

D6 Discussion Paper: IFQ Eligibility Criteria

April 2019

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Background

- Council meeting (Oct 2017)
 - Requested proposals to IFQ Committee regarding access to fishery participation, entry-level opportunities, rural communities, and the program's objective of maintaining an owner-operated fleet
- IFQ Committee meeting (Feb 2018)
- Council requested discussion papers
 - Eligibility Criteria
 - Access Opportunities- Global Examples (June 2019)
 - Hired Masters (not yet scheduled)
 - QS Transfer Mechanisms (not yet scheduled)

February 2018 Council Motion

Problem

“Some quota share holders hiring a vessel and crew to harvest their IFQ while they are onboard but not actively participating”

- Inconsistent with objective of owner-operated fleet
- Uneven distribution of rents between the “walk-on” and vessel
- Exacerbating lack of access for second generation fishermen and new entrants

February 2018 Council Motion

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Proposal

Explore eligibility requirement based on *recent* participation in any US commercial fishery



- 30, 60, or 90 days over fixed 3 or 5 year period
- Applies to prospective and existing quota share holders

Current Eligibility Requirements

Transfer Eligibility Certificate (TEC)

- 150 days as harvesting crew
- Any US commercial fishery
- Any time period
- Self-reported, reference required
- Public notary

Revised: 01/29/2018 OMB Control No. 0648-0272 Expiration Date: 06/30/2021

 <p>APPLICATION FOR ELIGIBILITY TO RECEIVE QS/IFQ</p>	<p>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</p> 
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Those persons applying to receive Quota Share (QS) or Individual Fishing Quota (IFQ) by transfer must submit this application to the Regional Administrator, to obtain a Transfer Eligibility Certificate (TEC).

BLOCK C - COMMERCIAL FISHING EXPERIENCE <i>Duplicate this section, or attach a separate sheet of paper, if necessary, to display all of the Applicant's commercial fishing experience.</i>		
1. Species (one per block):	2. Gear:	3. Location:
4. Date From (MM / YY):	5. Date To (MM / YY):	6. Number of Actual Days Spent Harvesting Fish:
7. Duties Performed While Directly Involved in the Harvesting of Fish (Be Specific):		
8. Vessel Name:		9. ADF&G or USCG Number:
10. Vessel Owner:	11. Vessel Operator:	
12. Reference Name (person other than yourself):	13. Reference's Relationship to You:	
	14. Reference's Business Telephone Number:	
15. Reference's Business Mailing Address:		

Outstanding Decision Points

- Future eligibility requirements (after qualifying years)
- Procedure if fail to meet eligibility
- Scope of eligibility requirements
 - Individuals leasing IFQ
 - Non-individual QS holders

Ability to Achieve Objective

- *Could* incentivize active fishing or quota sales
- Self-reported sea days/activity
- Qualifying years in future allow strategic behavior
- Difficult to enforce specific activity while onboard a vessel
- Limiting QS holder onboard but not participating vs. not onboard

Potential Impacts

Increase active fishing days

- Safety issues
- Displaced crew

Relinquish/transfer quota

- Loss of fishing identity
- Financial impact
- Impact to entire operation
- More active QS market, ↑ supply/entry opportunities, price changes

Hold latent quota

- Revoked?
- Consolidate QS pool

Data Limitations

Not tracked

- Individual's participation across fisheries
- Every individual on a fishing vessel
- Individual's activities while on vessel

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Tracked

- “Delivered by individual” on IFQ trips
 - IFQ holder landing their own IFQ
 - Hired master landing IFQ

Potential Impacts

Table 2. Percent of IFQ participants listed as a delivered by individual on at least one trip whose total sea days on those trips fall under each sea day recency threshold.⁷

		5 years (2014-18)				3 years (2016-2018)			
		# of Individuals	30 days	60 days	90 days	# of Individuals	30 days	60 days	90 days
Total		2,386	46%	24%	15%	2,092	35%	16%	9%
Species landed	halibut	2,225	44%	20%	11%	1,942	31%	11%	5%
	sablefish	733	60%	37%	25%	646	51%	29%	18%
Quota delivered by Hired Master	Yes	518	54%	36%	24%	392	52%	31%	18%
	No	2,102	41%	17%	8%	1,881	27%	8%	3%
	Both	273	48%	25%	15%	231	37%	16%	9%
Initial Issuee	Yes	841	45%	22%	12%	735	31%	11%	5%
	No	1,545	47%	25%	17%	1,357	37%	18%	11%
Vessel Owner	Yes	152	53%	38%	24%	115	43%	23%	10%
	Unknown	2,354	45%	23%	14%	2,071	33%	15%	8%
Quota Share	<5,000	1,310	27%	9%	5%	1,078	17%	7%	3%
	5,000-10,000	431	58%	27%	15%	394	38%	11%	5%
	>10,000	645	87%	69%	56%	620	78%	54%	41%

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

Potential Impacts

- Distribution of days for “delivered by individual” on IFQ trips (Figures 1-5)

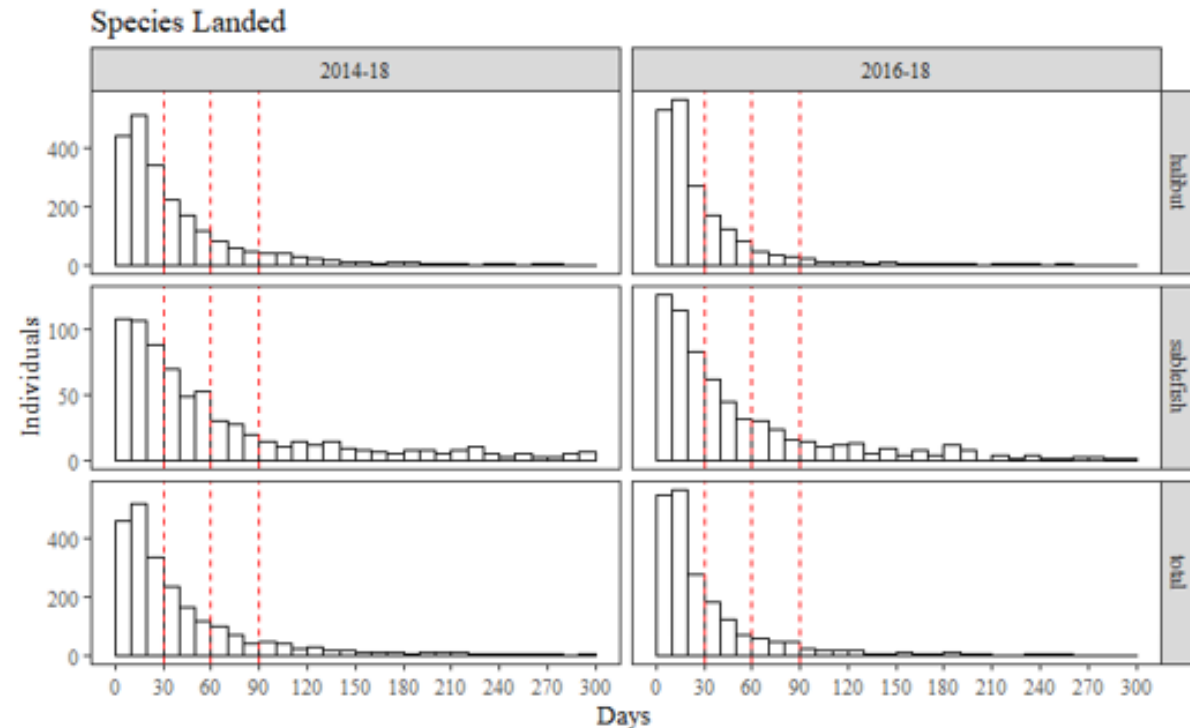
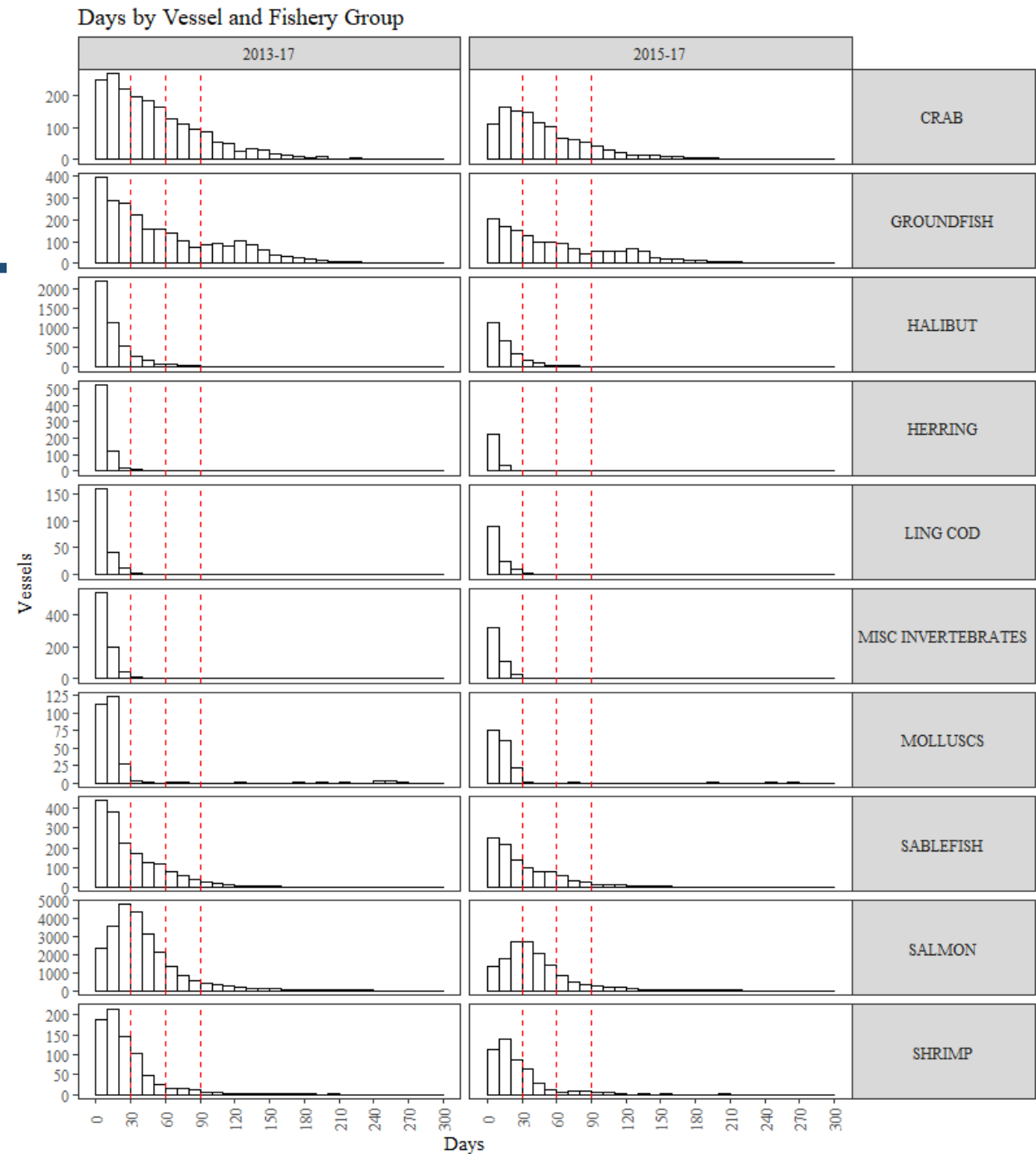


Figure 1. Days fished by individual listed as "delivered by individual" on IFQ trips 2014-2018 and 2016-2018 total and by IFQ species landed (note different y-axis).⁸

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

Potential Impacts

- Landings in which a vessel was identified for all fisheries in Alaska (Figures 6-8)



Next Steps

Clarification needed

- Scope of eligibility requirements
- Future eligibility requirements
- Procedure for failure to meet eligibility requirements
- Objective of the action
 - QS holder onboard but not active
 - QS holder not onboard