

# Draft SSC Report June 2018

## C4 Fixed Gear CV Rockfish Retention



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- The SSC commends the analysts for a very thorough exploration of the various costs and benefits of requiring the retention of rockfish caught with fixed gear, predominantly longline
- The exploration of home pack and donation practices for non-salable rockfish catch in rural communities provided useful new information
- The proposed modification of Maximum Retainable Amounts (MRAs) to Maximum Commerce Amounts (MCAs) is a reasonable way to manage the incentives to target rockfish species, while avoiding waste
- **The SSC finds the discussion paper provides a complete analysis and recommends release for public review**



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- The SSC notes three major categories of potential benefits
  1. Full retention would simplify currently complicated retention regulations (including combinations of MRAs and PSC)
  2. Utilization of rockfish is likely to increase – landing more fish provides opportunities sale, provide home packs for workers, or donate to food banks; even non-salable distribution can enhance local food security and nutrition

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3. Retained catch could be counted and studied, thereby reducing uncertainties in stock assessments. The SSC notes that reducing uncertainty per se is not a national standard, so for this to be considered a benefit, it is necessary that reduced uncertainty materially reduces the chance of overfishing, leads to better attaining optimum yield, or provides for sustained participation. Since the affected stocks are bycatch stocks assessed at Tier 5 (using point estimates of biomass and natural mortality), the SSC finds this reduction in uncertainty is unlikely to lead to changes in policies that lead to benefits.

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- The analysis considers a wide range of costs, including those associated with:
  - Target catch displaced by retained rockfish on trips with full holds
  - Loss of quality associated with delicate target fish rubbing against rockfish spines
- It would be helpful to clarify what is meant by “waste” of currently discarded rockfish. Mandating landings will result in losses on some fish, especially on longer trips more typical of the Western Gulf. The action could also lead to some discards by processors.
- The SSC recommends that the analysts include a representation of the 27% of fish that are currently being discarded, broken down by fishery, region and species, along with presumed reason for the discard. This will help clarify potential costs.

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- If differential distribution of beneficial and adverse impacts of the proposed amendment can be attributed to vessel characteristics (e.g., vessel length, hold capacity) or operational characteristics (e.g., area fished, average trip length), then an analysis of fleets and associated operational characteristics by community should be undertaken to determine the likely pattern of benefits and adverse impacts across communities
- Likewise, if general community or processor characteristics can be identified that would influence whether a community or set of communities would experience different types of impacts, this should be described in the document. Such characteristics may include community size, whether the community is on or off a road system, etc.

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- The SSC recommends reorganization of some sections of the report relative to categories of costs and benefits to more clearly describe the likely effects of requiring retention

