C3 INITIAL REVIEW: CHARTER HALIBUT RECREATIONAL QUOTA ENTITY (RQE) FUNDING MECHANISM

OCTOBER 2021

PRESENTATION TO THE COUNCIL

Sarah Marrinan, NPMFC Staff
Kurt Iverson, NMFS Inseason Staff
In December 2016, the Council took final action to approve a regulatory program that would authorize a charter halibut non-profit RQE to purchase and hold commercial halibut quota share on behalf of the charter halibut anglers in Area 2C and 3A, which could relax annual management measures.

- Final Rule establishing the RQE did not dictate the RQE’s method of funding itself or any halibut quota share purchases.
- Management measures would apply to all charter halibut anglers - no option to opt out.

In April 2021, the Council considered a discussion paper which examined the concept of a charter halibut stamp.

- In response, the Council initiated this initial review analysis for broadly considering funding mechanisms.

Section 1.2; page 16-17
CURRENT ALTERNATIVES FOR CONSIDERATION

Alternative 1: No action (Status quo)

Alternative 2: Establish a fee collection program for charter vessel operators to fund the recreational Quota Entity

Describe the potential methods to collect a fee from charter vessel operators (e.g., halibut stamps) and mechanisms to subsequently distribute those funds to the RQE. Analysts should explore the range of potential fee collection methods currently used for North Pacific fisheries, including State of Alaska fisheries, and similar programs and provide information on likely administrative costs for collection and disbursement to the RQE."
IFQ COST RECOVERY

- MSA requires that Cost Recovery fees be collected for the direct costs directly related to the management, data collection, and enforcement of any limited access privilege programs.
- By purchasing halibut QS, the RQE will be participating in a LAPP (the IFQ Program).
- Recreational Fishing Quota is considered “used” if it augments the available charter allocation.
- Unclear at this point if the incremental management costs related to RFQ would be combined in the Cost Recovery Program with other IFQ Program costs.
OPTION 1: CHARTER HALIBUT STAMP

- Would require a charter operators to purchase a halibut stamp for each guided angler, for each day that the charter angler is on a charter vessel that intends to harvest halibut
  - Or when halibut was retained
  - Determine who the “operator” is
  - Doesn’t have to be called a “stamp”

Section 3.6.1; page 57-66
Online sale and stamp distribution platform
Operators could purchase (or cache) stamps once a season, multiple times and season or even every day
Includes a system to validate stamps when used
Pay either when stamps are obtained or when they are validated
Requires on-the-water enforcement and Alaska Wildlife Trooper cooperation
<table>
<thead>
<tr>
<th></th>
<th>Angler Days*</th>
<th>$10</th>
<th>$15</th>
<th>$20</th>
</tr>
</thead>
<tbody>
<tr>
<td>2C</td>
<td>106,753</td>
<td>$1,067,530</td>
<td>$1,601,295</td>
<td>$2,135,060</td>
</tr>
<tr>
<td>3A</td>
<td>103,591</td>
<td>$1,035,910</td>
<td>$1,553,865</td>
<td>$2,071,820</td>
</tr>
</tbody>
</table>

* Any day where halibut was harvested or days that were open to halibut retention where bottomfish hours or statistical areas were recorded were considered to be a halibut fishing trip

Adapted from Table 19; page 63
OPTION 2: ANNUAL OPERATOR FEE

- Tied to the renewal of a Charter Halibut Permit (CHP)
- Administrative action, no on-the-water enforcement
- Administered similar to Cost Recovery
  - CHP holders billed annually with paper invoices and bills could be paid through eFish
  - If they are not paid in full, the CHP is flagged and may not be renewed until payment is received.
ANNUAL OPERATOR FEE

- Uniform fee or fee based on angler effort associated with a CHP (per angler fee or tiered fee)
- ADF&G saltwater logbook represent the only mandatory census source of charter halibut angler effort.
- There are some drawbacks and obstacles to this
  - ADF&G has expressed concern about the potential for non-reporting.
  - The logbooks were not designed for this purpose, and it may require some restructuring
  - Lag in when the data is available – unlike to be available to assess a fee for the very next year.
  - Substantial data cleaning which will require staff time and effort
  - Some errors will not be detected
  - Would need a robust appeals process if an operators wishes to refute their bill

Section 3.6.2; page 67-76
## POTENTIAL REVENUE FROM AN ANNUAL OPERATOR FEE

<table>
<thead>
<tr>
<th>Year</th>
<th>2C Halibut Angler Days*</th>
<th>$10</th>
<th>$15</th>
<th>$20</th>
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<tbody>
<tr>
<td>2019</td>
<td>70,091</td>
<td>$700,910</td>
<td>$1,051,365</td>
<td>$1,401,820</td>
</tr>
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<td></td>
<td>85,330</td>
<td>$  853,300</td>
<td>$1,279,950</td>
<td>$  1,706,600</td>
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</tbody>
</table>

* “Halibut angler day” means any day where halibut was reported as retained by an angler

Adapted from Table 27; page 72
Distribution of fees across Area 2C businesses ($10/angler fee)

Note: the concept considered under annual operator fee would charge a fee to the CHP holder, not the business

Figure 9; page 73
Note: the concept considered under annual operator fee would charge a fee to the CHP holder, not the business

Figure 10; page 75
<table>
<thead>
<tr>
<th>Category of benefit/challenge</th>
<th>Charter halibut stamp</th>
<th>Annual operator fee – Tied to angler effort</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Benefits</td>
<td>Challenges</td>
</tr>
</tbody>
</table>
| Administration                | ▪ Would not require issuing invoices and administering payments and following up with non-payment | ▪ Cost and staff for development/ implementation/ facilitation of the program  
▪ NMFS does not have widespread in-person user support | ▪ NMFS has experience implementing other types of administrative fees | ▪ The need to set up a robust appeals process for operators to dispute the angler effort associated with their fee |
| Data sourcing                 | ▪ Would not require using ADF&G logbook data as the primary data source (which presents challenges) |                                                         |                                                         |                                                         |
| Enforcement                   | ▪ Would require substantial enforcement effort, including partner agencies such as Alaska Wildlife Troopers  
▪ On the water enforcement would add to agency costs (particularly in the case of violations) | ▪ May not require on the water enforcement (administrative only) |                                                         |                                                         |
| User-fee concept (more support from the charter sector in tying to angler effort) | ▪ More clearly tied to angler effort |                                                         |                                                         | ▪ Although tied to angler effort, not as clearly as the requirement to hold a stamp |

Adapted from Table 18; page 56
IMPACTS TO THE CHARTER SECTOR

**Costs**
- Clear cost to the sector
- Likely absorbed differently across businesses (i.e., amount absorbed as an operating cost vs passed on to the angler)
- Wide distribution in angler effort across businesses (some could owe up to $82K per year based on angler effort associated with a business and a $20 fee per angler. Most businesses much less.)

**Benefits**
- Allow for the relaxation of management measures relative to status quo (e.g., day of the week closures, size limits, bag limits, annual limits, etc.)
- How that translates to benefits for the sector much more difficult to explain and predict
- Different angler preferences/price sensitivity
- Lag effect of benefits
- Variability in what the additional QS means for the sector based on external factors (i.e., predicted angler removals and where the IPHC sets the area catch limits)
Oct 27th – Charter Halibut Management Committee will also discuss this issue.

Thank you. Questions?

Photo credit: R. Yamada