

Program and Allocation Review Workplan

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1 Introduction

With the passage of the revised Magnuson-Stevens Fishery Conservation and Management Act (MSA) in 2007, which requires a catch share program review 5 years after implementation and then every 7 years thereafter, combined with the July 2016 NOAA Fisheries requirement to complete fisheries allocation reviews, the Council workload preparing and reviewing these program and allocation reviews has become challenging (See Table 1 for the existing schedule of program and allocation reviews). To address this increasing Council workload, staff has prepared a proposed workplan for program and allocation reviews that will result in a more efficient process in preparing and presenting program and allocation reviews while still meeting the program and allocation review requirements. As background material, this workplan provides a summary of the program and allocation review requirements and guidance along with a table summarizing objectives of each of the Council’s catch share programs and allocations. Finally, the workplan provides an approach for addressing the scheduled program and allocation reviews by using program reviews where appropriate, for meeting the allocation review requirements. The remaining allocation reviews could be conducted using approved dashboard metrics that are maintained by AKFIN and summarized every 10 years as reports to the fleet via the Council B reports. Additionally, the proposed workplan recommends that each catch share program review include a workplan prior to preparing the review in order to allow for stakeholder, SSC, AP, and Council input.

Table 1 Current program and allocation review schedule

Allocation	Type of Review	Date Last Review ¹	Date of Next Scheduled Review ¹
American Fisheries Act (LAPP)	Program/Allocation	2017	2024
BSAI Crab Rationalization (LAPP)	Program/Allocation	2016	2023
Amendment 80 (LAPP)	Program/Allocation	2014	2022/2023
Halibut / Sablefish IFQ (LAPP)	Program/Allocation	2016	2023
Central Gulf of Alaska Rockfish (LAPP)	Program/Allocation	2017	2024
Aleutian Islands Pollock (LAPP) ²	Program/Allocation	2017	2024
BSAI Pacific Cod Trawl CV (LAPP)	Program/Allocation	Scheduled for 2024 Implementation	2029
GOA Pacific Cod Sector Allocation	Allocation	Am 83 was implemented in 2012	2023
BSAI Pacific Cod Sector Allocation	Allocation	2019	2029
Halibut Catch Sharing Plan	Allocation	2022	2032

¹Program reviews are 5yrs upon implementation of program and 7yrs thereafter while allocation reviews are every 10 yrs.

²Since there is currently no AI Pollock fishery, the AFA Program Review provides a summary of the initial allocation and any developments in the fishery.

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2 Program Review Requirement

To ensure the effectiveness of Council catch share programs, MSA Section 303A requires monitoring measures, including regular reporting and evaluation of program performance in meeting the goals of the program and MSA, and as necessary modification of the program to meet those goals, with a formal and detailed review 5 years after the implementation of the program and thereafter to coincide with scheduled Council review of the relevant fishery management plan (but no less frequently than once every 7 years.) Catch share programs must include provisions for monitoring catch, bycatch, and other impacts on the fishery and ecosystem.

To assist in preparing a program review, NMFS issued a [Catch Share Policy 01-121-01²](#), which provides a comprehensive and targeted approach to conducting regular reviews of Catch Share Programs (CSPs) established by the Regional Fishery Management Councils or the Secretary of Commerce. Tables 1 and 2 provide a list of Council catch share programs, which are noted as program reviews in the tables. The goal of the NMFS guidance is to ensure the reviews meet statutory requirements, are coordinated with stakeholders, transparent, efficient and effective, and conducted using consistent standards across the country. The initial review should be initiated no later than 5 years after the program's implementation and should occur no less frequently than once every 7 years thereafter. The guidance applies to all catch share programs and limited access permit programs (LAPPs), including those established before January 12, 2007.

This program review guidance outlines the general approach, scope, and use of standardized approaches for the 5/7-year review. The review should compare and analyze the fishery before and after the program's implementation and should use best available scientific information. The review should contain these eight elements:

- purpose and need of the review
- goals and objectives of the program
- history of management
- description of the biological, ecological/environmental, economic, social, and administrative environments before and since program implementation
- analysis of program effects
- evaluation of program performance with respect to goals and objectives
- summary of unexpected effects, and
- identification of program issues and need for additional data collection and research.

The review should assess the program's effects on net benefits to the nation and should consider changes in economic impacts at the regional, state, and community level. **The review should not be restricted to a specific length and should provide sufficient background information to understand the analyses contained in the review (author added emphasis).**

The scope of the review should be as comprehensive as possible given the available data and resources. It is important to consider the interdependencies between related fisheries and the spillover effects they may have. In such cases, it is best to analyze the entire operation and not just the portion within the program's boundaries. The review should make use of standardized performance indicators or metrics developed at the national level, including biological, economic, and social indicators. If sufficient data is not available, a qualitative assessment is acceptable.

The 5/7 year review aims to evaluate the program's performance in meeting its goals and objectives, as outlined in the MSA. The review will analyze the following areas: 1) goals and objectives, 2) allocations, 3) eligibility, 4) transferability, 5) catch and sustainability, 6) accumulation limits/caps, 7) cost recovery, 8) data collection/reporting, monitoring, and enforcement, 9) duration, 10) new entrants, and 11) auctions

² NMFS Catch Share Policy 01-121-01 guidance for catch share program reviews is up for review in December 2023.

and royalties. If a component is determined to be not applicable, the Council should document its rationale for not conducting a formal analysis of that component. If a component is already the subject of a management action, a summary of the description, rationale, and current status of the action will be sufficient.

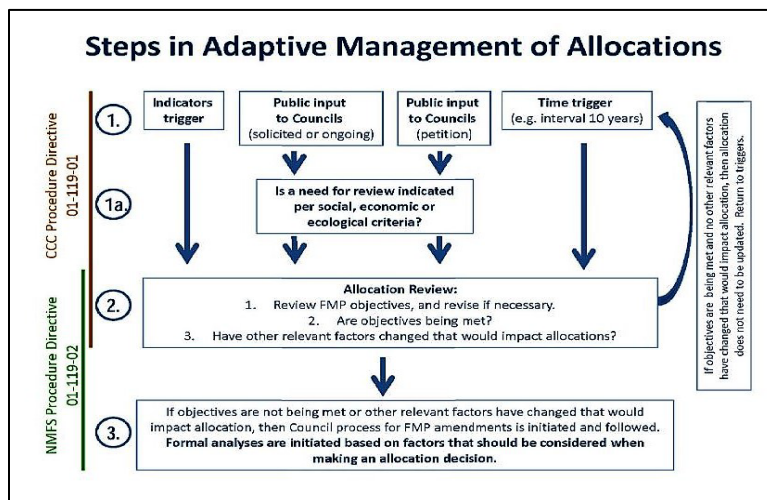
Workplans for Program Reviews

Typically, Council staff prepares a workplan for a program review which is then presented to the SSC, AP, and Council. The objective of the workplan is to describe the proposed scope of the program review and to serve as a starting point for a discussion of what should be included in the review. In general, the public has testified concerning the program review workplans, and the SSC, AP, and the Council have in the past provided inputs into the program review workplans. Providing the program review workplan to the SSC, AP, and Council has provided transparency in preparing program reviews and has allowed the public to request additional information be included in the review through the Council process. As noted by the SSC during the April 2017 meeting, programmatic reviews are critical for evaluating the extent to which the objectives of a program have been met, and whether the program has resulted in any unintended and/or unforeseen negative consequences. In evaluating workplans, the SSC has made extensive comments in regard to these reviews that are highly relevant to the program reviews. As noted during the October 2017 Council meeting, the SSC feels that its input into the workplans contributed to the quality and accessibility of the analysis, and recommends SSC evaluation of program review workplans be standard practice.

3 Allocation Review Requirement

In July 2016, NMFS issued a [Fisheries Allocation Policy Directive 01-119](#)³, which describes a mechanism to ensure fisheries allocations are periodically evaluated to ensure that OY is being achieved under current conditions. Allocation is defined by NOAA Fisheries as “a direct and deliberate distribution of the opportunity to participate in a fishery among identifiable, discrete user groups or individuals.” Allocation of fishery resources is challenging because of the economic value, history, and tradition associated with access to fishery resources and the perceptions of fairness that arise with allocation decisions. Allocation can be across jurisdictions (international, state, regional, etc.), across sectors (commercial, recreational, tribal, research, etc.), and within sectors (individual fishermen, gear types, etc.).

The directives establish three steps in an allocation review process, depicted in the infographic and described in detail below:



³ These policy directives are scheduled for review on October 1, 2023.

- Step One:** A trigger is met. There are three main categories of triggers: public input, time, or indicator based. For example, a significant change in landings (e.g., an increase/decrease greater than one to two standard deviations within a three-year timeframe, etc.) may be identified as an indicator based trigger for initiating a review of an allocation decision. Triggers are discussed in more detail in the CCC trigger document ([Procedural Directive 01-119-01](#)). If the trigger is indicator-based, or time-based, then proceed immediately to step 2: fisheries allocation review. If the trigger is based on public input to the Councils, then a check for changes in social, ecological, or economic criteria is required (step 1a in Figure 1) to ensure assessment of the fisheries allocation is an appropriate use of Council resources. At this stage, in depth analyses are not required.
- Step Two:** Fisheries Allocation Review. Councils should complete a review of the fisheries allocation in question. This review will assist the Councils in determining whether or not the development and evaluation of allocation options is warranted, and is not, in and of itself, a trigger to initiate an FMP amendment (or framework adjustment, if appropriate) to consider alternative allocations. This step is discussed in more detail in the CCC triggers document ([Procedural Directive 01-119-01](#)) and overlaps with the NMFS fisheries allocation factors document (Procedural Directive 01-119-02). The review should consider the FMP objectives along with other relevant factors that have changed and may be important to the fisheries allocation. Relevant factors are described in the NMFS fisheries allocation factors document (Procedural Directive 01-119-02). **At this stage, in depth analyses are not required; however, to ensure transparency, a clear articulation of how the objectives are or are not being met, and a clear rationale on relevant factors considered should be included in the record (author added emphasis).** This fisheries allocation review informs whether or not a consideration of new allocation alternatives is warranted.
- Step Three:** Evaluation of Fisheries Allocation Options for an FMP amendment. Based on step two, if a Council decides that development of allocation options is warranted, a Council will proceed with formal analyses, and follow its amendment process for identifying alternatives, soliciting public input, etc. If the Council determines that the FMP objectives are not up-to-date, then the Council should discuss, evaluate, and if necessary, revise the objectives. During the identification of alternatives, Councils should consider the factors in the Procedural Directive 01-119-02. All the factors do not need to be analyzed for each fisheries allocation decision. If a factor is not relevant for a given decision, no formal analysis for that factor is needed; however, the record should clearly document the rationale for that determination.

In June 2017, the Council reviewed a [discussion paper](#) describing the new requirements for triggering an allocation review. Potential trigger approaches were examined and a list of allocations meeting the definition were developed. The Council identified four non-LAPP allocations (the Halibut Catch Sharing Plan, the GOA and BSAI Pacific cod allocations, and the AI pollock allocation) and the current Council LAPP reviews, that when completed, would satisfy the allocation review requirement (see Table 1). The Council adopted a 10-year time frame as the primary trigger criteria for review of non-LAPP allocations, and the existing Council public input process as the secondary trigger criteria for review.

Council's Approach to Allocation Reviews

Since adoption of the allocation review requirements by the Council during the June 2017 meeting, the Council has completed three allocation reviews. Initially, there was some confusion surrounding what level of analysis was necessary for an allocation review. Following that initial confusion, NOAA Fisheries provided clarity on the amount of analysis necessary for step two allocation review, which is not meant to be an in-depth analysis. As a result of this additional guidance from NOAA Fisheries, the Council developed dashboards to address allocation requirements for non-LAPP allocations. Provided

below is a description of the Council's initial phase of the allocation review process (step two) along with the development of the dashboard approach in meeting the allocation requirement for non-LAPP allocations.

The first allocation review completed by the Council was in association with the [2017 CGOA Rockfish Cooperative Program review](#). In that program review, chapter 18 provided a brief allocation review to assist the Council in determining whether or not the development and evaluation of allocation options is warranted. The allocation review included sections on stated program objectives, ecological, economic, and social factors. As noted in the October 2017 SSC minutes, the CGOA Rockfish allocation review is a straightforward approach for most allocations, but it is also recognized that some future required allocation reviews, such as that for halibut, will be more complex and will benefit from a clear and well-thought-out allocation review process. During its review of the CGOA Rockfish allocation review, the SSC recommended that the allocation review be severed from the program review pending further guidance from the Council on what level of analysis is required in step two of an allocation review.

Additionally, during their review of the CGOA Rockfish allocation review, the SSC raised the need for clarity on the policy question and standard for analysis in the Allocation Review. At the time, the SSC was unsure of the scope of the review, as it was not clear whether the policy alternative is a reallocation of QS within the CGOA Rockfish Program or reallocation of TACs across multiple fisheries. The NMFS allocation review guidance provides guidance on factors to consider in evaluating allocation to a group but does not provide specific measures. At that time, the SSC recommended the Council develop a standard baseline set of metrics to apply to all Allocation Reviews. If the scope of the review is within a particular LAPP, the content of LAPP reviews can be used as a source for these measures. If the scope is to evaluate allocation of stock-specific TACs across multiple programs and user groups, a uniform set of measures should be used to compare the benefits provided to the nation by different "identifiable user groups". The SSC suggested considering measures such as allocation size, revenue, ecological fishing impact, protected species impact, participation, and community impact in localities. **The SSC minutes point to the use of two different approaches for addressing allocation review requirements: 1) the scope of the allocation review is within the particular LAPP, the program review would be sufficient to satisfy the allocation review requirement, 2) for those allocation reviews that are stock specific TACs across multiple programs or user groups, a separate allocation review would be needed to satisfy the allocation review requirement.**

Recognizing that stock specific TAC allocations across multiple programs or user groups reviews would be necessary to satisfy the allocation review requirements, the May 2018 Council Coordination Committee (CCC) meeting had a discussion on what constitutes an allocation review (step two) because there was an apparent ambiguity in the directive. Following that CCC meeting, NOAA Fisheries provided further guidance that the allocation review is not meant to include in-depth analysis. It should assess if the FMP objectives are being met (assuming they are relevant and current) and discuss if other relevant factors (ecological, economic, social, catch, status, etc.) have changed enough to warrant an in-depth formal analysis of the allocation (step three). If the objectives have been met and an initial analysis, which can be qualitative, suggest no major changes have occurred, then the allocation review is complete, and the time trigger under step 1 is reset for that fishery allocation. If the objectives are not being met and/or the initial analysis suggests major changes may have occurred, then the standard Council process for FMP amendments (i.e., a reallocation action) is initiated. It is during step three that the in-depth analysis is required.⁴

Following the clarification by NOAA Fisheries on step two, the Council was able to narrow in on an allocation review approach for those allocations that are stock specific TACs across multiple programs or

⁴ Given this initial confusion surrounding what constitutes an allocation review (step two), and the scheduled October 1, 2023, review of the allocation review policy directive by NOAA Fisheries, the Council could recommend NOAA Fisheries provide additional language in the allocation review (step two) portion of the guidance to remove any ambiguity on what is required for this step.

user groups (listed as allocation only reviews in Tables 1 and 2). During the December 2018 Council meeting, the SSC reviewed the [BSAI Pacific cod allocation review workplan](#), which was the first allocation review that was not in parallel with a program review. Recognizing that additional guidance, the SSC recommended that the allocation review be approached as an exercise in developing dashboard indicators, separately tracked for each group; indicator sets for each group will reflect the primary mechanisms by which the group uses the allocations to obtain the goals of the FMP. The SSC noted that the burden of developing the allocation review using this approach may then be minimized by building the balance of the report around 1) presenting the methods, data, and general management measures necessary to explain how the dashboard measures were developed and 2) interpreting indicator performance levels relative to the FMP goals.

In developing the variables used to assess how each group contributes to FMP objectives, the SSC suggested evaluating specific measures of the size of the allocation; allocation utilization rates (and variation); revenue from catching the allocation; revenue from catching jointly harvested species; the number of vessels; number of vessel owners; and number of US and foreign crew members. Further, measures of ecological fishing impacts (which may vary with gear impact or age-length profiles targeted; protected species interactions) and impacts on substantially engaged or dependent communities need to be developed. AFSC's ongoing community and economic time series indicators may be a useful source in identifying readily available data reflecting both fishery group effects, and overall regional trends.

As noted in the June 2019 SSC minutes, the SSC reviewed the [final BSAI Pacific cod Allocation Review](#) and noted that the use of dashboards as a method for addressing a range of challenges in selecting and presenting indicators in ways that are useful and insightful in describing the fleet(s) derive benefits and are dependence on the allocation can be useful and effective in determining if the objectives of the allocation are being meet. See Table 3 for a list of catch share program and allocation program objectives.

Since publishing the final BSAI Pacific cod allocation review (June 22, 2019), the Alaska Fisheries Information Network (AKFIN) created and is maintaining BSAI Pacific cod dashboards for each sector (see <https://apex.psmfc.org/akfinddev/f?p=501:2500:339684777962>). These dashboards provide the same information that was included in the June 22, 2019, BSAI Pacific cod allocation review and are updated annually for access by the fisheries analysts and the public.

Recognizing the success of the dashboard approach for allocation reviews, Council staff prepared a workplan of the Amendment 80 Program review and allocation review that is scheduled for 2023/2024. To address the allocation review requirement, the workplan included a chapter that would utilize dashboards that measure and present information on the allocation of the Amendment 80 species in a format that captures useful snapshots in a straightforward and accessible way. Since presenting the Amendment 80 workplan to the Council, the allocation review portion of the program review has been removed from the workplan outline and instead will be treated as a separate allocation review using a dashboards for BSAI yellowfin sole, Atka mackerel, and Pacific ocean perch. Unlike BSAI flathead sole and rocksole which were allocated all to the Amendment 80 sector and therefore do not require a separate allocation review, BSAI yellowfin sole, BS and AI Atka mackerel, and AI POP are allocated between Amendment 80 sector and the trawl limited access sector (TLAS) and therefore require a separate allocation review. See Appendix 1 for a draft BSAI yellowfin sole allocation review that would be provided to the Council.

Finally, given the two different approaches for addressing the allocation review requirements (1-the content of the LAPP reviews is used to satisfy the allocation review and 2-separate allocation reviews using dashboards for those allocations that are stock specific TACs across multiple programs or user groups) and the progress AKFIN has made in developing dashboards for allocation reviews that are stock specific allocations across multiple programs or user groups, a revised timetable of program and allocation reviews is provided below in Table 2. The table shows where appropriate which program reviews will satisfy the allocation review requirements (approach 1) and which allocation reviews will

need to be prepared (approach 2), the primary author of the program and allocation reviews, the Council action necessary for the program and allocation reviews, and timing associated with the program and allocation reviews.

Table 2 Proposed program and allocation review timetable

LAPP/Allocation	Type of review	Primary author	Council Action	Date of last review ¹	Next scheduled review ¹	Subsequent review
American Fisheries Act (LAPP)	Program ³	Council staff	Review workplan and program review	2017	2024	2031
BSAI Crab Rationalization (LAPP)	Program ³	Council staff	Review workplan and program review	2016	2023/2024	2030
Amendment 80 (LAPP)	Program ⁵	Council staff	Review workplan and program review	2014	2022/2023	2029
Halibut / Sablefish IFQ (LAPP)	Program ³	Council staff	Review workplan and program review	2016	2023/2024	2030
Central Gulf of Alaska Rockfish (LAPP)	Program ³	Council staff	Review workplan and program review	2017	2024	2031
BSAI Pacific Cod Trawl CV (LAPP)	Program ⁴	Council staff	Review workplan and program review	Projected 2024 Implementation	2029	2039
GOA Pacific Cod Sector Allocation	Allocation	AKFIN	B Report – review report to the fleet	Am 83 was implemented in 2012	2023	2033
BSAI Pacific Cod Sector Allocation	Allocation	AKFIN	B Report – review report to the fleet	2019	2029	2039
Halibut Catch Sharing Plan	Allocation	AKFIN	B Report – review report to the fleet	2022	2032	2042
Amendment 80 YFS, AMCK, and POP Allocations ⁵	Allocation	AKFIN	B Report – review report to the fleet	2015	2025	2035
Aleutian Islands Pollock Allocation ²	Allocation	AKFIN	B Report – review report to the fleet	Currently no directed fishery, so NMFS has reallocated the projected unused amounts of the Aleut Corp.'s pollock directed fishing allowance from the AI subarea to the BS subarea.		

¹ Program reviews are 5 years upon implementation of program and 7 years thereafter while allocation reviews are every 10 years.

² Since there is currently no AI Pollock fishery, the AFA Program Review provides a summary of the initial allocation and any developments in the fishery.

³ All allocations of the species in these LAPPs were allocated only to the LAPP participants, the program review satisfies the allocation review requirement.

⁴ Allocation review requirement is satisfied by the BSAI Pacific cod allocation review.

⁵ BSAI yellowfin sole, BS and AI Atka mackerel, and AI POP were allocated between Amendment 80 sector and the trawl limited access sector. As a result, an allocation review for these three species is necessary to satisfy the allocation review requirement. For BSAI flathead sole and BSAI rock sole, these species were allocated entirely to the Amendment 80 sector and therefore the Amendment 80 Program review satisfies the allocation requirement for these species.

Table 3 Catch share program objectives and species allocation objectives

Catch Share/ Allocation Programs	Date of last review (Size of document)	Type of review	LAPP/Allocation Objectives	Subjects reviewed
BSAI AFA Program	July 2017 (192 pages)	Program Review	<p>The AFA had two primary objectives:</p> <ul style="list-style-type: none"> • To complete the process begun in 1976 to give U.S. interests a priority in the harvest of U.S. fishery resources • To significantly decapitalize the BS pollock fishery <p>Beyond the stated AFA objectives, the primary elements of the AFA:</p> <ul style="list-style-type: none"> • Require owners of U.S. flag fishing vessels comply with a 75% U.S. controlling interest standard • Prohibit on the entry of any new fishing vessels into U.S. waters that exceed 165ft registered length, 750 gross registered tons, or 3,000 shaft horsepower • Buyout nine pollock C/Ps and the subsequent scrapping of eight of these vessels • A new BSAI pollock allocation process that allocates 10% BSAI pollock to CDQ Program, and after allowance for incidental catch of pollock allocates remaining TAC to inshore processors at 50%, C/Ps at 40%, and vessels harvesting pollock for processing by motherships at 10% • A fee of six-tenths of one percent for each pound round weight of pollock harvested by CVs delivering inshore for repaying \$75 million direct loan obligation • Prohibit entry of new vessels in the BSAI pollock fishery • Increase observer coverage and scale requirements for AFA C/Ps • New standards and limitations for the creation of fishery cooperatives • Quasi-IFQ program under which NMFS grand individual allocations of the inshore BSAI pollock TAC to inshore CV cooperatives • Establish sideboards • A 17.5% excessive share harvest cap 	<ul style="list-style-type: none"> • Evolution of BS pollock fishery management • Cooperative contracts and reports • Allocation and harvest • Participation and consolidation • PSC • Excessive harvesting and processing limits • Community Development Quota Program and fishing communities • Retention and utilization • Product Types and Markets • Sideboard limits • Fishing vessel safety • Management costs and cost recovery
BSAI Amendment 80 Program	October 2014 (193 pages)	Program Review	<ul style="list-style-type: none"> • Maintain a healthy marine ecosystem to ensure the long-term conservation and abundance of the groundfish and crab resource • Reduce bycatch • Minimize waste and improve utilization to the extent practical • Provide maximum benefit to present generations of fishermen, including CDQ groups, communities, and the nation as a whole • Further rationalize the fishery as a means to mitigate costs of achieving the goals of bycatch reduction and other program objectives • Minimize negative impacts on other fisheries • Apportion the yellowfin sole fishery between the AM80 sector and the BSAI Trawl Limited Access (BSAI TLAS) sector 	<ul style="list-style-type: none"> • Use and collection of scientific data in AM80 fisheries • Rationalization and elimination of the Race for Fish • Safety • Development of modified trawl sweeps in the AM80 fisheries • Attainment of optimum yield and ability to account for variations and contingencies • Retention and utilization of harvest resources • PSC • Benefits generated • Assessment of CDQ Program allocations • Community impacts

Catch Share/ Allocation Programs	Date of last review (Size of document)	Type of review	LAPP/Allocation Objectives	Subjects reviewed
BSAI Crab Rationalization 10-Year Program Review	January 2017 (251 pages)	Program Review	<ul style="list-style-type: none"> • Promote resource conservation, utilization, and address management problems • Reduce bycatch and its' associated mortalities, and potential landing deadloss • Reduce excess harvesting and processing capacity, as well as discourage a system that promotes low economic returns • Promote economic stability for harvesters, processors, and coastal communities • Eradicate the high levels of occupational loss of life and injury • Address the social and economic concerns of communities • Promote efficiency in the harvesting sector • Promote equity between the harvesting and processing sectors, including healthy, stable, and competitive markets 	<ul style="list-style-type: none"> • Description of management • Stock status and biological indicators • Harvest share holdings • Overview of the harvest sector • Processor share holdings • Overview of the processor sector • CDQ group and Adak community group participation • Crab markets and prices • Entry opportunities • Social and economic community impacts • Management, monitoring, and enforcement • Cost recovery • Vessel safety • Sideboard limits • Economic data collection and analysis
CGOA Rockfish Program	October 2017 (131 pages)	Program Review	<ul style="list-style-type: none"> • Allow full retention of allocated species • Reduce halibut bycatch • Reduce Chinook salmon bycatch • Remove disincentives for some CPs to join cooperatives • Allow for a more rational distribution of effort • Improve NMFSs ability to conserve and manage the species in the program • Increase vessel accountability • Control capacity of the fleets • Control consolidation • Reduced trawl gear contact with the sea floor • Improve safety at sea • Stabilization of Kodiak and shorebased processing sector work force • More stable markets • More shoreside deliveries of rockfish • Additional non-rockfish deliveries with the halibut savings • Increase rockfish quality and diversity of rockfish products • Resolve Rockfish Pilot Program issues in the management and viability of the entry level fishery 	<ul style="list-style-type: none"> • History of the CGOA Rockfish fishery management • Rockfish Program duration and review • Cooperative contracts and reports • TACs, allocations, harvests, and transfers • Reductions in sea floor contact • PSC • Retention and Utilization • Products and markets • Fishery revenue • Excessive ownership and use limits • Changes in ownership • Fishing communities • Sideboard limits • Vessel safety • Impact on management agencies • Observer costs and cost recovery

Catch Share/ Allocation Programs	Date of last review (Size of document)	Type of review	LAPP/Allocation Objectives	Subjects reviewed
BSAI / GOA Halibut and Sablefish IFQ 20-Year Program Review	December 2016 (473 pages)	Program Review	<ul style="list-style-type: none"> • Address the problems that occurred with the open-access management regime to include allocation conflicts, gear conflicts, deadloss from lost gear, bycatch loss, discard mortality, excess harvesting capacity, product wholesomeness, safety, economic stability in the fisheries and communities, and rural coastal community development of a small boat fleet • Link the initial quota share (QS) allocations to recent dependence on the halibut and sablefish fixed gear fisheries • Broadly distribute QS to prevent excessively large QS holdings • Maintain the diversity in the fleet with respect to vessel categories • Maintain the existing business relationships among vessel owners, crews, and processors • Assure that those directly involved in the fishery benefit from the IFQ Program by assuring that these two fisheries are dominated by owner/operator operations • Limit the adjustment cost to current participants including Alaska coastal communities • Increase the ability of rural coastal communities adjacent to the BSAI to share in the wealth generated by the IFQ Program • Achieve previously state Council goals and objectives and meet the MSA requirements 	<ul style="list-style-type: none"> • Description of Management • Overarching trends and external impacts on IFQ participants • Initial allocation process • Harvesting flexibility, capacity, and consolidation • Crewmember and processor impacts • Owner-operated characteristic of the fleet • Entry opportunities • Community impacts • Vessel safety • Biological management • In-season management • Recordkeeping, reporting, Observer Program, monitoring & enforcement, management, and cost recovery • Native village of Eyak
BSAI Pacific cod Trawl CV (PCTC) Program	To be completed 5 years from implementation date (projected to be 2024)	Program Review	<ul style="list-style-type: none"> • Improve the prosecution of the fishery • Promote safety • Promote stability in the harvesting and processing sector • Minimize bycatch to the extent practicable • Increase the value of the fishery • Provide for the sustained participation of the fishery dependent communities • Ensure the sustainability and viability of the resource 	To be completed 5 years from implementation date
BSAI Pacific cod Allocation (AM 85)	May 2019 (65 pages)	Allocation Review	<ul style="list-style-type: none"> • Establish allocations that reflect historical use by the sectors • Consider catch history, socioeconomic, and community factors to include allocations to small boat sectors to expand entry-level and local opportunities • Reduce the need for inseason reallocations • Reduce uncertainty about the availability of yearly harvests within sectors caused by reallocations • Provide stability among sectors in the BSAI Pacific cod fishery 	<ul style="list-style-type: none"> • BSAI Pacific cod allocation objectives • BSAI FMP objectives • BSAI Pacific cod environment • Management of the BSAI Pacific fishery • Sector profiles/dashboards • Future Council action

Catch Share/ Allocation Programs	Date of last review (Size of document)	Type of review	LAPP/Allocation Objectives	Subjects reviewed
GOA Pacific cod section allocation (AM 83)	Allocation review yet to be prepared	Allocation Review	<ul style="list-style-type: none"> Enhance stability in the Western and Central GOA Pacific cod fisheries to address conservation, catch monitoring, and social objectives, including considerations for small boat sectors and coastal communities Reduce competition among sectors Preserve the historical distribution of catch among sectors Promote sustainable fishing practices Facilitate management measures 	Allocation review yet to be prepared
Halibut 2C/3A Catch Share Plan Allocation	February 2022 (86 pages)	Allocation Review	<ul style="list-style-type: none"> Create a management regime that provides separate accountability for each sector Management tools and season length should be established during the year prior to the year in which they would take effect, and that the tools selected, and season length should not change in season Evaluate its success in achieving the sport charter sector allocation and specific needs for predictability, advance notice, and season length each year, and adjust its management tools as needed Adjust management measures as needed to ensure that the sport charter sector is held at or below its allocation, recognizing that there may be annual overages or underages 	<ul style="list-style-type: none"> Allocation review background and purpose Goals of the CSP Goals of the Northern Pacific Halibut Act Pacific halibut stock and management Allocation and management established by the CSP Sector profiles/dashboards Review of program objectives Consideration of next steps
AM80 allocation of BSAI yellowfin sole, Atka mackerel, and Pacific ocean perch	Allocation review yet to be prepared	Allocation Review	<ul style="list-style-type: none"> Apportion the yellowfin sole fishery between the AM80 sector and the BSAI Trawl Limited Access (BSAI TLAS) sector to provide stability for existing fishery participants Maintain a healthy marine ecosystem to ensure the long-term conservation and abundance of the groundfish and crab resource Minimize negative impacts on other fisheries 	Allocation review yet to be prepared
AI Pollock allocation (AM 82)	Currently there is no directed fishery, so no review is scheduled	Allocation Review	<ul style="list-style-type: none"> Establishment of small boat fleet in the community of Adak Economic benefit can be gained through a direct apportionment of pollock quota to the Aleut Corporation for economic development in Adak 	Currently there is no directed fishery, so no review is scheduled

Appendix: Example Yellowfin Sole Allocation Review

Introduction

Overview

In July 2016, NMFS issued a Fisheries Allocation Policy Directive, which describes a mechanism to ensure fisheries allocations are periodically evaluated to ensure that OY is being achieved under current conditions. The Council adopted a 10-year time frame as the primary trigger criteria for review for non-LAPP allocations.

As noted in the 2018 Council Coordinating Committee meeting, the Allocation Review is not meant to include in-depth analyses. It should assess if the FMP objectives are being met (assuming they are relevant and current) and discuss if other relevant factors (ecological, economic, social, catch, status, etc.) have changed enough to warrant an in-depth formal analysis of the allocation. If the objectives have been met and initial analyses (this can be qualitative) suggest no major changes have occurred, then the allocation review is complete. If the objectives are not being met and/or initial analyses suggest major changes may have occurred, then the Council process for FMP amendments (reallocation action) is initiated.

Bering Sea and Aleutian Islands (BSAI) Fishery Management Plan allocates a portion of yellowfin sole TAC between the non-AFA trawl catcher/processor sector defined in Section 219(a)(7) of the Consolidated Appropriations Act, 2005 (P.L. 108-447) (referred to as the Amendment80 sector), and all other BSAI trawl vessels (BSAI trawl limited access sector or TLAS) after deductions for CDQ Program allocations, incidental catch amounts (except for Pacific cod), and other existing fishery allocations, (i.e., Atka mackerel jig). The amount of groundfish allocated between trawl sectors after deductions for the CDQ Program and incidental catch allowance is the initial TAC (ITAC).

A percentage of the yellowfin sole ITAC is allocated among the trawl sectors depending on the total ITAC. Table 1 below represents the percent of the ITAC allocated between sectors that corresponds to the amount of yellowfin sole ITAC.

Table 1. Yellowfin Sole Sector Allocation

ITAC (tons)	Amendment 80	TLAS
<=87,500	93.0%	7.0%
87,500-95,000	87.5%	12.5%
95,000-102,500	82.0%	18.0%
102,500-110,000	76.5%	23.5%
110,000-117,500	71.0%	29.0%
117,500-125,000	65.5%	34.5%
>125,000	60.0%	40.0%

Regulatory Changes

A list of regulatory amendments affecting the allocation is available on the Federal Register website at: <https://www.federalregister.gov/agencies/national-oceanic-and-atmospheric-administration>. Rules affecting the yellowfin sole allocation that became effective between 2012 and 2022 are summarized below.

Limiting Access for Offshore Trawl CVs in the BSAI Trawl Limited Access Yellowfin Sole Fishery:

NOAA Fisheries issued regulations on October 4th, 2018 to implement Amendment 116 to the Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area (FMP). Amendment 116 limits access to the Bering Sea and Aleutian Islands (BSAI) Trawl Limited Access Sector (TLAS) yellowfin sole directed fishery by vessels that deliver their catch of yellowfin sole to motherships for processing. This final rule established eligibility criteria based on historical participation in the BSAI TLAS yellowfin sole directed fishery, issued an endorsement to those groundfish License Limitation Program (LLP) licenses that meet the eligibility criteria, and authorized delivery of BSAI TLAS yellowfin sole to motherships by only those vessels designated on a groundfish LLP license that is endorsed for the BSAI TLAS yellowfin sole directed fishery

This action was necessary to prevent increased catcher vessel (CV) participation from reducing the benefits the fishery provides to historic and recent participants, mitigate the risk that a "race for fish" could develop, and help to maintain the consistently low rates of halibut bycatch in the BSAI TLAS yellowfin sole directed fishery. This rule was effective November 5, 2018.

Yellowfin Sole Harvest

Allocation and Landings

The following figures represent the participation and harvest of yellowfin sole. The TLAS sector figures are not yet available. These TLAS sector figures will be provided in the future yellowfin allocation review. The initial allocation, final allocation and percent of the allocation harvested are represented for the A80 sector in figure 2.10. Figure 2,12 shows that the number of Amendment 80 vessels targeting yellowfin has varied between 19 and 20 since 2015. The percent of Amendment 80 yellowfin sole TAC harvested hit a 10 year low in 2021 of 63%. and increased to 76% in 2022. Both years represent the least percentage of TAC harvested in the 10-year timeframe. The decreased TAC utilization coincides with increased TAC, 2021 and 2022 were the top two TACs in the 10-year timeframe. Harvest of yellowfin sole by the Amendment 80 sector reached an all-time high in 2022 of 127,012 metric tons.

Figure 1. Amendment 80 Yellowfin Sole Allocation and percent of ITAC Landed, 2013-2022

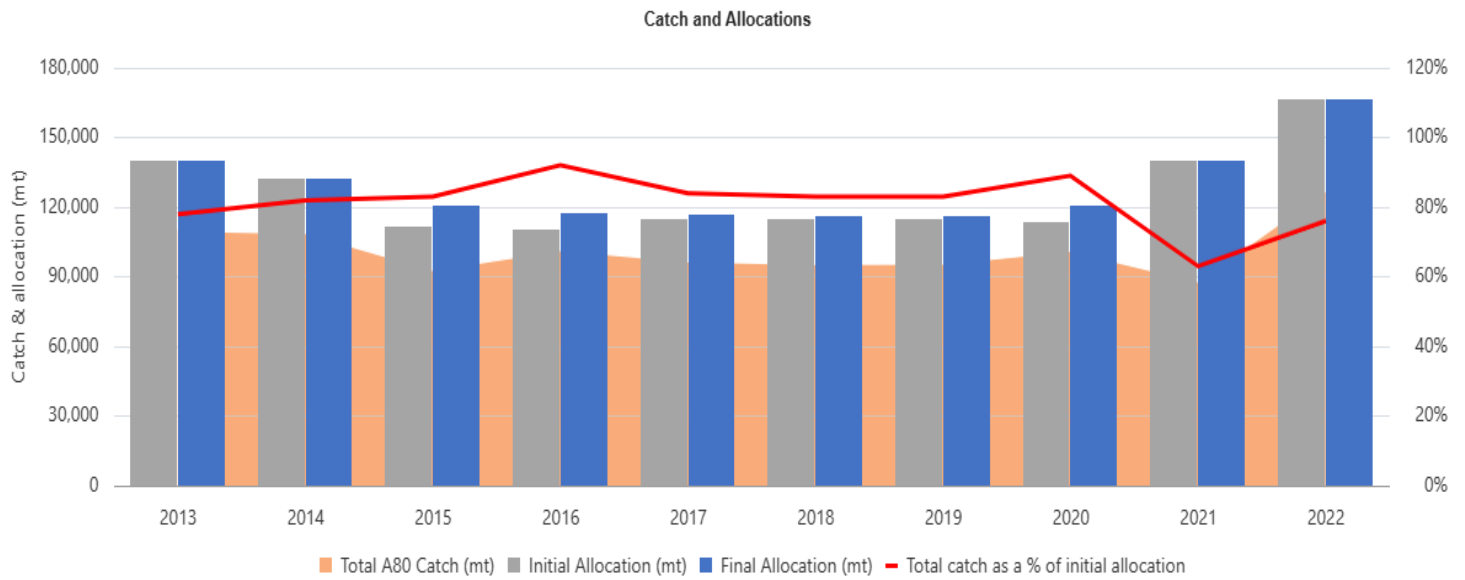
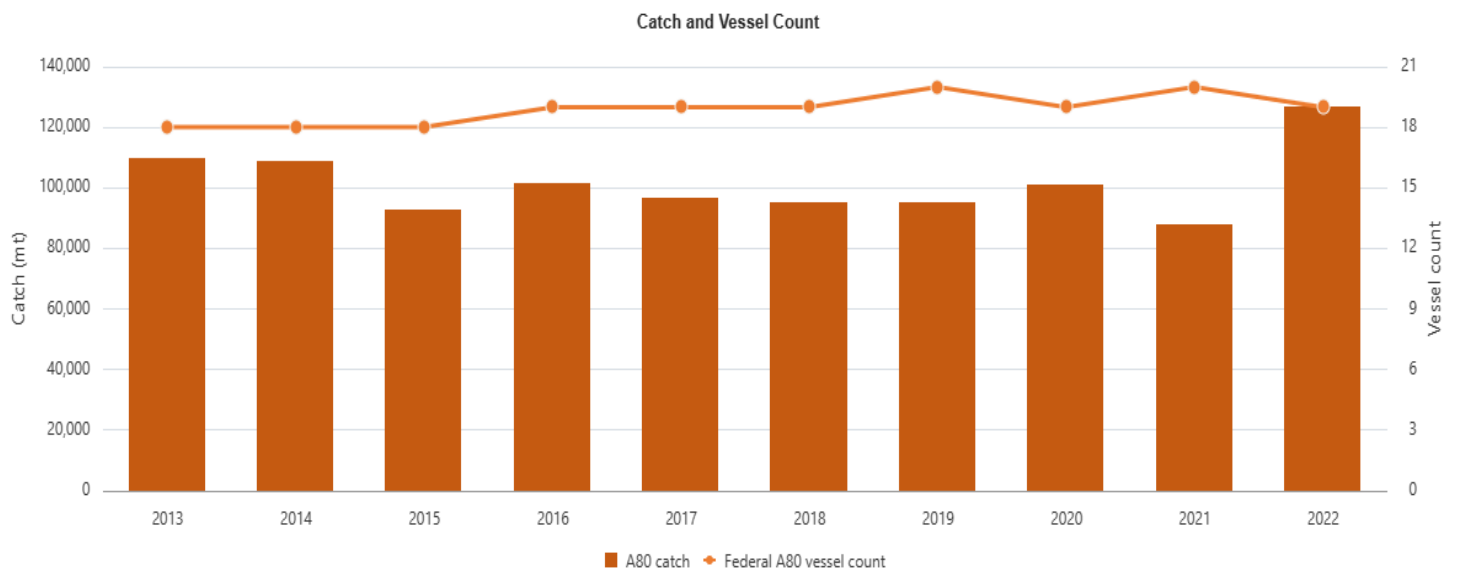


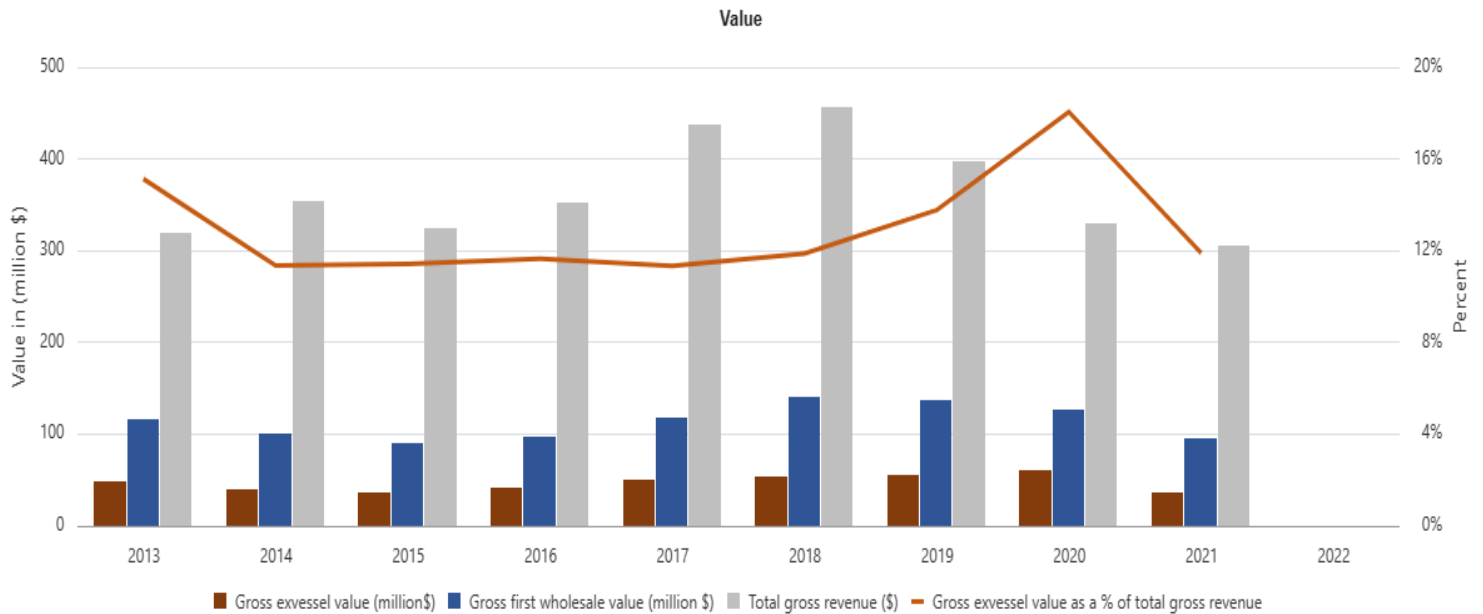
Figure 2. Amendment 80 Vessels Targeting Yellowfin Sole Allocation and Total Catch, 2013-2022



Value

The following figures represent the value and vessel dependence associated with the yellowfin sole allocation, 2022 data is currently not available. The TLAS figures are not available at this time. These TLAS sector figures will be provided in the future yellowfin allocation review. Yellowfin sole represented between 12-16% of the participating vessels' total revenue for all years in the 10-year timeframe except 2020 when the percent of revenue reached 18%.

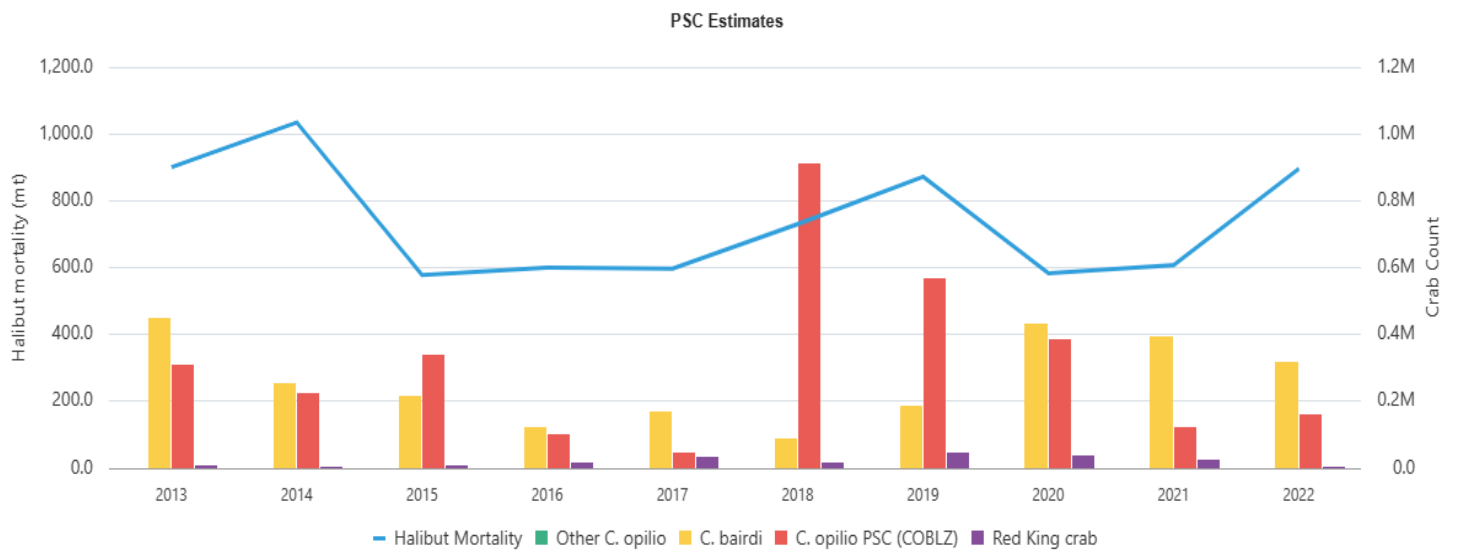
Figure 3. Amendment 80 Vessels' Estimated Value of Yellowfin Sole, Yellowfin Sole as a Percent of Revenue and Total Estimated Vessel Revenue, 2013-2022.



Prohibited Species Catch (PSC)

The trawl PSC limit for halibut, Zone 1 red king crab, *C. opilio* crab PSC (COBLZ), Zone 1 *C. bairdi* crab PSC, and Zone 2 *C. bairdi* crab PSC is apportioned between the non-AFA trawl CP (Amendment 80) sector and the BSAI TLAS. The TLAS sector figures are not yet available. These TLAS sector figures will be provided in the future yellowfin allocation review. Halibut PSC is currently divided between the Amendment 80 sector and the BSAI trawl limited access sector at 1,745 mt to 745 mt respectively. The crab PSC apportionments vary by species. The yellowfin sole allocation does not have a designated PSC apportionment within each sector, the overall sector allowance is managed by each sector when harvesting the yellowfin sole TAC.

Figure 4. Amendment 80 Vessels' PSC Estimates of Halibut and Crab in the Yellowfin Sole Target, 2013-2022.

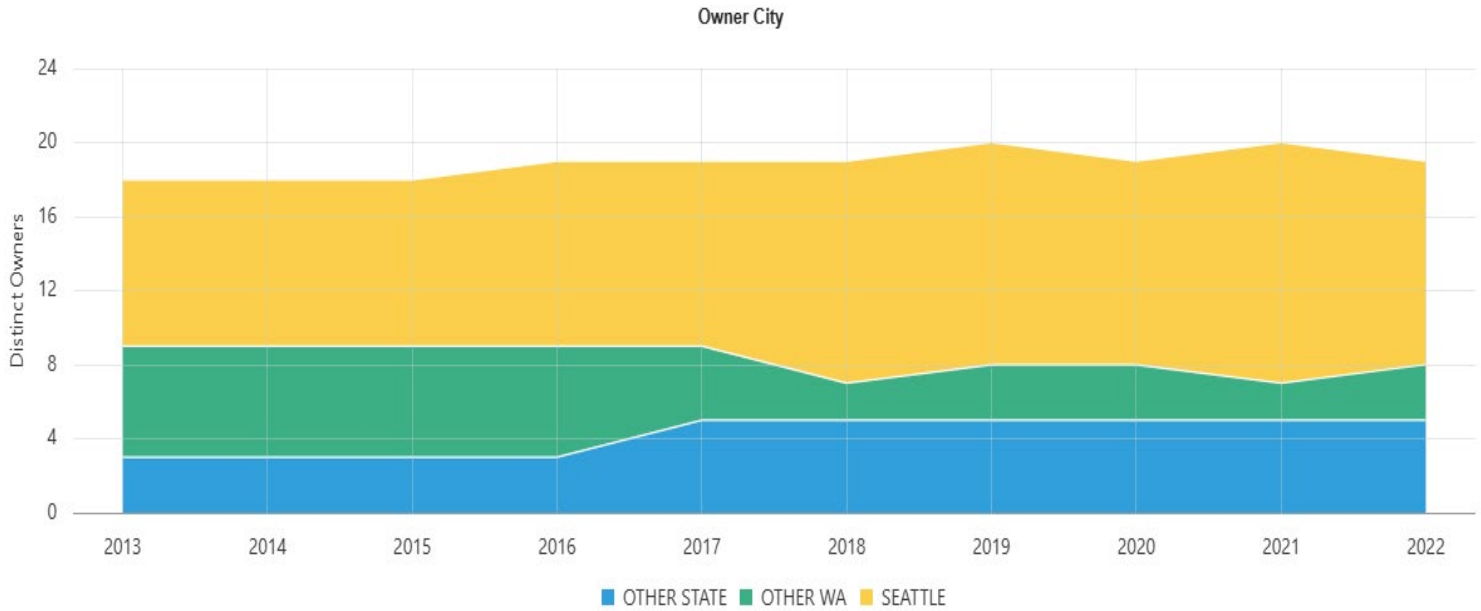


Allocation Participation

Community Impacts

Vessel ownership of vessels targeting yellowfin sole is represented historically in the below figures. Other states are considered to be states outside of Alaska, Oregon and Washington. The A80 sector shows mostly stable ownership in Washington.

Figure 5. Ownership Community of A80 Vessels' Targeting Yellowfin Sole, 2013-2022



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