



## C3 IFQ Sablefish Release Allowance Initial Review

February 2021 Council Meeting

### Action Memo

Council Staff: Jim Armstrong  
Other Presenters: Joseph Krieger, PhD (NMFS AKRO)  
Action Required: 1. Initial Draft EA/RIR – review  
2. Action as necessary

### BACKGROUND

The Council will review a draft analysis of impacts associated with removing prohibitions on releasing (discarding) sablefish that are caught by IFQ sablefish operations. Under the existing regulations, when sablefish are caught by an IFQ sablefish vessel and anyone onboard has pounds of sablefish in their IFQ account, all those sablefish must be retained. The action under consideration would affect specific regulations (50 CFR 679.7(d)(4)(ii) and 50 CFR 679.7(f)(11)) and Section 3.7.1.7 (General Provisions) in the BSAI and GOA Groundfish FMPs, thus requiring amendments to those FMPs.

The action under consideration was initiated by Council motion at their December 2019 meeting following a series of three discussion papers on the issue. Starting in April 2018, IFQ sablefish fishermen have provided testimony to the Council, that they were seeing a sudden influx very small and unmarketable sablefish showing up in their gear. These fish were becoming an economic burden to fishermen because regulations prevent them from being discarded, even though, according to testimony, these fish were mostly uninjured by the fishing gear and appeared very likely to survive if released. Fishery encounters with large numbers of small sablefish, each about 2-3 years old and 2-3 lbs whole weight, have become more frequent because recent year classes of sablefish are more abundant than any previously recorded.

Two alternatives were identified by the Council when consideration of this action was initiated: Alternative 1 (No Action) and Alternative 2 (Allow Voluntary Release of Sablefish in the IFQ Fishery). Specific sections of the attached analysis focus on the Elements and Options under Alternative 2, which are provided below along with the draft Purpose and Need for this action.

In comparison with mandatory discarding and a minimum size, the Council is currently considering voluntary discarding under Alternative 2, as a means to extend flexibility to fishing operations. In previous discussions, the Council noted differences in the size of sablefish caught between the different sablefish management areas off Alaska, and wanted to avoid an action that would force discarding on operations and areas for which smaller fish are a substantial portion of their catch. A range of outcomes associated with voluntary discarding and within an IFQ management structure is explored in the attached analysis, including impacts on sablefish ABC and the potential for discarding to expand to fish that are larger than those in the intended discard size range (less than 3 lbs).

Under the Alternative 2 Elements, a discard mortality rate would be applied to the overall quantity of sablefish estimated to have been released by the IFQ fishery and that mortality rate would have to reflect best scientific information available (Element 1). The allowance would necessitate accounting for IFQ discard mortalities which could be done either through data collection under the existing fishery monitoring program or through preseason estimates generated from analysis of fishery-independent longline survey catches (Element 2). An allowance for IFQ discarding would affect the harvest specification process as the sablefish stock assessment incorporates the estimated amount, size and age structure, and associated uncertainties into the calculation of ABC annually. Additionally, a deduction for IFQ discards would be applied to the overall IFQ TAC absent a separate discard account for each IFQ account (Element 3). Element 4 requests information on monitoring and enforcement that is provided in s

## **PURPOSE AND NEED**

Large year classes of sablefish result in significant catches of small sablefish in the IFQ fixed gear fisheries. Small sablefish have low commercial value and current regulations require IFQ holders to retain all sablefish. Available data suggest that survival rates for carefully released sablefish are high. operational flexibility to carefully release sablefish may increase the value of the commercial harvest and allow small fish to contribute to the overall biomass.

## **ALTERNATIVES**

### **Alternative 1, No Action**

Under the No Action alternative, all regulations and FMP language related to a prohibition on discarding sablefish would remain intact. Those regulations include 50 CFR 679.7(d)(4)(ii) and 50 CFR 679.7(f)(11). Additionally, discarding is prohibited in both the BSAI and GOA Groundfish FMPs in the fourth provision under General Provisions section 3.7.1.7, prohibiting discarding of sablefish.

### **Alternative 2, Allow Voluntary Release of Sablefish in the IFQ Fishery**

This alternative would eliminate the regulatory restrictions that prohibit release of sablefish caught by sablefish IFQ vessels as well as the FMP provision prohibiting discarding.

#### **Element 1: DMRs**

Apply a DMR to discarded sablefish of:

- a. 5%
- b. 12%
- c. 16%
- d. 20%

**Sub-option:** Select different DMRs for pot gear and hook and line gear

#### **Element 2: Catch Accounting**

**Option 1:** Sablefish discards will be estimated using observer and EM data with a DMR applied annually as part of the specifications process.

**Option 2:** Sablefish discards will be estimated pre-season based on AFSC longline survey encounter rates of sub-three pound sablefish with the DMR applied annually as part of the specifications process.

**Element 3: Discard Mortality Accounting**

Sablefish discard mortality associated with the IFQ fishery will be accounted for in the stock assessment. The analysis should describe the potential implications of voluntary discards on the sablefish stock assessment and specifications process.

**Element 4: Monitoring and Enforcement**

The analysis should describe potential monitoring and enforcement provisions that could improve estimates of voluntary and regulatory discards.