

# **Draft SSC Report June 2022**



## **C2 Pacific Cod Small Boat Access Initial Review**

## C2 Pacific Cod Small Vessel Initial Review (1 of 5)

- The SSC *finds* the analysis sufficient to advance to final action with suggested minor revisions
- Confidentially restrictions due to the small vessel numbers made the analysis challenging:
  - Less than or equal to 55' LOA H&L or pot CVs: a low of 2 vessels participating in 2021; an average of 9 per year
  - Less than or equal to 56' LOA H&L or pot CVs: a low of 5 vessels in 2021; an average of 12 per year

## C2 Pacific Cod Small Vessel Initial Review (2 of 5)

- The SSC *notes* that:
  - Analysis of trends within vessel groups indicates that all groups have been negatively impacted in terms of catch and revenue due to cod TAC declines, but that the 56' LOA H&L or pot CVs have not been disproportionately impacted.
  - Specifically, the percentage of the allocation landed by the 56' LOA vessels, including a typical annual reallocation from the jig sector, has not been decreasing over time.

## C2 Pacific Cod Small Vessel Initial Review (3 of 5)

- The purpose and need statement describes the motivation for this change as about entry, competition, and attenuating an ensuing race-to-fish.
- The SSC **encourages** that the analysts explore the extent to which seasons are shortening and for evidence of a race-to-fish, as there is currently no evidence presented that the percentage of the allocation fished by  $\leq 56'$  LOA H&L or pot CVs is decreasing over time

## C2 Pacific Cod Small Vessel Initial Review (4 of 5)

- The SSC *recommends* minor revisions to:
  - Emphasize the potential distributional impacts, including that in practice this is a reallocation of catch from large to small vessels:
    - Under Alternative 2, the group of 56'-60' LOA H&L or pot vessels is estimated to lose 22% of their historic average revenue;
    - The  $\leq 56'$  LOA H&L or pot vessels are estimated to have an opportunity to almost double (a 98% increase based on \$1.08/1.10 million) their historic average annual revenue
  - Adding language to emphasize the difficulty of predicting responses post-management change and the inherent behavioral assumptions associated with the numbers currently presented
  - Explore additional information related to the community of those likely to be impacted

## C2 Pacific Cod Small Vessel Initial Review (5 of 5)

- The SSC *suggests* the following long-term potential outcomes be acknowledged in the document:
  - Substantial changes to opportunities associated with LLP licenses could reduce the value of the licenses directly affected, but also create uncertainty and undermine other LLP values
  - Frequent regulation changes related to length could deter more specialized capital investments
  - If Pacific cod stocks recover and jig sector participation would increase in the absence of this program, the sector could be negatively impacted if they would need to compete with H&L or pot vessels