

C3 REMOVING PROCESSING RESTRICTIONS ON SQUIDS AND SCULPINS IN THE BSAI AND GOA

STEVE MACLEAN, OCTOBER 2020



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INTRODUCTION AND BACKGROUND

- This Regulatory Impact Review examines the benefits and costs of proposed alternatives regarding processing a sale of squids and sculpins as part of the Ecosystem Component category in the FMPs for the BSAI and GOA.
- Initiated in October 2019
- Purpose and Need adopted in February 2020 (§1.1 Page 10)
 - Squid and sculpin are ecosystem component (EC) species
 - Final rule to move squid to EC prohibited processing and sale other than fishmeal contrary to Council's stated intention.
 - Purpose of the action is to align regulations with long-standing use of squid
 - Disposition of sculpins consistent with squids
- Initial Review completed in February 2020
- Final Review responds to SSC, AP, and Council comments and adds 2019 data



DIFFERENCES FROM INITIAL REVIEW

ES P9

- Confirmed Tables 3-2 and 3-3 are most up to date information on abundance
- Table 4-1 shows increase in incidental catch of squid in 2019
- Tables 3-4, 3-5, 4-2 and 4-3 updated to include 2019 squid catch data
- Section 4-6 updated to identify “other” squid processing communities of Akutan, King Cove, Sand Point, and Seward
- Section 4.5.1.4 updated to indicate fixed-gear vessels are primary consumers of squid bait
- Sections 4.6.1 and 4.6.2 updated to reflect use of bait by fixed-gear vessels and increased cost associated with imported bait
- Section 4.5.1.2 updated to include information about EFP 2019-03



CONCLUSIONS

- Anomalously high squid catch in 2019 was likely affected by factors other than inclusion in EC
 - Overall abundance of squid
 - Avoidance of Chinook salmon and sablefish
- Potential impacts of removing processing restrictions are economic
 - Additional revenue from squid as bait
 - Reduced costs to fixed-gear fleet by using squid as bait
 - Reduced regulatory discards



DESCRIPTION OF ALTERNATIVES

CH 2, P 15

- 2.1 Alternative 1: Status quo. Squids and sculpins in both the BSAI and GOA FMPs are designated as non-target ecosystem component species with prohibition on the use of squids and sculpins other than as fishmeal.**
- 2.2 Alternative 2: Squids and sculpins in both the BSAI and GOA FMPs are designated as non-target “ecosystem component species”.
Preliminary Preferred Alternative.**



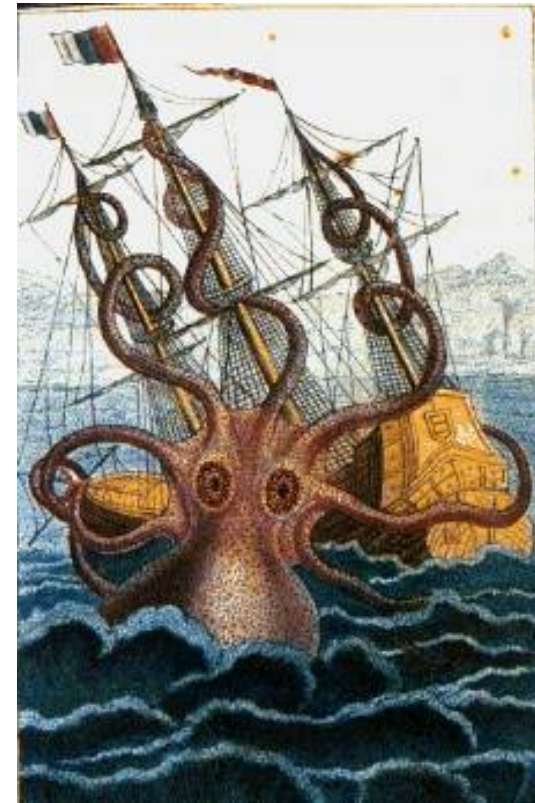
COMPARISON OF ALTERNATIVES – TABLE 2-3, P 18

Management Measure	Alt 1- No Action	Alt 2 – No Processing Restrictions
Prohibit Directed Fishing	Yes Prohibit directed fishing in regulations at 679.20(i)	Yes Prohibit directed fishing in regulations at 679.20(i)
Retention and Sale	Yes Retention and sale allowed as fishmeal only, subject to MRA limits.	Yes Retention and sale as any product form allowed, subject to MRA limits.
Annual Harvest Specifications	No - Periodic reports on biomass information from current surveys will be included in the SAFE - Catch does not accrue to optimum yield cap	No - Periodic reports on biomass information from current surveys will be included in the SAFE - Catch does not accrue to optimum yield cap
Incidental Catch Management	Yes MRA = 20% for all basis species	Yes MRA = 20% for all basis species
Recordkeeping and Reporting	Yes Require catch reporting	Yes Require catch reporting



BIOLOGICAL AND FISHERY INFORMATION CH3 P19

- 15 species of squids in BSAI and GOA
- *Berryteuthis magister* is most abundant
- No commercial fishery for squid in BSAI or GOA
- AFSC bottom trawl surveys do not sample squid reliably.
- Biomass estimates fluctuate annually and are likely underestimates.
- Squids are caught incidentally to directed groundfish fishery – primarily pollock (Table 3-4 and 3-5)



REGULATORY IMPACT REVIEW

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Table 4-1. Catch (mt) and retention (mt) of squid by all groundfish fisheries by FMP area 2009-2020

Year	BSAI			GOA		
	Catch	Retained	% Retained	Catch	Retained	% Retained
2009	360	181	50.4	337	293	86.7
2010	410	270	65.8	131	120	91.6
2011	336	149	44.2	233	188	80.9
2012	688	471	68.5	18	3	13.7
2013	299	112	37.4	322	304	94.6
2014	1,678	993	59.2	94	63	66.6
2015	2,364	1,951	82.6	411	329	80.1
2016	1,286	526	40.9	240	139	57.8
2017	1,996	1,019	51.0	39	12	30.1
2018	1,736	1,299	74.8	43	9	20.3
2019 ¹	5,928	2,742	46.2	63	48	76.1
2020 ²	260			101		

¹Squid managed in EC category. AKFISH_REPORT_V_CAS_NONTARGET_ESTIMATE accessed January 15, 2020. AKFIN accessed December 18, 2019

²Squid catch through July 7, 2020 (NMFS, Pers. Comm.). Amount retained in 2020 is not available.



REGULATORY IMPACT REVIEW

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Table 4-4. Annual production (in pounds) of squid to fish meal, whole bait, and whole fish/food fish in the BSAI and GOA, combined from 2009 – 2018.

	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Fish Meal								*	*	*
Whole Bait	86,743	389,226	262,897	299,184	277,434	798,976	856,860	*	*	832,476
Whole Fish	313,711	*	*	2,690	24,740	*	*	*	*	*
Processors	7	6	8	10	10	4	4	5	3	7

* Data are confidential

Source: AKFIN accessed December 23, 2019

Table 4-5. Total production (in pounds) of squid to fish meal, whole bait, whole fish/food fish, and gross first wholesale value in the BSAI and GOA, combined, from 2009 – 2018.

Product Type	Total Production weight (pounds)	Gross first wholesale value (\$)
Fish Meal	9,209	7,115
Whole Bait	3,804,682	2,347,114
Whole Fish	836,147	374,835

Source: AKFIN accessed December 23, 2019



REGULATORY IMPACT REVIEW

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Table 4-6. Total squid production (mt) by community in the BSAI and GOA, 2009 – 2019.

	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Dutch/Unalaska	*	71	42	73	8	592	655	82	320	662	1,271
Kodiak	296	125	184	2	276	60	318	127	6	4	8
Other	126	179	80	379	108	324	1,202	226	270	383	1,350

*Data are confidential

Source: AKFIN accessed August 7, 2020

Other Communities includes Akutan, King Cove, Sand Point, and Seward



ANALYSIS OF IMPACTS

CH 4.6

- Lack of data and predicting individual actions make analysis of impacts difficult
- Before 2019 squid could be processed and sold, prohibited starting in 2019
- HOWEVER, some processors did sell squid as bait in early 2019 until told of the restriction at the end of July 2019
- This provides some information about whether sale of squids as bait affected the level of squid catch



ANALYSIS OF IMPACTS

CH 4 P41

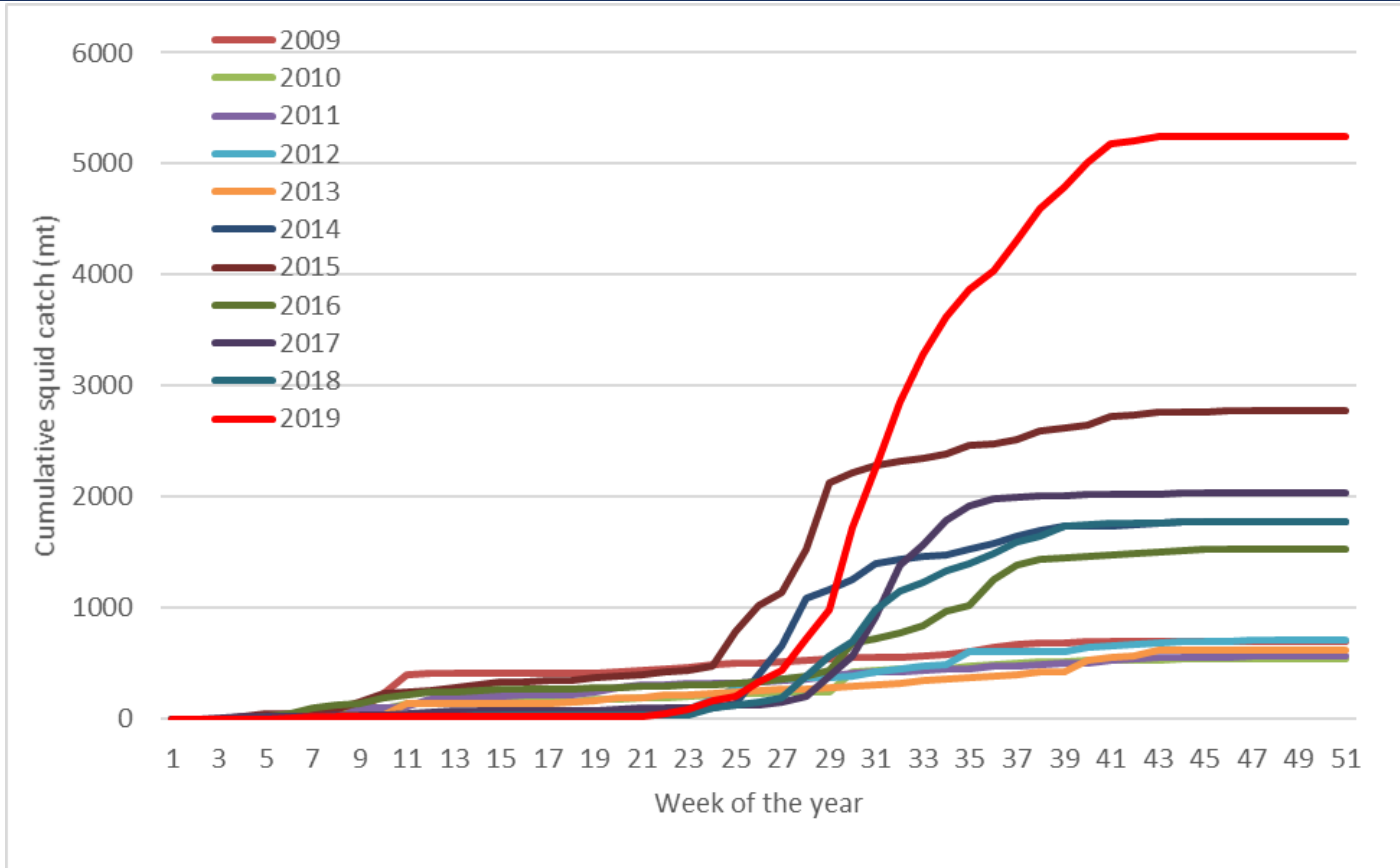


Figure 4-4. Cumulative squid landings (mt) by week in the BSAI and GOA 2009 - 2019. AKFIN 12.23.2019.



ANALYSIS OF IMPACTS

CH 4.6.1 P42

- Alternative 1 – status quo
 - Squids and sculpins remain as Ecosystem Component Species with all requirements and processing restrictions
 - Difficult to predict levels of incidental squid catch because of data limitations
 - If high levels of incidental catch persist, processors may experience higher costs
 - Processors may forgo revenue from squid processed as bait
 - Local fixed-gear vessels may have to import bait at higher cost



ANALYSIS OF IMPACTS

CH 4.6.2 P43

- Alternative 2 – Action Alternative – Preliminary Preferred Alternative
 - Squids and sculpins remain as Ecosystem Component Species with all requirements, but no processing restrictions
 - Difficult to predict levels of incidental squid catch because of data limitations
 - If high levels of incidental catch persist, processors may be able to generate additional revenue from bait or whole fish/food fish
 - Reduce regulatory discards
 - Local fixed-gear vessels may have lower costs for bait



ANALYSIS OF IMPACTS –COMMUNITY AND SOCIAL

- Potential community and social impacts are economic
- Processing squid to bait provides some revenue to processors and may reduce costs to local fleets.
- No other impacts that would create adverse economic impacts on any fishing community or cause other adverse social impacts



ANALYSIS OF IMPACTS

- Both alternatives require monitoring of 20% MRA
- Alternative 1 requires monitoring of product forms to ensure squid and sculpins are not processed into product forms other than fish meal
- No immediate implications for State fishery management
- Marginal impact on Net Benefits to the Nation
- Consistent with MSA National Standards
- Consistent with Council's Ecosystem Vision Statement



THANK YOU

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