

# C2 VESSEL CAPS

ANNA HENRY, MAY 15, 2020



# PROPOSED ACTION

- The Council received two separate letters requesting exemptions from vessel caps in the IFQ fishery for the remainder of the 2020 season.
  - [Request for Halibut Vessel Cap Exemption in Area 4B, 4CDE 4-24-20](#) (CBSFA- Option 1)
  - [Request for IFQ vessel cap exemption in BS and GOA 4-27-20](#) (DSFU, FVOA- Option 2)
- Requests cite a potential lack of harvesting capacity as fewer vessels operate this season due to health concerns and market factors creating difficult economic conditions.
- Public written comment on e-agenda



# OPTION I

- Grant a temporary exemption from halibut vessel limitations in IPHC regulatory Areas 4B, 4C, 4D and 4E\* for the remainder of the 2020 IFQ season.

\*Vessel IFQ Caps are calculated on the IFQ TAC only; CDQ TACs are not included in the calculations. IPHC Area 4CDE as referred to in this document includes only the IFQ in Areas 4C/D (100% of the annual halibut quota in 4E is apportioned to CDQ).

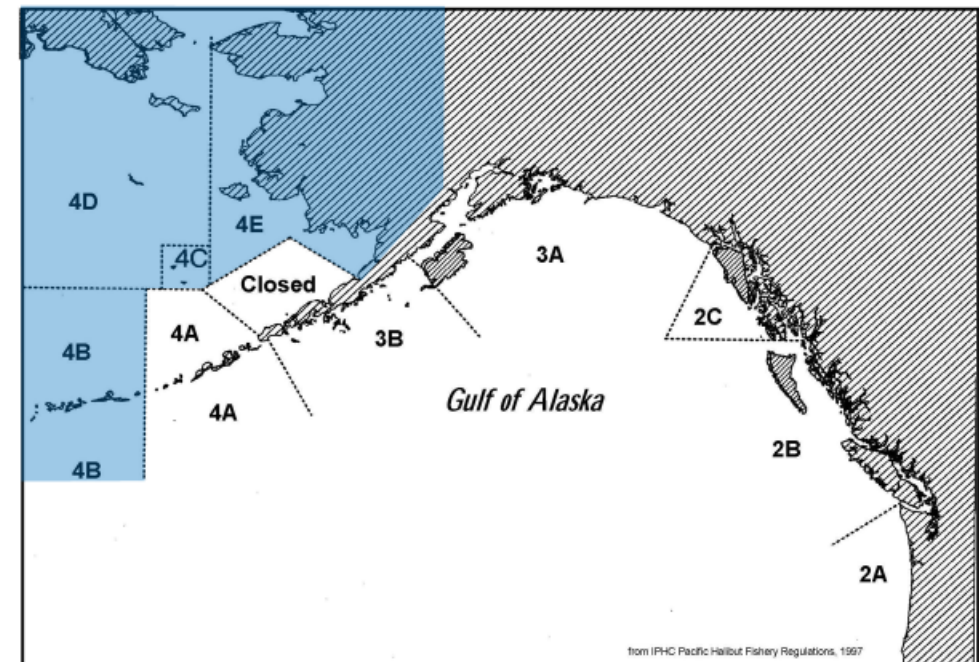


Figure I. IPHC regulatory areas. Areas included in Option I are highlighted in blue.



# OPTION 2

- Grant a temporary exemption from vessel limitations for halibut in IPHC Regulatory Areas 3 and 4 and sablefish in the Bering Sea area and Gulf of Alaska Sub-areas of the Western Gulf, Central Gulf and West Yakutat for the remainder of the 2020 IFQ season.

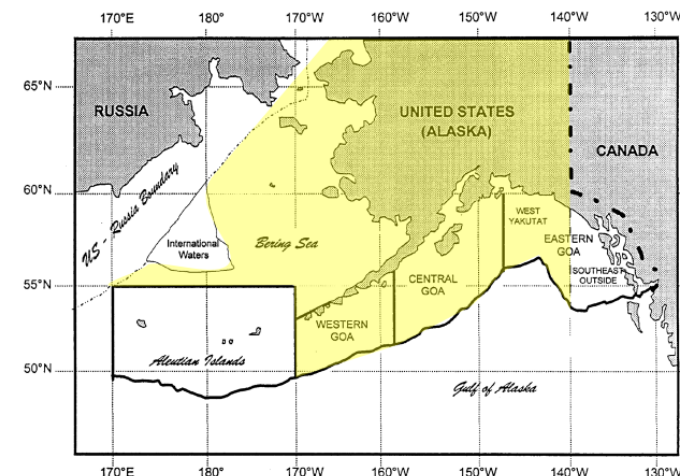
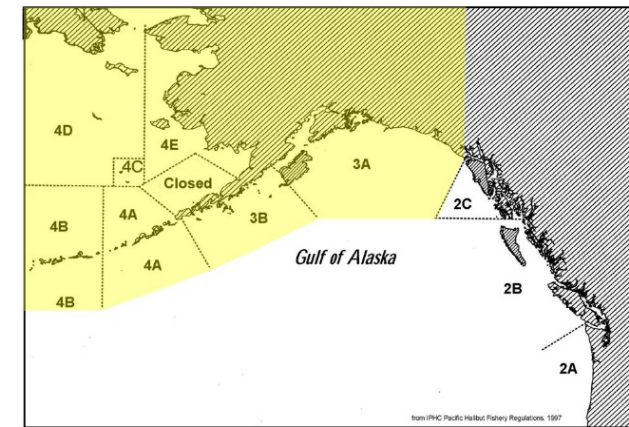


Figure 2. IPHC regulatory areas (top) and sablefish regulatory areas (bottom). Areas included in Option 2 are highlighted yellow.



# VESSEL CAPS

- No vessel may be used, during any fishing year, to harvest more IFQ than:
  - 0.5% of All Halibut IFQ TAC
  - 1% of all Sablefish IFQ TAC
- Separate southeast caps (not included in these requests)
  - 1% 2C Halibut IFQ TAC
  - 1% of SE Sablefish IFQ TAC
- Exception if an individual IFQ holder receives IFQ allocation in excess of the vessel cap they may harvest their allocation on one vessel



# VESSEL CAPS

**Table 1. Annual catch limits and vessel caps for halibut, 2013-2020.**

Year	Halibut	Areas 3A, 4A, 4B, 4CDE	Area 2C	
	Total Catch Limit (lbs)	Vessel Cap (lbs)	Area Catch Limit (lbs)	Vessel Cap (lbs)
2013	21,810,800	109,054	2,970,000	29,700
2014	15,954,370	79,772	3,318,720	33,187
2015	17,136,920	85,685	3,679,000	36,790
2016	17,152,320	85,762	3,924,000	39,240
2017	18,295,400	91,477	4,212,000	42,120
2018	16,630,200	83,151	3,570,000	35,700
2019	17,710,000	88,550	3,610,000	36,100
2020	16,079,200	80,396	3,410,000	34,100

Source: NMFS Restricted Access Management (RAM).

**Table 2. Annual catch limits and vessel caps for sablefish 2013-2020.**

Year	Sablefish	Areas AI, BS, WG, CG, WY	Area SE	
	Total Catch Limit (lbs)	Vessel Cap (lbs)	Area Catch Limit (lbs)	Vessel Cap (lbs)
2013	28,013,851	280,139	7,032,674	70,327
2014	23,679,609	236,796	5,941,397	59,414
2015	23,569,378	235,694	5,912,737	59,127
2016	20,352,867	203,529	5,108,058	51,081
2017	22,577,309	225,773	5,745,188	57,452
2018	25,800,434	258,004	6,556,480	65,565
2019	25,967,983	259,680	6,578,526	65,785
2020	31,708,762	317,088	8,075,450	80,754

Source: NMFS Restricted Access Management (RAM).



**Table 3. Halibut annual area allocation, and minimum number of vessels required to harvest 100% of IFQ in each area under the vessel cap.** Annual totals and totals each fishing year through May 3 of percent of allocation landed, and number of vessels harvesting IFQ. Area 2C data are provided for comparison only, as it is not included in this exemption request.

Area	Year	Allocation (pounds)	Minimum no. of vessels to harvest 100%	Annual Total		Fishing Year to Date (May 3)	
				No. of vessels harvesting IFQ	Percent landed	No. of vessels harvesting IFQ	Percent landed
2C	2015	3,679,000	100	439	96%	164	37%
	2016	3,924,000	100	433	97%	173	41%
	2017	4,212,000	100	423	96%	164	36%
	2018	3,570,000	100	402	95%	127	30%
	2019	3,610,000	100	406	94%	146	33%
	2020	3,410,000	100			81	17%
3A	2015	7,790,000	91	441	99%	168	28%
	2016	7,336,000	86	431	99%	164	25%
	2017	7,739,000	85	415	98%	145	25%
	2018	7,350,000	89	401	98%	138	24%
	2019	8,060,000	92	408	98%	142	26%
	2020	7,050,000	88			81	13%
3B	2015	2,650,000	31	196	98%	30	11%
	2016	2,710,000	32	194	97%	41	16%
	2017	3,140,000	35	192	96%	34	12%
	2018	2,620,000	32	182	93%	25	9%
	2019	2,330,000	27	169	94%	37	15%
	2020	2,410,000	30			11	4%
4A	2015	1,390,000	17	68	95%	5	3%
	2016	1,390,000	17	69	97%	2	*
	2017	1,390,000	16	65	91%	5	2%
	2018	1,370,000	17	67	89%	6	4%
	2019	1,650,000	19	63	83%	10	6%
	2020	1,410,000	18			6	2%
4B	2015	912,000	11	33	93%	2	*
	2016	912,000	11	34	94%	4	11%
	2017	912,000	10	30	91%	3	*
	2018	840,000	11	27	98%	6	13%
	2019	968,000	11	24	76%	6	20%
	2020	880,000	11			3	*
4CDE	2015	715,920	9	38	96%	0	*
	2016	880,320	11	36	96%	2	*
	2017	902,400	10	38	96%	1	*
	2018	880,200	11	38	90%	1	*
	2019	1,092,000	13	42	82%	1	*
	2020	919,200	12			0	*

\* Data cannot be reported due to confidentiality.

Source: NMFS Restricted Access Management (RAM) division IFQ landings database sourced through AKFIN.



**Table 3. Halibut annual area allocation, and minimum number of vessels required to harvest 100% of IFQ in each area under the vessel cap.** Annual totals and totals each fishing year through May 3 of percent of allocation landed, and number of vessels harvesting IFQ. Area 2C data are provided for comparison only, as it is not included in this exemption request.

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	2020	919,200	12			0	*

More than minimum number



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	2019	1,092,000	13	42	82%	1	*
	2020	919,200	12			0	*

2020 < 2015-19

2020 ≈ 2015-19



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	2016	2,059,096	11	21	32%	3	*
	2017	2,294,989	11	19	30%	5	7%
	2018	2,630,088	11	22	27%	6	7%
	2019	2,656,543	11	21	29%	6	10%
	2020	2,696,226	9			5	14%
BS	2015	1,177,256	5	34	27%	3	*
	2016	1,014,116	5	28	39%	1	*
	2017	1,124,346	5	25	54%	5	12%
	2018	1,291,896	6	26	48%	7	11%
	2019	1,313,942	6	24	60%	10	24%
	2020	1,640,222	6			7	14%
CG	2015	8,214,340	35	157	96%	69	23%
	2016	7,094,403	35	153	98%	67	18%
	2017	7,960,811	36	148	96%	62	19%
	2018	9,096,180	36	145	82%	67	15%
	2019	9,131,453	36	131	87%	64	17%
	2020	11,366,918	36			36	9%
WG	2015	2,599,223	12	54	78%	5	5%
	2016	2,244,283	12	61	89%	10	8%
	2017	2,378,763	11	60	95%	8	10%
	2018	2,722,681	11	60	87%	10	11%
	2019	2,788,819	11	52	86%	9	6%
	2020	3,425,948	11			2	*
WY	2015	3,282,649	14	99	100%	55	57%
	2016	2,832,911	14	103	99%	55	50%
	2017	3,073,212	14	103	99%	45	52%
	2018	3,503,109	14	95	96%	46	39%
	2019	3,498,700	14	90	97%	43	31%
	2020	4,503,998	15			27	29%
SE	2015	5,912,737	100	177	99%	97	41%
	2016	5,108,058	100	176	100%	96	39%
	2017	5,745,188	100	170	99%	85	35%
	2018	6,556,480	100	173	95%	82	29%
	2019	6,578,526	100	168	96%	96	31%
	2020	8,075,450	100			72	23%

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	2018	2,630,088	11	22	27%	6	7%
	2019	2,656,543	11	21	29%	6	10%
	2020	2,696,226	9			5	14%
BS	2015	1,177,256	5	34	27%	3	*
	2016	1,014,116	5	28	39%	1	*
	2017	1,124,346	5	25	54%	5	12%
	2018	1,291,896	6	26	48%	7	11%
	2019	1,313,942	6	24	60%	10	24%
	2020	1,640,222	6			7	14%
CG	2015	8,214,340	35	157	96%	69	23%
	2016	7,094,403	35	153	98%	67	18%
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	2018	9,096,180	36	145	82%	67	15%
	2019	9,131,453	36	131	87%	64	17%
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WY	2015	3,282,649	14	99	100%	55	57%
	2016	2,832,911	14	103	99%	55	50%
	2017	3,073,212	14	103	99%	45	52%
	2018	3,503,109	14	95	96%	46	39%
	2019	3,498,700	14	90	97%	43	31%
	2020	4,503,998	15			27	29%
SE	2015	5,912,737	100	177	99%	97	41%
	2016	5,108,058	100	176	100%	96	39%
	2017	5,745,188	100	170	99%	85	35%
	2018	6,556,480	100	173	95%	82	29%
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	2020	8,075,450	100			72	23%

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	2016	2,059,096	11	21	32%	3	*
	2017	2,294,989	11	19	30%	5	7%
	2018	2,630,088	11	22	27%	6	7%
	2019	2,656,543	11	21	29%	6	10%
	2020	2,696,226	9			5	14%
BS	2015	1,177,256	5	34	27%	3	*
	2016	1,014,116	5	28	39%	1	*
	2017	1,124,346	5	25	54%	5	12%
	2018	1,291,896	6	26	48%	7	11%
	2019	1,313,942	6	24	60%	10	24%
	2020	1,640,222	6			7	14%
CG	2015	8,214,340	35	157	96%	69	23%
	2016	7,094,403	35	153	98%	67	18%
	2017	7,960,811	36	148	96%	62	19%
	2018	9,096,180	36	145	82%	67	15%
	2019	9,131,453	36	131	87%	64	17%
	2020	11,366,918	36			36	9%
WG	2015	2,599,223	12	54	78%	5	5%
	2016	2,244,283	12	61	89%	10	8%
	2017	2,378,763	11	60	95%	8	10%
	2018	2,722,681	11	60	87%	10	11%
	2019	2,788,819	11	52	86%	9	6%
	2020	3,425,948	11			2	*
WY	2015	3,282,649	14	99	100%	55	57%
	2016	2,832,911	14	103	99%	55	50%
	2017	3,073,212	14	103	99%	45	52%
	2018	3,503,109	14	95	96%	46	39%
	2019	3,498,700	14	90	97%	43	31%
	2020	4,503,998	15			27	29%
SE	2015	5,912,737	100	177	99%	97	41%
	2016	5,108,058	100	176	100%	96	39%
	2017	5,745,188	100	170	99%	85	35%
	2018	6,556,480	100	173	95%	82	29%
	2019	6,578,526	100	168	96%	96	31%
	2020	8,075,450	100			72	23%

More than minimum number

Less than minimum number



\* Data cannot be reported due to confidentiality.

Source: NMFS Restricted Access Management (RAM) division IFQ landings database sourced through AKFIN.



**Table 4. Sablefish annual area allocation, and minimum number of vessels required to harvest 100% of IFQ in each area under the vessel cap.** Annual totals and totals each fishing year through May 3 of percent of allocation landed, and number of vessels harvesting IFQ. AI and SE area data are provided for comparison only, as they are not included in this exemption request.

Area	Year	Allocation (pounds)	Minimum number of vessels to harvest 100%	Annual Total		Fishing Year to Date (May 3)	
				Number of vessels harvesting IFQ	Percent landed	Number of vessels harvesting IFQ	Percent landed
AI	2015	2,383,173	11	26	37%	2	*
	2016	2,059,096	11	21	32%	3	*
	2017	2,294,989	11	19	30%	5	7%
	2018	2,630,088	11	22	27%	6	7%
	2019	2,656,543	11	21	29%	6	10%
	2020	2,696,226	9			5	14%
BS	2015	1,177,256	5	34	27%	3	*
	2016	1,014,116	5	28	39%	1	*
	2017	1,124,346	5	25	54%	5	12%
	2018	1,291,896	6	26	48%	7	11%
	2019	1,313,942	6	24	60%	10	24%
	2020	1,640,222	6			7	14%
CG	2015	8,214,340	35	157	96%	69	23%
	2016	7,094,403	35	153	98%	67	18%
	2017	7,960,811	36	148	96%	62	19%
	2018	9,096,180	36	145	82%	67	15%
	2019	9,131,453	36	131	87%	64	17%
	2020	11,366,918	36			36	9%
WG	2015	2,599,223	12	54	78%	5	5%
	2016	2,244,283	12	61	89%	10	8%
	2017	2,378,763	11	60	95%	8	10%
	2018	2,722,681	11	60	87%	10	11%
	2019	2,788,819	11	52	86%	9	6%
	2020	3,425,948	11			2	*
WY	2015	3,282,649	14	99	100%	55	57%
	2016	2,832,911	14	103	99%	55	50%
	2017	3,073,212	14	103	99%	45	52%
	2018	3,503,109	14	95	96%	46	39%
	2019	3,498,700	14	90	97%	43	31%
	2020	4,503,998	15			27	29%
SE	2015	5,912,737	100	177	99%	97	41%
	2016	5,108,058	100	176	100%	96	39%
	2017	5,745,188	100	170	99%	85	35%
	2018	6,556,480	100	173	95%	82	29%
	2019	6,578,526	100	168	96%	96	31%
	2020	8,075,450	100			72	23%

2020 ≈ 2015-19

2020 < 2015-19



\* Data cannot be reported due to confidentiality.

Source: NMFS Restricted Access Management (RAM) division IFQ landings database sourced through AKFIN.



# PRICETRENDS

**Table 5. Annual nominal price per pound and percent change of halibut and sablefish prices in the BSAI and GOA region.** Prices are only for the purpose of estimating annual differences and do not reflect final pricing. Final prices are adjusted by CFEC to include contracts and COAR information at the end of the year.

Year	Region	Halibut price per pound	% change from previous year	Sablefish price per pound	% change from previous year
2015	BSAI	5.80		4.46	
2016	BSAI	5.98	3%	5.28	18%
2017	BSAI	5.62	-6%	4.41	-16%
2018	BSAI	4.52	-20%	3.33	-24%
2019	BSAI	4.48	-1%	2.81	-16%
2020*	BSAI	**	**	**	**
2015	GOA	6.48		5.71	
2016	GOA	6.72	4%	6.42	12%
2017	GOA	6.34	-6%	7.43	16%
2018	GOA	5.38	-15%	5.41	-27%
2019	GOA	5.51	2%	4.25	-21%
2020*	GOA	4.07*	-26%	2.92*	-31%

\*2020 prices are through May 3.

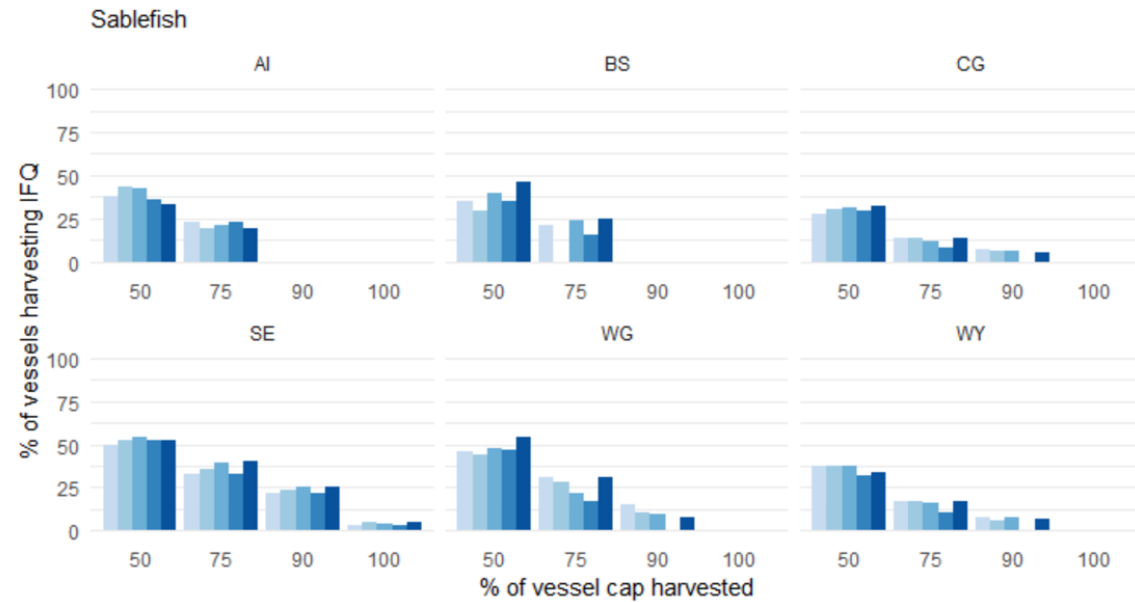
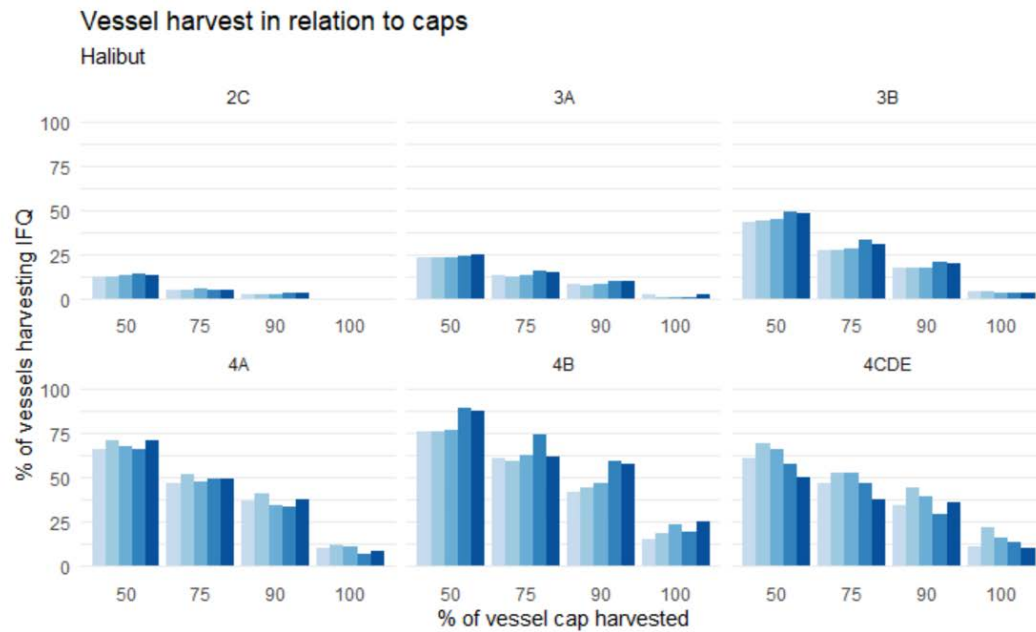
\*\*data cannot be reported due to confidentiality.

Source: NMFS Restricted Access Management (RAM) division IFQ landings database sourced through AKFIN





# VESSEL HARVEST



YEAR 2015 2016 2017 2018 2019

Source: NMFS Restricted Access Management (RAM) division IFQ landings database sourced through AKFIN.

**Figure 3.** Percent of vessels harvesting IFQ in each regulatory area with total landings within 100%, 90%, 75% and 50% of the vessel cap. Percent of vessel cap harvested is calculated by total IFQ regardless of area of harvest (with the exception of 2C and SE). Vessels harvesting in multiple areas are included in every area IFQ is harvested.



# POTENTIAL IMPACTS

## No Action (maintaining vessel caps)

- Limit IFQ consolidation on vessels
  - Maintains the necessity for a minimum number of vessels to prosecute the fishery and may preserve opportunities for smaller operations, crew and new entrants
  - May limit opportunities for efficiency and increase the likelihood that annual allocation is left unharvested if the supply of vessels is decreased in 2020 such that the entire allocation cannot be spread out amongst participating vessels while meeting vessel limitations
    - Depends on how many vessels do not operate due to health and safety concerns related to COVID-19 or because individual operators cannot justify the costs to operate a vessel given the decline in ex-vessel prices or other changes in profitability related to the global pandemic



# POTENTIAL IMPACTS

## Emergency action (waving vessel caps)

- Allow greater IFQ consolidation on vessels
  - May reduce COVID-19 related safety risks associated with the operation of more, likely smaller scale operations, and increase profitability of some operations
  - May decrease the participation of smaller scale vessels and reduce the number of available crew jobs and opportunities for new entrants
- Interaction with other potential actions
- Implementation challenges



# COUNCIL DECISION POINTS

- Does this meet emergency criteria?
  - Results from recent, unforeseen events or recently discovered circumstances;
  - Presents serious conservation or management problems in the fishery
  - Immediate benefits of emergency regulations outweigh the value of normal rule making process (advance notice, public comment, and deliberative consideration of the impacts on participants)
- Specify rationale and make a recommendation
  - No action- existing vessel caps remain in place
  - Option 1- exempt vessel caps in IPHC Areas 4B, 4C, 4D and 4E for the remainder of the 2020 IFQ season
  - Option 2- exempt vessel caps for halibut in IPHC Areas 3 and 4 and sablefish in the BS, WG, CG, WY for the remainder of the 2020 IFQ season



# QUESTIONS?

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