



IFQ Committee Report

May 26, 2022, Webconference

On May 26, 2022 the IFQ Committee held a meeting online via the Zoom platform. All meeting materials are available on the IFQ Committee eAgenda: <https://meetings.npfmc.org/Meeting/Details/2933>.

Members in attendance: Cora Campbell (Chair), Jeff Kauffman, Linda Kozak, Peggy Parker, Bob Linville, Erik Velsko, Buck Laukitis, Jeff Farvour, Dave Fraser

Members absent: Michael Offerman, Shawn McManus, Natasha Hayden, Craig Evens, Jeff Peterson

Staff: NPFMC: Sam Cunningham (coordinator), Sarah Marrinan, Sara Cleaver, Anna Henry, Sarah LaBelle

NMFS AKRO SF: Alicia M. Miller, Abby Jahn, Kurt Iverson, Mason Smith, Ph.D.

Others in Attendance:

Paul Clampitt	Merle Knapp	Jim Johnson	Megan O'Neil	John Moller
Bob Alverson	Heather McCarty	Mateo Paz-Soldan	Ian Knuckey	Lenny Herzog
Karen Severson	Landry Price	Karla Bush	Linda Behnken	Andrew Steinkruger
Marysia Szymkowiak	Angel Drobnica	Lauren Mitchell		

The Committee Chair, Cora Campbell, opened the meeting with introductions and an overview of the agenda. The meeting agenda can be found [here](#). Council and NMFS staff provided short presentations on six topics. One written comment regarding the release of small sablefish was submitted prior to the meeting (available on the eAgenda). Following staff presentations, seven individuals provided oral testimony to the Committee. Testimony was followed by a discussion among Committee members and the meeting was adjourned.

Staff Presentations

Update on Emergency Rule Requests

Alicia Miller (NMFS) provided a status report on the Council's 2022 emergency rule requests. The first was to allow temporary transfer of catcher vessel halibut and sablefish IFQ during the 2022 season, as had been approved for the 2020 and 2021 seasons. This request was denied as explained in a [NOAA letter](#) to the Council (March 30, 2022). The second request – to remove the vessel use cap for IFQ halibut harvested in IPHC Areas 4ABCD for the 2022 season – is pending but scheduled for Final Rule publication in early June. NMFS published a proposed rule on April 19, 2022 ([87 FR 23155](#)). The Committee was directed to a NMFS Alaska Region [webpage](#) where ongoing status updates are provided and frequently asked questions are answered.

Update on IFQ Omnibus Amendment Package

Abby Jahn (NMFS) provided an update on progress towards implementing the IFQ Omnibus amendment package. The Council took final action on this suite of IFQ amendments in April 2022. This action would revise pot gear configurations, gear marking requirements, gear retrieval and tending requirements, pot limits, and authorize jig gear for the harvest of sablefish. The action would revise the Adak Community Quota Entity (CQE) residency requirement for a period of five years. In addition, NMFS would clarify

Daily Fishing Logbook regulations for vessels less than 60' LOA that are deploying both hook-and-line and pot gear.

Staff informed the Committee that the tentative implementation schedule is a Proposed Rule in Fall 2022 with publication of the Final Rule and an effective date in Spring 2023. It is possible that the Final Rule will be effective prior to the 2023 IFQ season, but mid-season implementation might be more likely. NMFS will communicate with the fleet as progress continues. Staff were asked if the "30-day cooling-off period" could be waived to speed implementation. This is possible under the Administrative Procedures Act if certain criteria are met (e.g., relieves a restriction, has "good cause" under 5 USC 553(d)(3)). NMFS will solicit public comments on the proposed rule and would consider any comments on the timing of implementation in determining if waiving the cooling-off period is necessary.

Members of the Committee noted that waiving the cooling-off period and expediting implementation could be of special value if implementation is "on the cusp of the season start date". The Committee noted that having revised regulations in place at the start of the season would reduce confusion over operational elements like gear marking, gear tending, and gear retrieval, as well as allow vessel operators to gear up for the season appropriately in regard to pot gear configuration and pot limits.

Update on Revisions to Halibut Catch Sharing Plan and Recreational Quota Entity Funding Mechanism

Kurt Iverson (NMFS) provided an update on the halibut Catch Sharing Plan (CSP) and the Recreational Quota Entity (RQE). The Council reviewed a required halibut CSP Review in February 2022, which considered the halibut allocation split between the commercial and charter sectors in Areas 2C and 3A. The Council made a motion to potentially review and revise the allocation split established in the CSP. However, the Council made clear that its preferred method of dealing with allocative issues is through compensated reallocation, via the RQE.

In April 2022, the Council considered the RQE funding mechanism and identified its preferred mechanism as a Charter Halibut Stamp for charter anglers. Given the Council's motion, NMFS plans to develop corresponding regulations for Charter Halibut Stamps that would provide the RQE with funding. However, in order to move forward, U.S. Congress must pass legislation to provide NMFS with this authority. The U.S. House of Representatives recently passed the America COMPETES Act which would provide this authority, and the U.S. Senate passed a piece of legislation that included the same text. However, Conference Committees now need to convene to reconcile differences in other areas of the two bills. If the President signs legislation that grants the authority, the Council's motion stated that the Council intends to table or reconsider the path of reallocation through the CSP. This has yet to be scheduled and Council/NMFS staff have placed this issue on hold until more is known about whether the President will grant authority to implement Charter Halibut Stamp regulations.

This report was provided as an informational update. Committee members and the public were instructed that comments on inter-sector allocations are best-directed to the Council itself, while the IFQ Committee remains a body to inform the Council on the intricacies of IFQ fishing.

Medical Transfer Limitation (2020 through 2022)

Mason Smith, Ph.D. (NMFS) provided an overview of a possible regulatory amendment to waive medical transfers that were approved during the 2020-2022 IFQ fishing years. The number of medical transfers increased substantially during 2020 and 2021 during the height of the COVID-19 pandemic. Currently, those transfers count against the medical transfer limit (no more than three medical transfers in a seven-year period). At the same time, emergency rules liberalized temporary transfer restrictions during 2021 and 2021. The 3-in-7 medical transfer limit, itself, was implemented in 2020, which may have caused individuals some confusion as to whether to take a medical transfer or avail themselves of the temporary transfer emergency rule. NMFS staff clarified that any medical transfer that occurred prior to March 2020 does not count towards the 3-in-7 limit.

NMFS is conducting an analysis that considers the costs and benefits of waiving medical transfers during (options) 2020, 2021, and 2022 in regard to the 3-in-7 limit. NMFS is recommending that all three years of medical transfer history be waived. For example, the Final Rule would waive medical transfers for all three option years, and the 3-in-7 limit would “start clean” in 2023. If the Final Rule waives medical transfers for 2020 and 2021, medical transfers that occur in 2022 would accrue to the limit. The publication of a proposed rule does not require Council action, but Council input is welcomed. The Council may request to review a complete draft analysis or draft regulations. The Chair brought this issue to the Committee as an informational item.

NMFS indicated that a Final Rule publication is targeted for Spring 2023, prior to the IFQ season. Due to that timing, individuals might have to make decisions about whether to use a medical transfer in 2022 without knowing whether or not it will accrue to the 3-in-7 limit.

Area 4 Halibut Vessel Use Cap

Sam Cunningham (NPFMC) gave a recent history and overview of a proposal that came to the Council in April 2022 via written and oral testimony under Staff Tasking. At that time, the Council requested that the IFQ Committee consider the merits and priority of the issue. The issue and proposal were summarized for the Committee in a [memorandum](#) (May 4, 2022) posted to the meeting agenda.

Individuals and organizations petitioned the Council in April to consider a range of possible changes to the halibut vessel use caps for IPHC Area 4. The desired effect would be similar to the pending emergency rule request for 2022 but would be longer-lasting and not subject to annual review/approval under the emergency determination criteria. Any action would proceed through the regular Council/NMFS rulemaking process, and likely would not be implemented until several IFQ seasons from now. In short, the petitioners noted that a combination of the COVID years and the inherent logistics and economic landscape of Area 4 have led to a reduction in harvesting and processing capacity, and that vessel use caps may cause IFQ and CDQ halibut to go unharvested. Previous staff papers on the topic of vessel use caps had noted that the “coastwide” cap (0.5% of total Area 2C, 3AB, 4ABCD catch limit) can have area-specific effects if, for instance, an area’s catch limit increases while the coastwide limit decreases, or if harvesting/processing capacity in an area is uniquely constrained by external factors (e.g., low crab catch limits cause a Bering Sea processor to cease operations).

In April, the original petitioners proposed a vessel use cap that was specific to Areas 4C and 4D and based on a percentage of those catch limits, or a 4CD cap that was automatically higher than the coastwide-based cap (e.g., +50%). Other stakeholders expressed an interest in expanding the request to Areas 4ABCD, citing similar logistical issues, the necessity to make multiple-area trips, and a lack of available vessels with cap space to partner with CDQ groups. Stakeholders suggested that any action could be reviewed after several years to determine if the precipitating conditions continue to exist.¹ Other commenters noted that the CQE based in Area 4 has a specific vessel use cap (50,000 lbs.) that may warrant consideration.²

Staff highlighted that testifiers to the Council had not spoken to how NMFS could manage higher vessel use caps for platforms that fish in Area 4 *as well as* other areas that would presumably remain under the existing coastwide-based cap (Area 3) or the more-restrictive vessel use cap that applies in Area 2C.

The Committee was asked to make a recommendation to the Council on whether modification of the Area 4 halibut vessel use cap should be placed on the agenda and what its priority should be relative to other IFQ issues. It was noted that the Committee is not bound to consider only those proposals that were put forward at the April Council meeting.

¹ Staff clarified that the next IFQ Program Review is scheduled for 2023 and the following review would be in 2030.

² Note that the IFQ Omnibus package includes an option to relieve the Adak CQE from the residency requirement for a period of years, reflecting concerns about vessel/crew capacity in that area, not to mention the logistics of accessing onshore processing facilities.

The approaches to this issue that the Committee discussed are captured in the *Committee Discussion & Recommendations* section of this report (below). Staff notes that some Committee members linked the harvest capacity issue to a lack of time in the season to achieve greater harvest capacity and expressed an interest in future consideration of a year-round fishery for IFQ sablefish. That issue is distinct from halibut vessel use caps, but a discussion of constraints on IFQ seasons was accommodated (e.g., timelines for IPHC decision-making – January/February Annual Meeting – and NMFS rulemaking and subsequent issuance of IFQ).

IFQ Task List

Sam Cunningham (NPFMC) led the Committee through a review of the IFQ Task List, which is routinely posted to the Council’s eAgenda as part of “E – Staff Tasking”. The most recent IFQ Task List was updated in March 2022. That version will be reposted to the June 2022 Council agenda since there have been no Council-initiated changes to IFQ tasking and to show the Council what was before the IFQ Committee at this May meeting. The IFQ Task List has been substantially curtailed as a result of the IFQ Omnibus amendment package and an April 2021 Council [motion](#) that removed yet-to-be-scheduled items on “hired masters” and “mechanisms to promote voluntary quota share (QS) transfer”.

The March 2022 IFQ Task List includes two items that have reached Council final action (IFQ Omnibus and RQE Fee Collection) and are thus removed from the Task List. The Council has placed the Halibut CSP allocation action “on hold” until the status of RQE funding mechanisms is clarified through Congressional action or inaction. The Council heard interest from the IFQ Committee in March 2021 to place an initial review of small sablefish release on the agenda, with the acknowledgement that the action would take considerable Council, NMFS, and AFSC staff time. That issue has not yet been placed on the Council’s 3-Meeting Outlook.

Staff also highlighted several in-progress or upcoming products that do not need to be prioritized. As noted, the Program Review is scheduled for 2023 by rule. NMFS has already published a Regulatory Impact Review (RIR) on retroactive waivers for the IFQ medical transfer provision as it was applied from 2020 through 2022 ([posted to the IFQ Committee Agenda, May 2022](#)). NMFS is also working on a discussion paper that the Council requested ([Feb. 2022 motion](#)) to address regulatory consistency across IFQ and non-IFQ pot gear fisheries; this does not need to be prioritized by the Council, but input is welcomed.

Prior to Committee discussion, staff listed two candidates for additions to the Task List: Area 4 halibut vessel use caps, and authorization to onboard-process sablefish B and C shares. (Noting that small sablefish release is already on the Task List, but not scheduled.) The processing of sablefish B and C shares was proposed, discussed, and polled at the March 2021 IFQ Committee meeting. At that time, the Committee considered it an agreeable, worthwhile proposal but one that would benefit a small number of participants and thus not the highest priority.

At least one Committee member expressed an interest in reviving a previous Committee proposal that had not been swept into the IFQ Omnibus package or reviewed outside of a Committee meeting: making quota share blocks divisible. Blocks were created and the number of blocks that can be held were limited as tools to preserve fishery access, so that all available QS was not purchased by highest bidders. The rationale for this proposal is that QS was “blocked” for the purpose of keeping cheaper quota available based on abundance and quota market prices that are now outdated. In other words, blocks that were thought to be accessible and affordable have become less so, and willing sellers who subdivide their blocks would find interest from entry-level participants.

As noted previously, the IFQ Program is due for a Program Review in 2023. The next program review would be scheduled for 2030. Review of any aspect of the program in the interim is possible at the Council’s discretion, in consideration of the Council’s broader priorities for staff resources and agenda time. Committee members were prompted to think about items that the Council might want to accelerate

ahead of the 2023 Program Review so that any action coming out of that review might benefit from preliminary analysis in a discussion paper format.

Public Testimony

After staff presentations, the Committee received public comment from seven individuals. Affiliations are listed if they were noted by the commenters: Paul Clampitt (Sablefish and Halibut Pot Association), Bob Alverson (Fishing Vessel Owners Association), Heather McCarty (Central Bering Sea Fishermen’s Association), Lenny Herzog, Ian Knuckey (Deep Sea Fishermen’s Union), Linda Behnken (Alaska Longline Fishermen’s Association), John Moller (Adak Community Development Corporation). In general, public comment addressed two potential actions, of which the commenters were in favor: (1) moving small sablefish release to the list of Council action items and (2) analyzing less restrictive halibut vessel use caps in IPHC Area 4.

Small Sablefish Release: Commenters observed that the forced retention of sablefish below the size at which value per recruit is maximized results in poor economics. Commenters also noted that the transition to pot gear has changed size selectivity (smaller) and expected mortality (lower) of released fish. One commenter suggested that any future analysis should incorporate work done by Ian Knuckey, who submitted written materials to the Committee agenda prior to the meeting ([attached](#) as comment to IFQ Task List agenda item). It was clarified that purported “growth overfishing” is primarily an issue of economic return and incentive for participation, not stock sustainability. It was noted that sablefish growth rates seem to be slowing, and small fish might be part of the fishery for more years than once expected. Several commenters posed the question of whether this is related to high density of the sablefish biomass or ecosystem changes.

Area 4 Halibut Vessel Use Caps: Commenters noted the difficulty of harvesting Area 4 halibut IFQ under the existing vessel use caps, attributing the issue to processing capacity in remote areas, vessel availability, and the general economics of harvesting in a remote area. It was noted that tendering IFQ catch to hub-processing locations is not economical. There was general agreement among public commenters about including Areas 4A, B, C, and D in any potential action, and discussion on how an Area 4 cap could be crafted and how that cap would interact with the existing coastwide cap that applies to fishing in all Alaska areas other than Area 2C. It was noted that 4A could be a good area for new entrants to attain quota, but also that vessels fishing in 4D often fish 4A on the transit north. One commenter caveated support for this concept with the note that any changes to vessel use caps should be for a limited duration and options should not include a complete waiver of the vessel use cap. Others noted that a complete waiver would suit them, but they did not expect that option to be acceptable to all stakeholders. Concern for consolidation in the fishery was highlighted, noting that pre-scheduling a review after any rule implementation might push back against business plans that rely on and institutionalize consolidation. Another commenter expressed support for the concept of treating Area 4 CQE quota as similar to CDQ in that it would not count against the vessel use cap because it would increase interest in local CQE participation in the context of high operating costs. Commenters noted that managers of uncapped CDQ pounds still struggle to find vessels with cap space. Committee questions highlighted the fact that the “sequencing” of vessel’s annual fishing patterns is an important consideration – that any change to Area 4 caps relative to Area 3 should consider that some vessels fish Area 3 first for logistical reasons and because it is less safe to fish in the Bering Sea at the start of the IFQ season. In response to a Committee member’s question, one commenter suggested that vessel use caps could be expanded for sablefish as well as halibut.

Committee Discussion & Recommendations

Small Sablefish Release

The Committee recommends that the Council put the small sablefish release initial review on the agenda for action at a future meeting and noted that it is a priority for the Committee and the industry.

Committee members supported moving the review ahead with the rationale that released sablefish have low mortality and releasing small fish will maximize the value of the harvested resource. The Committee does not believe that a minimum size limit is appropriate or necessary. Several members stated that they would not support amendments to allow small sablefish release if a minimum size limit is included, citing impracticability and the risk of numerous unintentional enforcement violations.

As part of the small sablefish release discussion, some members wanted to tie in consideration of lengthening the sablefish season and/or decoupling it from the halibut season. Including season date changes in a small sablefish analysis was not unanimously supported and, thus, is not part of the Committee's recommendation.

Area 4 Halibut Vessel Use Caps

The Committee recommends that the Council initiate an analysis of modified vessel use caps for Area 4 halibut IFQ, with several options suggested.

Most Committee members supported an analysis that would affect vessel use caps in all the Area 4 IFQ areas (4ABCD). However, some supported a slower approach that focuses on 4CD, noting that increased vessel caps can lead to entrenched fleet consolidation and asking whether the rationale for higher caps in 4AB is based on permanent factors or a reaction to several anomalous years shaped by COVID-19.

The Committee discussed three options for Area 4 vessel use caps: (1) Area 4 cap based on 4% to 6% of 4ABCD IFQ catch limit; (2) Area 4 cap that is 50% greater than the "coastwide cap" (0.5% of 2C+3AB+4ABCD IFQ catch limits); (3) Separate vessel use cap for fishing in Area 4. Members generally agreed that a complete waiver of vessel use caps in Area 4 should not be analyzed.

The Committee acknowledged that the details of how different vessel use caps in different areas need to be worked out, and that the greatest management challenge applies to the platforms that are fishing a full vessel cap – the number which may be increasing under existing circumstances. Vessels that fish both inside and outside of Area 4 might need to have "sub-caps" that apply to their fishing in Area 2C (already in existence) and fishing in Areas 3A and 3B (would remain based on the coastwide catch limit).

The Committee stated that any new vessel use cap should be designed so that the cap does not affect the sequencing of the areas that an IFQ vessel might fish during a given year. In other words, if a higher vessel use cap exists for fishing in Area 4, vessels that also fish in 2C and 3AB should not be required to complete their fishing in the Gulf of Alaska before entering Area 4, nor should they be required to fish Area 4 first. Several members noted that safe and effective fishing in Area 4 often begins later in the year. Some members expressed that if regulations required Gulf of Alaska fishing to be completed first then there would be an oversupply of vessels in Area 4 congregating at the same point in the season. The fleet contains a mix of vessels that are based in western Alaska and vessels that fish areas east-to-west, and the Committee wants any action to promote flexibility and avoid the unintended consequences associated with prescribing the time/area of fishing.

The Committee supported a review of any new measure within three to five years of implementation. The purpose of review would be to determine whether the challenges supporting the rationale for less restrictive vessel use caps still exist. Staff informed the Committee that the next IFQ Program Review is scheduled for 2023 and the following review would occur in 2030, which may or may not coincide with the desired timing of review. Future Committees or Councils would need to determine the need for, and priority of, off-schedule review.

No members were opposed to the idea of treating Area 4B halibut CQE like Area 4 halibut CDQ (catch does not accrue to vessel use caps), but some members felt that this should be analyzed separately from any vessel use cap measures.

Rationale for the recommendation included the decline in Area 4 vessel participation, closure of processing plants that allow small vessels to deliver locally to remote parts of Area 4, whale depredation driving the fishery farther from small boat communities (e.g., St. Paul Island), and the combined effect of

high costs (fuel/bait/services) and lower ex-vessel prices in Area 4 relative to other areas. Together, these challenges require larger boats that can fish more quota. It was noted that lower coastwide halibut abundance has driven the vessel use cap to one-half or less of the caps that existed earlier in the IFQ Program's history. It was also noted that the logistical effects of COVID-19 have been even greater in Area 4 where medical infrastructure is less accessible. It was noted that if the smaller number of available, crewed vessels had higher caps then there would be more opportunities for entry-level QS holders to find a platform on which to harvest their quota and build investment in the fishery.

Members did not want to complicate the issue by creating any distinction between parts of Area 4A that are north/south of the Aleutian Islands chain. One member noted that smaller boats have accessed the Gulf-side of Area 4A to build capital and invest in QS that can be fished and delivered to small processors throughout the Gulf of Alaska.

The Committee recommended moving directly to initial review in hopes of having a permanent rule in place by 2024.

Medical Transfer Limitation

The Committee recommends that NMFS proceed with the regulatory package, as proposed, to specify that medical transfers in 2020 and 2021 do not count against IFQ Program limit on the use of medical transfers. The Committee was unanimous in recommending that NMFS proceed with action. Some viewpoints differed on which years should be included (2020, 2021, 2022). The recommendation reflects that all members supported including 2020 and 2021. No members strongly opposed including 2022, but the discussion was such that including it did not meet the high bar of unanimous recommendation that the IFQ Committee typically follows.

The Committee's rationale for supporting the Agency's action was based on the fact that the COVID years were unprecedented and there should be no penalty for prioritizing safety. Some members felt that there was confusion among IFQ participants as to whether they should have been using medical transfers during that time or waiting to avail themselves of the emergency rules that were implemented mid-year in 2020 and 2021 to allow unrestricted IFQ transfers. Some individuals may have used a medical waiver thinking that it was the same as the temporary emergency transfer rule. Some members felt that wiping clean the slate of medical transfers – which itself was set to a new standard of 3-years-in-7 beginning in March 2020 – is the most equitable and fair approach.

Opinions about the inclusion of 2022 were divided between those noting that many operations are returning to pre-2020 status (example given: cruise ships docking in Southeast Alaska) and those noting that health concerns still exist for many individuals and that businesses like shore-based fish processors are still operating with health restrictions (e.g., limited access for vessel operators to enter plants and observe offloads).

Other Business Considered

Allow processing sablefish B & C shares onboard catcher vessels

A proposal of this nature came up at the March 2021 IFQ Committee meeting but was not prioritized or placed on the Council's to-do list since that time. There is general Committee interest in this idea but it continues to be considered a lower priority than the items recommended above. Some members gave it a lower priority because it is likely to benefit a small number of vessels, and the appeal may differ based on areas where there is greater/lesser availability of shoreside processors who will buy sablefish. Those in favor of the idea stated that it would give self-selecting operators the ability to spend more time on larger fish and market them directly, which can be critical when shoreside processors are not buying sablefish either because of their own downstream markets or because they are full with trawl groundfish or salmon deliveries. Access to shoreside processing capacity has become a challenge with higher sablefish catch limits. It was noted that many catcher vessels already head and gut sablefish, so a platform might only need to add freezing and packaging capabilities. Members who are familiar with direct salmon marketing

said that it has benefitted the overall brand of Alaska seafood and increases the market for all harvest stakeholders. One member noted that this option could be of particular value in far-west areas (e.g., WGOA, BS, AI) where there are fewer shoreside processors taking sablefish. One member expressed the reservation that bringing fish to shore was a core tenet of the IFQ Program, but also stated their experience with Gulf of Alaska processors that are sometimes declining mixed sablefish/halibut deliveries.

Entry-level access: breaking up QS blocks

The Committee observed that small blocks of QS are difficult to find on the market, and that the ability for a seller to divide a block could facilitate entry-level participation and voluntary inter-generational quota transfer. A member noted that small blocks can be swept up but not divided. Others noted that the regulations defining QS blocks are based on QS/IFQ ratios dating to the 1990s, which might not adequately reflect the currently affordable price for a fishable amount of IFQ. In general, members felt that the purpose of the block mechanism was to keep quota accessible and if that objective is not being achieved then it could be revisited. Some members suggested that this and other entry-level considerations could be incorporated into the upcoming Program Review (2023).

Extended or year-round sablefish season

The Committee discussed the possibility of an extended or year-round sablefish season, citing the challenge of harvesting larger catch limits given natural constraints in the fishery or balancing the multi-fishery portfolios that many IFQ participants prosecute. A longer season could also increase opportunities to market fresh product and allow vessels that typically start crabbing in October/November to push later due to the low state of crab catch limits. Members recognized that changing the season could create logistical challenges for the NMFS Restricted Access Management (RAM) division that issues annual IFQ, and could also contribute to cost recovery fees. The availability of shoreside processing markets may continue to act as a practical constraint on the length of the season. It was noted that some processors do not buy fish after Thanksgiving; also that sablefish, alone, would likely not be sufficient volume to keep some plants open late into the fall/winter. Some in favor thought that lengthening the season could reduce crowding on the fishing grounds. Some neutral or opposed noted that a winter fishery could be more advantageous to larger vessels but acknowledged that this would not directly disadvantage smaller vessels since quotas are allocated and classified by vessel size.

Members recognized that any halibut caught outside of the IPHC season would result in regulatory discards. The Committee was unsure whether extending the season might create biological concerns (e.g., fishing on spawners) and noted that as a topic for analysis. A question was posed about whether fish quality would be different in the months that are currently out of season.

Medical transfers for QS holders who can use “hired master”

One member highlighted a circumstance where an initial QS issuee is practically unable to hire a vessel master, is ill, but is ineligible for a medical transfer because they own more than 20% of a (26 foot) vessel. Regulations would result in this person’s IFQ being stranded. The Committee was interested in information from NMFS on why a person who owns a vessel is precluded from using the medical transfer provision.

Fishermen access to plant offloads

One member stated that some fishermen are not able to observe weighing and grading a shore-based processing plants where campuses remained closed under COVID-19 protocols. The member noted that processors put workers on the vessel to offload but skippers or vessel crew cannot enter parts of the plant facility. There was interest in information from NMFS on scale and weighing requirements that are spelled out in regulation, and whether fishermen could be guaranteed access to “hanging weights” off the boat or be given round weights by the processor. NMFS intends to follow up with Committee members prior to the June Council meeting.

Full retention of sablefish in pot gear

One member expressed interest in the ability to retain sablefish that are caught in Pacific cod pots as IFQ sablefish, so long as the operator holds sufficient IFQ. The member observed that sablefish have been seen in Pacific cod pots more than in the past, ostensibly due to the large biomass (citing examples from January and September fishing). Other examples where sablefish cannot be retained as IFQ are when fish are delivered to a tender vessel, and when delivering to a shore-based processor at night. The Committee member is interested in any revisitation of regulations that prevent full retention of sablefish. Staff noted that the pots used to fish for Pacific cod are legal gear for sablefish IFQ.