2,000$ lb.

which represented 6.8 to 11% of total IFQ halibut weight each year

Year	Sum of IFQ lb of dominant species from deliveries $\leq 2,000$ lb	Sum of IFQ lb of dominant species from deliveries $> 2,000$ lb	Total IFQ lb from dominant species	Proportion of IFQ lb delivered from trips $\leq 2,000$ lb
2021	1,099,524	15,055,389	16,154,913	6.8%
2022	1,230,281	15,132,481	16,362,762	7.5%
2023	1,232,583	12,847,380	14,079,963	8.8%
2024	1,186,611	11,824,921	13,011,532	9.1%
2025	1,166,062	9,469,243	10,635,305	11.0%



Item #8. PNOL exemption and unloading hours

PRELIMINARY ASSESSMENT

Predominantly halibut deliveries with PNOL tickets (2021 – 2025)

46 to 50% of trips were $\leq 2,000$ lb

which represented 6.8 to 11% of total IFQ halibut weight each year



Proportion of halibut PNOL trips with $\leq 2,000$ lb.

Year	Count of trips with PNOL delivering $\leq 2,000$ lb of dominant species	Count of trips with PNOL delivering $> 2,000$ lb of dominant species	Total trips with PNOL delivering dominant species	Proportion of trips with PNOL delivering $\leq 2,000$ lb delivered of dominant species
				46%
				46%
				47%
				46%
				50%

Year	Count of trips with PNOL delivering $\leq 2,000$ lb of dominant species	Count of trips with PNOL delivering $> 2,000$ lb of dominant species	Total trips with PNOL delivering dominant species	Proportion of IFQ lb delivered from trips $\leq 2,000$ lb
2021	1,099,524	15,055,389	16,154,913	6.8%
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2023	1,232,583	12,847,380	14,079,963	8.8%
2024	1,186,611	11,824,921	13,011,532	9.1%
2025	1,166,062	9,469,243	10,635,305	11.0%

As halibut TACs and CPUEs declined in recent years, the proportion of PNOL trips and total weight that would be exempted under a 2,000 lb threshold increased.



Item #8. PNOL exemption and unloading hours

PRELIMINARY ASSESSMENT

Predominantly sablefish deliveries with PNOL tickets (2021 – 2025)

4 to 7% of trips were $\leq 2,000$ lb

Proportion of sablefish PNOL trips with $\leq 2,000$ lb.

Year	Count of trips with PNOL delivering $\leq 2,000$ lb of dominant species	Count of trips with PNOL delivering $> 2,000$ lb of dominant species	Total trips with PNOL delivering dominant species	Proportion of trips with PNOL delivering $\leq 2,000$ lb delivered of dominant species
2021	123	1,646	1,769	7%
2022	98	1,829	1,927	5%
2023	87	1,636	1,723	5%
2024	83	1,530	1,613	5%
2025	66	1,508	1,574	4%

Proportion of total sablefish volume delivered on PNOL trips with $\leq 2,000$ lb.

Year	Sum of IFQ lb of dominant species from deliveries $\leq 2,000$ lb	Sum of IFQ lb of dominant species from deliveries $> 2,000$ lb	Total IFQ lb from dominant species	Proportion of IFQ lb delivered from trips $\leq 2,000$ lb
2021	135,934	29,255,789	29,391,723	0.5%
2022	113,129	37,756,590	37,869,719	0.3%
2023	100,125	32,905,349	33,005,474	0.3%
2024	89,583	34,010,528	34,100,111	0.3%
2025	73,249	36,596,967	36,670,216	0.2%

which represented 0.2 to 0.5% of total sablefish volume each year



Item #8. PNOL exemption and unloading hours

PRELIMINARY ASSESSMENT

Predominantly sablefish deliveries with PNOL tickets (2021 – 2025)

4 to 7% of trips were $\leq 2,000$ lb

which represented 0.2 to 0.5% of total sablefish volume each year



Proportion of sablefish PNOL trips with $\leq 2,000$ lb.

Year	Count of trips with PNOL delivering $\leq 2,000$ lb of dominant	Count of trips with PNOL delivering $> 2,000$ lb of dominant	Total trips with PNOL delivering dominant	Proportion of trips with PNOL delivering $\leq 2,000$ lb delivered of dominant species
	Proportion of annual sablefish trips and total volume that would be exempted from under a 2,000 lb threshold decreased, modestly. (Inverse to what we saw with halibut)			7%
				5%
				5%
				5%
				4%
Year	Count of trips with PNOL delivering $\leq 2,000$ lb of dominant	Count of trips with PNOL delivering $> 2,000$ lb of dominant	Total trips with PNOL delivering dominant	Proportion of IFQ lb delivered from trips $\leq 2,000$ lb
2021	113,129	37,756,590	37,869,719	0.5%
2022	100,125	32,905,349	33,005,474	0.3%
2023	89,583	34,010,528	34,100,111	0.3%
2024	73,249	36,596,967	36,670,216	0.2%

Sablefish from Tables 12 + 13, Section 5.1.3, page 31-33



Item #8. PNOL exemption and unloading hours

PRELIMINARY ASSESSMENT

- discussion paper explored 2,000 lb threshold (previous slides)
- potential benefit to smaller vessels (w/ smaller deliveries)

The Council could:

- recommend analyses of other thresholds, closer to the current exemptions (both for 500 lb halibut).
 - Current exemptions are specific to halibut caught incidental to State-managed fisheries.
 - IPHC sampling of “small landings” would be affected
- Ask the Enforcement Committee to weigh in on:
 - other potential paths to meet enforcement and monitoring goals (e.g., using VMS to reduce the PNOL reporting burden)
 - The next paper → potential impacts to compliance oversight.



Item #8. PNOL exemption and unloading hours

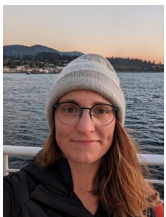
PRELIMINARY ASSESSMENT

“Potential to waive the prior notice of landing requirement and restricted unload hours for small IFQ/CQE deliveries (e.g., $\leq 2,000$ lb).”

- October 2025 Motion

Regarding potential expansion of unloading hours for *small IFQ/CQE deliveries*:

- Any expansion of OLE unloading hours (6am to 6pm) or operational hours (6am to 12am) for IFQ/CDQ may incur proportional increases to IFQ Program implementation costs and cost recovery fees.
- Costs related to expansion of OLE unloading/operational hours would likely be the same regardless of the size of deliveries made (e.g., staff time).



Item #9. Expansion of the designated unload areas for tenders receiving IFQ



Item #9. Expansion of unloading areas

PROPOSAL FOR ACTION

“Expansion of the designated unload areas for tenders receiving IFQ or CQE halibut or sablefish.” - October 2025 Motion

Testimony from October 2025 reported:

- Difficulty finding accessible processing and marketing options in remote communities.
 - Proposers suggested that the issue could be alleviated by expanding eligible unloading areas to tenders located outside of ports.
 - reduce operational costs of transit to ports (fuel, travel time)
 - May be particularly relevant to newly-formed CQE, Southeast Village Fisheries Collective (SVFC).
- Proposers also noted that access to tender service closer to fishing grounds is not exclusively relevant to CQE-derived IFQ.



Item #9. Expansion of unloading areas

REGULATIONS

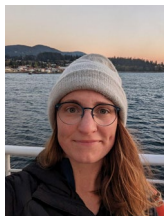
PNOL information requirements - 50 CFR 679.5(l)(1)(iii)

- “(B) Port of landing and port code” from Table 14a to Part 679
- “(C) Exact location of landing within the port (*i.e.*, dock name, harbor name, facility name, or geographical coordinates)”

Table 14a includes an option for “Other Alaska” **ports**.

⊙ Table 14a to Part 679—Port of Landing Codes¹, Alaska

Expand Table 	Port Name	NMFS Code	ADF&G Code
	Adak	186	ADA
	Akutan, Akutan Bay	101	AKU
	Alitak	103	ALI
	Anchorage	105	ANC



Item #9. Expansion of unloading areas

REGULATIONS

PNOL information requirements - 50 CFR 679.5(l)(1)(iii)

- “(B) Port of landing and port code” from Table 14a to Part 679
- “(C) Exact location of landing within the port (*i.e.*, dock name, harbor name, facility name, or geographical coordinates)”

Table 14a includes an option for “Other Alaska” **ports**.

Registered Buyer permits (50 CFR 679.4(d)(3)) are required of:

- Any person receiving IFQ/CDQ halibut or IFQ sablefish from the person who harvested the fish (IFQ/CDQ permit holder, IFQ/CDQ hired master)
- Any person who harvests IFQ/CDQ halibut or IFQ sablefish and transfers such fish in a dockside sale, outside of an IFQ regulatory area, or outside the State of Alaska
- A vessel operator who submits a Departure Report (§ 679.5(l)(4))



Item #9. Expansion of unloading areas

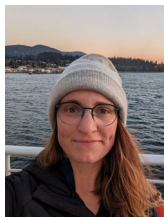
REGULATIONS

Collectively, PNOL and Register Buyer Landing Report regulations mean that **tenders with registered buyer permits must still be within ports** in order to receive IFQ/CDQ halibut or IFQ sablefish.

PRELIMINARY ASSESSMENT

No active tenders received IFQ landings in recent years.

- 2026 Report to the Fleet shows the number of tenders with registered buyer permits increased from 2 (2022 - 2024) to 4 in 2025, **and**
- **No tenders with registered buyer permits were actively receiving IFQ/CDQ deliveries during the 5-year period, 2021-2025.**



Item #9. Expansion of unloading areas

“Expansion of the designated unload areas for tenders receiving IFQ or CQE halibut or sablefish.” - October 2025 Motion

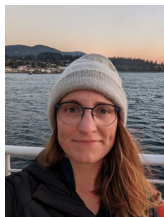
PRELIMINARY ASSESSMENT

If the Council wishes to move forward on this proposal, it may consider whether this motion is intended to:

1. Allow IFQ/CQE deliveries outside of ports, or
2. Expand the list of ports in Table 14a, or
3. Establish specific criteria (e.g., radii around ports), or
4. Add general language to clarify other types of locations allowable.

Additional considerations:

- Requisite regulatory changes, analyses of impacts for alternatives.
- Weighing the objectives of **Item #9** and the IFQ Program:
 - ability to unload closer to fishing grounds → increase operational efficiency
 - monitoring/enforcement goals of the IFQ Program
- Relative scope and potential benefits of alternatives.



Considering Items #8 and #9 together

Item #8: PNOL exemptions, expansion of unloading hours.

Item #9: Expansion of unloading areas.

If the Council moves forward with both **#8** and **#9**, the analyses would need to consider cumulative impacts of both changes.

e.g., If waiving PNOL for small deliveries (**Item #8**), would Registered Buyer landing reports still be required (as is the case under the two current PNOL waivers)?

- If so, would regulations for landing reports be revised to address **Item #9** for small deliveries?

50 CFR 679.5(7)(i)(C)

“Location (port code) of the landing (See Tables 14a, 14b, and 14c to this part).”



Other PNOL considerations (#8 and #9)

Item #8: PNOL exemptions, expansion of unloading hours.

Item #9: Expansion of unloading areas.

Should the Council recommend further analysis of **Items #8** and/or **#9**, it may wish to also consider:

- Consultation with the IPHC regarding sampling program intersection.
- Consultation with OLE regarding potential changes to unloading hours (**#8**) or areas (**#9**)
- Potential changes to program costs (e.g., OLE hours)
- Asking the Enforcement Committee to review these elements and provide recommendations if these two elements are included in an initial review draft analysis.



Next Steps



No further action



Request further information in another discussion paper



Initiate analysis/analyses

→ Identify purpose and need statement(s) and alternatives

→ Depending on scope of action may be appropriate to have a single or multiple analyses

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- | | |
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