



# C2 Draft for Final Action:

BERING SEA ALEUTIAN ISLAND PACIFIC COD  
SMALL VESSEL ACCESS

October 2022

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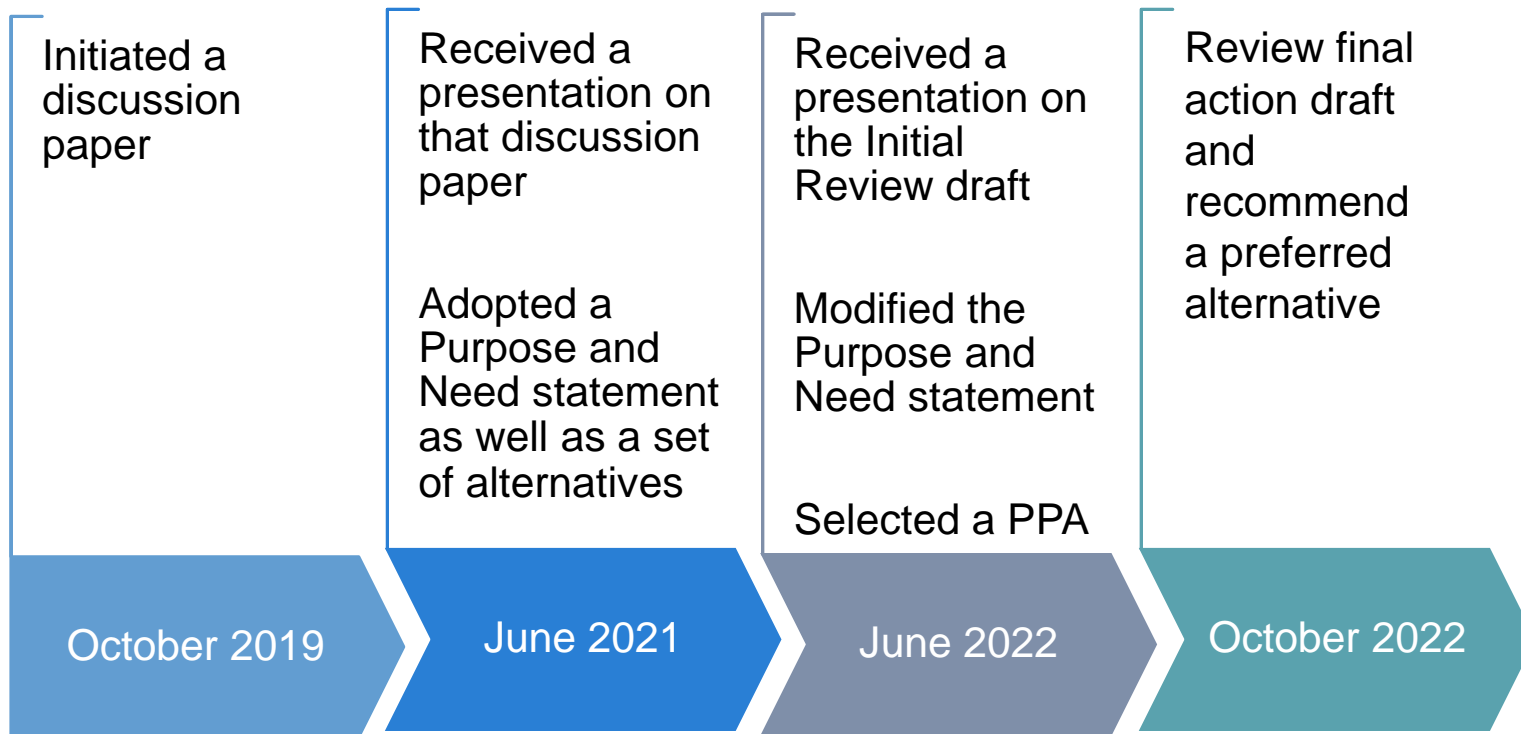
# ACTION UNDER CONSIDERATION



A proposed amendment to the BSAI groundfish FMP that would require smaller vessels operating in the <60' H&L/pot CV sector to harvest Pacific cod from the jig sector's allocation.



# 1.2 HISTORY OF COUNCIL ACTION



## 1.2 PURPOSE AND NEED STATEMENT

*Increased participation, reduced Pacific cod TACs, and fewer reallocations from other Pacific cod sectors, have resulted in shortened seasons for the <60 ft hook-and-line and pot catcher vessel Pacific cod sector. Due to their size, smaller vessels in this sector are particularly affected by these shortened seasons because vessel operators have less flexibility to fish when the weather is poor and typically fish waters closer to port which may be less productive. The jig sector allocation has not historically been fully utilized, particularly in the A and C seasons. Allowing these smaller catcher vessels using hook-and-line and pot gear to harvest Pacific cod from the jig sector allocation may increase stability for current fishery participants and potential new entrants with smaller catcher vessels without negatively impacting catcher vessels using jig gear.*



# DESCRIPTION OF ALTERNATIVES

- Alternative 1: No Action
- **Alternative 2: Redefine the current BSAI Pacific cod jig sector to include H&L or pot CVs less than or equal to:**
- **Option 1: 55' LOA**
  - All H&L/pot vessels  $\leq 55'$  LOA and jig vessels would form the 'new small vessel sector' and required to harvest Pacific cod from the jig sector's 1.4% allocation.
    - BSAI Pacific cod allocation would be apportioned on a trimester basis.
  - All H&L/pot CVs  $>55'$  LOA (i.e., 56-59') would form the 'redefined  $<60'$  H&L/pot CV sector' and be required to harvest Pacific cod from their current sector's 2% allocation.
    - BSAI Pacific cod allocation available on January 1.
  - Vessels would be eligible for either sector based on the LOA and gear type and would not be able to opt into one sector or another.
- **Suboption: B-season jig only fishery**
  - A season (Jan 1-Apr 30): H&L, pot, and jig
  - B season (Apr 30-Aug31): jig
  - C season (Aug 31-Dec 31): H&L, pot, and jig



# PRIMARY ANALYTICAL CHANGES SINCE JUNE 2022

- Added clarifying language throughout the impact analysis regarding the uncertainty of smaller H&L/pot vessel's future fishing behavior.
- Information on the days the <60' H&L/pot CV sector is fishing in a calendar year in relation to the sector's final allocation (Table 4-1).
- Additional specificity for vessels likely to be impacted by LOA (Table 4-2 and 4-3) and community ownership address (Table 4-15 and 4-16).
- Vessel stability and safety including spatial data on the <60' H&L/pot CV sector.
- Reallocations v. rollovers (Section 4.3.4)



# ANALYSIS OF IMPACTS

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# BSAI PACIFIC COD ALLOCATIONS

- The PPA would not impact the jig or <60' H&L/pot CV sector's allocation amount.
- The PPA would impact the vessel size and gear type that is required to harvest Pacific cod from each allocation.
- This action would likely impact reallocations among the two sectors.

Table 3-2 Percent of non-CDQ BSAI Pacific cod sector allocations by BSAI groundfish FMP amendment

Sector	Amend 24 1994	Amend 46 1997	Amend 64 2000	Amend 77 2004	Amend 85 2008
Jig	2.0	2.0	2.0	2.0	1.4
H&L/Pot CV <60' LOA	44.0	51.0	0.7	0.7	2.0
H&L CV ≥60' LOA			0.2	0.2	0.2
H&L CP			40.8	40.8	48.7
Pot CV ≥60' LOA			9.3	7.6	8.4
Pot CP				1.7	1.5
AFA trawl CP	54.0	23.5	23.5	23.5	2.3
Non-AFA trawl CP					13.4
Trawl CV					23.5





## 4.3.1 CHANGES IN SECTOR COMPOSITION

- The PPA would impact the vessel size and gear type that is required to harvest Pacific cod from the jig and <60' H&L/pot CV sector's allocations.
- **Jig –**
  - 33 jig vessels have participated since 2008
    - Annual average level of participation is 4 vessels
    - 1 vessel that regularly participates and would be most impacted by the PPA
- **<60 H&L/pot CV –**
  - 94 H&L/pot vessels have participated since 2008
    - Annual average level of participation is 27 vessels
    - 61 vessels are >56' LOA, 5 vessels have a reported LOA of exactly 56', and 28 vessels are ≤55' LOA.

		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	Annual Average Count
<b>Option 1</b>	<i>Small vessel sector (jig + ≤55' H&amp;L /pot CV)</i>	22	12	11	17	10	13	7	8	4	2	4	8	10	2	9
	<i>Redefined &lt;60' sector (&gt;55' H&amp;L /pot CV)</i>	20	19	19	16	18	20	16	21	20	22	26	30	34	24	22
<b>Option 2</b>	<i>Small vessel sector (jig + ≤56' H&amp;L/pot CV)</i>	24	15	13	18	11	15	9	11	7	6	7	11	13	5	12
	<i>Redefined &lt;60' sector (&gt;56' H&amp;L/pot CV)</i>	18	16	17	15	17	18	14	18	17	19	23	27	31	21	19

Table 4-3 Count of vessels that would have been eligible for the new BSAI Pacific cod small vessel sector and the redefined less than 60' H&L or pot CV sector under option 1 and option 2 from 2008 through 2021



# BSAI PACIFIC COD REALLOCATIONS

**Table 3-3 2022 BSAI Pacific cod non-CDQ sector allocations and seasonal allowances**

- Decisions to reallocate BSAI Pacific cod are based on the hierarchy set in Federal regulations.
  - These decisions consider the sector's capacity to harvest both their initial Pacific cod allocation and any reallocations they may receive.
- Any unused portion of the seasonal allowance from any sector, *except the jig sector*, is rolled over to that sector's next season.
- 95% of the jig sector's initial allocation has been reallocated to the <60' H&L/pot CV sector (on average, 2008-2021).
  - Reallocations from the jig sector have accounted for 30% of the sector's final allocation.

Sector	BSAI Sector Allocation (mt)	BSAI Seasons and allowance (mt)		
		A	B	C
<b>H&amp;L/Pot CV &lt; 60' LOA</b>	2,671	No seasonal allowances		
<b>H&amp;L CV ≥ 60' LOA</b>	267	<i>Jan 1-June 10</i> (51%) 136	<i>June 10 -Dec 31</i> (49%) 131	n/a
<b>H&amp;L CP</b>	65,027	<i>Jan 1-June 10</i> (51%) 33,164	<i>June 10 -Dec 31</i> (49%) 31,863	n/a
<b>Pot CV ≥ 60' LOA</b>	11,216	<i>Jan 1-June 10</i> (51%) 5,720	<i>Sept 1 -Dec 31</i> (49%) 5,496	n/a
<b>Pot CP</b>	2,003	<i>Jan 1-June 10</i> (51%) 1,021	<i>Sept 1 -Dec 31</i> (49%) 981	n/a
<b>Jig</b>	1,879	<i>Jan 1- Apr 30</i> (60%) 1,127	<i>Apr 30-Aug 31</i> (20%) 376	<i>Aug 31- Dec 31</i> (20%) 376
<b>AFA Trawl CP</b>	3,086	<i>Jan 20-April 1</i> (75%) 2,315	<i>April 1-June 10</i> (25%) 772	<i>June 10- Nov 1</i> (0%) 0
<b>Amendment 80</b>	17,981	<i>Jan 20-April 1</i> (75%) 13,485	<i>April 1-June 10</i> (25%) 4,495	<i>June 10- December 31</i> (0%) 0
<b>Trawl CV</b>	29,655	<i>Jan 20-April 1</i> (74%) 21,944	<i>April 1-June 10</i> (11%) 3,262	<i>June 10-Nov 1</i> (15%) 4,448



## 4.3.4.1 REALLOCATION IMPACTS

- **At the June 2022 meeting, the Council stated its intent is to maintain the current reallocation hierarchy.**
  - Provides flexibility to the Regional Administrator and in-season management to make reallocations.
  - Could mitigate some of the PPA's cumulative impacts.
- **Under this approach, there are different potential future scenarios to consider.**
- If the redefined <60' H&L/pot CV sector was still open when NMFS could project unused cod in the new small vessel sector, NMFS could make that reallocation in a way that would allow the sector to continue fishing without experiencing a disruption.
- If the redefined <60' H&L/pot CV sector were already closed and a reallocation could be made, it does not mean NMFS would necessarily reopen the sector.
  - NMFS would only reopen the sector if there were enough Pacific cod available to conservatively manage the sector and if vessels are available.
- **Under the PPA, the timing of a potential reallocation from the new small vessel sector to the redefined <60' H&L/pot CV sector could change.**
  - There is uncertainty about the future fishing behavior of smaller H&L/pot vessels, and it would take a couple of years for in-season management to better predict if or when reallocations could occur.



# 4.3.4 VESSEL SAFETY AND STABILITY

The BSAI Pacific cod less than 60' H&L or pot CV sector landings 2008-2021

vessel length ≤ 55' (metric tons)

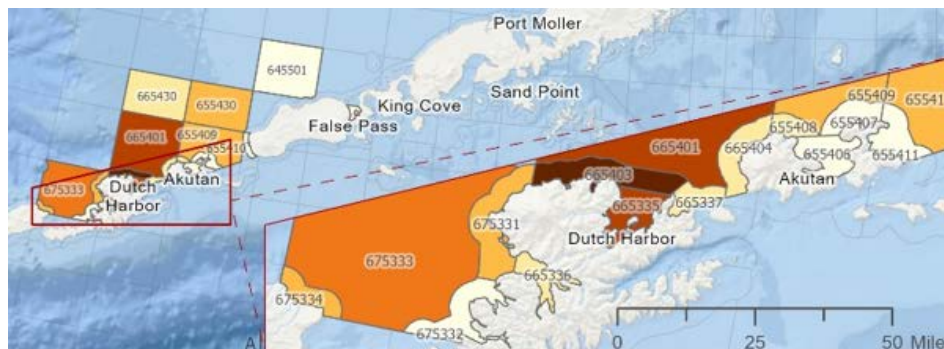
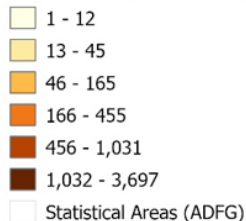


Figure 4-3

The BSAI Pacific cod less than 60' H&L or pot CV sector landings 2008-2021

vessel length 56' (metric tons)

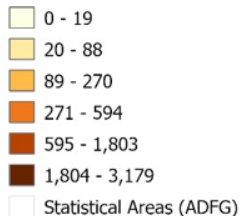


Figure 4-4

The BSAI Pacific cod less than 60' H&L or pot CV sector landings 2008-2021

vessel length 57-59' (metric tons)

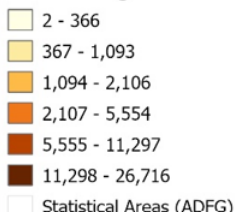


Figure 4-5



## 4.3.4 VESSEL SAFETY AND STABILITY

- The Council is considering this action to provide more stability to H&L/pot vessels  $\leq 55'$  LOA.
- The PPA could have a positive impact on the safety and stability of smaller H&L/pot vessels by allowing them more flexibility to determine when to fish.
  - Potential for extended A and C seasons.
- The PPA could have a negative impact on the stability and safety of larger H&L/pot vessels that may fish at a faster pace early in the year as there could be less BSAI Pacific cod TAC available with a delayed reallocation or no reallocation.



## 4.3.5 REVENUE IMPACTS

- Section 4.3.5 of the analysis provides estimates for the potential revenue impact and opportunity under this action.
- The estimated annual average gross ex-vessel revenue impact for H&L/pot CVs >56' LOA is a decrease of \$1.22 million (Table 4-5), accounting for 22 percent of these vessel's total revenue for Federal BSAI Pacific cod (on average, 2008-2021).
  - There are seven H&L/pot vessels in this group that depend on the fishery for more than 80 percent of their total revenue for all fisheries (2008-2021).
- The annual average additional revenue opportunity for H&L/pot CVs ≤56' LOA is \$1.15 million under Alternative 2 (Table 4-7).
  - Of the 33 H&L/pot vessels in this size group, the Federal BSAI Pacific cod fishery contributes less than 10 percent of the total revenue for 24 vessels (2008-2021).



## 4.3.6 DHS STATE WATERS POT FISHERY

- Under Alternative 2/PPA, the BOF would need to address the trigger for opening the DHS pot fishery.
  - It is uncertain what action the BOF would take to open the DHS pot fishery.
    - The BOF could choose the new small vessel sector closing date, the redefined <60' H&L/pot CV sector closing date, or some other trigger (e.g., hard date).
      - If the BOF chose to use a sector's closure date as the trigger, there would likely be negative impacts for those vessels that do not operate in the trigger sector.
- 11 pot vessels ≤56' have participated in the Federal BSAI Pacific cod fishery and five have also participated in the DHS State waters fishery (2014-2021).
  - For these five vessels, the DHS State waters fishery has contributed \$1.51 million in annual average ex-vessel revenue (2014-2021).
- 42 pot vessels >56' LOA have participated in the Federal BSAI Pacific cod fishery and 38 have also participated in the DHS State waters fishery (2014-2021).
  - For these 38 vessels, the DHS State waters fishery has contributed \$7.27 million in annual average ex-vessel revenue (2014-2021).



# 4.3.7 SUBOPTION - B SEASON AS JIG ONLY FISHERY

- There are no anticipated impacts of including the suboption
- Jig deliveries are concentrated in the B season
- H&L/pot CV deliveries are concentrated in the A and C seasons

**Table 4-9 Count of BSAI Pacific cod deliveries, the average number of deliveries, and the percent of total deliveries made by vessels operating in the BSAI Pacific cod less than 60' H&L or pot CV and jig sectors in each jig sector trimester from 2008 through 2021**

	Season	Count of deliveries	Average number of deliveries	% of total deliveries
<b>Jig</b>	A (Jan 1 - Apr 30)	14	1	3%
	B (Apr 30 – Aug 31)	373	27	87%
	C (Aug 31 - Dec 31)	43	3	10%
<b>&lt;60' H&amp;L /pot</b>	A (Jan 1 - Apr 30)	2,618	187	66%
	B (Apr 30 – Aug 31)	113	8	3%
	C (Aug 31 - Dec 31)	1,261	90	31%





# 4.4 SUMMARY OF IMPACTS ON FISHING ACTIVITY

Category	Option 1	Option 2	Suboption
Fishing location	Not likely to change fishing location. This is outside of the scope of the action.		
Timing and Effort	Minimally redistribute effort and modify timing relative to the overall BSAI Pacific cod fishery. H&L and pot vessels in the new small vessel sector would fish seasonal allocations instead of an annual allocation (Section 4.3.2 and Section 4.3.3). Timing and frequency of reallocations would change under this action for the redefined less than 60' H&L or pot CV sector (Section 4.3.3).		No anticipated impacts, may closely mirror historical fishing activity of both sectors (Section 4.3.7).
Authorized Gear Types	No changes to authorized gear types. H&L, pot, and jig gear are authorized under the BSAI Groundfish FMP. Additionally, Federal BSAI Pacific cod sectors are defined by gear type, operation type, and vessel size categories (Section 3.2 and 3.6).		
Harvest Levels	No changes to harvest levels. The BSAI Pacific cod TAC is set in accordance with the Pacific cod biomass (Section 3.2).		



# Section 5: Monitoring and Enforcement Considerations

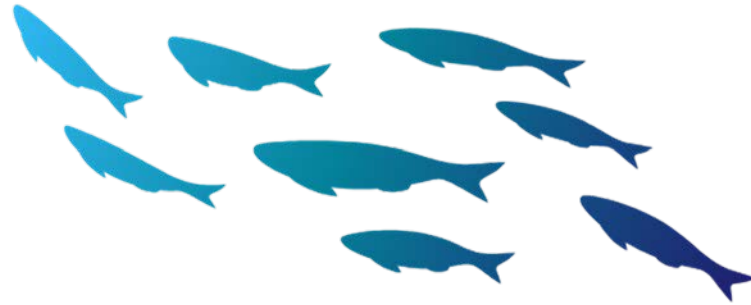
## **Implementation –**

- Revisions to regulations to modify naming conventions
- Include new small vessel sector in the annual harvest specifications process for ICA calculations
- Vessels would be placed into redefined sectors based on the LOA reported to NMFS on the FFP

## **Growth period following implementation –**

- Inseason management, outreach, enforcement
- Uncertainty with reallocation timing will decrease over time





Questions?

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Thank you!

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