


MEMORANDUM

TO: Council, AP, and SSC Members

FROM: Clarence G. Pautzke 
Executive Director

DATE: April 7, 1989

SUBJECT: Problems and Concerns With the Fisheries

ACTION REQUIRED

- A. Finalize a comprehensive set of current management problems which the management alternatives will be designed to correct.
- B. Finalize a list of concerns against which each of the management alternatives can be compared and evaluated.

BACKGROUND

A. Problems to Correct

The effectiveness of any fishery management system can be assessed by its ability to solve current fishery management problems while at the same time not creating new sets of insolvable or intractable problems. Any rational examination of alternative management systems must therefore begin with a statement of the problems to be solved.

Four lists of management problems have been developed over the last two years. The first was provided by the FOG Committee in 1988 and applied to all Council-managed fisheries:

- 1. Biological conservation
- 2. Declining data on which to base Council decisions
- 3. Excess capacity in the harvesting sector
- 4. Increased allocation conflicts
- 5. Bycatch waste

The second set of identified problems was provided in the DRAFT EA/RIR/IRFA for Sablefish Longline Amendment Package:

- 1. Gear conflicts
- 2. Deadloss
- 3. Discards
- 4. Economic inefficiency
- 5. Product quality
- 6. Safety
- 7. Catch limit management

The third list of problems was developed during the technical workgroup meeting held in Seattle on March 1, 1989, following the Council's public scoping meeting. Points germane to the group's consensus were:

- Conservation of stocks is not a problem with current management *per se* but rather a fundamental requirement of any management system. Therefore, the group assumes that any system adopted must satisfy the conservation criterion. If a change in management system improves or degrades management's ability to conserve stocks it should be part of the analysis.
- Likewise, the collection of fisheries performance data is an absolute necessity and is assumed to be a requirement of any adopted management system. Again, whether adoption of a particular management regime will positively or negatively affect the collection of fisheries performance data should be discussed in the analysis.
- Several items on the lists from FOG and the sablefish EA/RIR are identical or are the same problem stated from two different perspectives. For example, economic inefficiency and excess harvesting capacity (overcapitalization) are the same problem.

The group therefore suggested that any proposed change in management be judged by its ability to solve:

1. Allocation conflicts
 - a. Management or preseason allocation
 - b. Gear conflict, both intra and inter-gear
2. Excessive non-catch fishing mortality
 - a. Deadloss - ghost fishing and lost gear
 - b. Bycatch loss - species whose PSC apportionment or TAC has been reached
 - c. Discard mortality - species not landed for economic reasons
3. Economic inefficiency - Excess capacity
4. Poor product quality
5. Decreased safety

The group also agreed that economic inefficiency/excess capacity was a fundamental problem that any management system must address and that the other problems on the list, specifically, poor product quality and decreased safety, were not problems but rather symptoms of an overcapacity problem.

The fourth list of problems was drafted by the Fishery Planning Committee during their March 28, 1989 meeting. The Committee reviewed the three sets of problems listed above, written public comments, and testimony from the public scoping meetings. Six problems were identified [item C-5(b)(1)] including the five problems listed by the technical workgroup with the addition of:

6. Opportunity for new entrants into the industry and increased economic development

The Committee views the areas of biological conservation and data collection as endemic problems but it was agreed that they would be evaluated by being placed on the list of concerns. Allocation conflicts and non-catch fishing mortality are problems the Council already deals with in most if not all of its fisheries. Excess harvesting capacity was the problem identified by the Council in its original call to form FOG and in all subsequent discussion. Opportunity for new entry and economic development was an item raised in the public scoping meetings and felt to be of sufficient importance facing any management system to list as a problem. Product

quality and safety were areas in which some quantitative analysis may be of help to the Council and the Committee directed staff to prepare what documentation is available.

B. Concerns to Evaluate

The Committee reviewed the list of sablefish concerns which the Council agreed to at its January meeting and modified it to include twenty-one concerns applicable to all of the fisheries (item C-5(b)(2)). Several of the sablefish concerns were dropped since they are currently being addressed (pipeline, cut-off date, gear group allocations) and philosophical concerns were not included. Nine new concerns were added to the list including FOG's concern of world competitiveness (13), several concerns raised during public scoping meetings (14, 15, 19, 20 and 21), and endemic concerns (16, 17 and 18). The Committee feels that this list is a fair measure of the concerns expressed by the public and Council. After Council adoption these concerns will be given special attention in the analyses of alternative management systems.

Problems Facing the Fisheries

The problems listed below are those the Fishery Planning Committee believes are facing the groundfish and crab fisheries. It is these problems that the management alternatives will be designed to correct.

1. Allocation conflicts
 - a. Management or preseason allocations (examples include sablefish gear in the Gulf; shorebased vs at-sea processing)
 - b. Gear conflict, both intra and inter-gear (examples include excessive amounts of longlines on the grounds causing tangles, grounds conflicts between trawlers and longliners during halibut season)
2. Excessive non-catch fishing mortality
 - a. Deadloss - ghost fishing and lost gear
 - b. Bycatch loss - species whose PSC apportionment or TAC has been reached
 - c. Discard mortality - species not landed for economic reasons
3. ~~Economic inefficiency~~ - excess harvesting capacity
4. Poor product quality
5. Decreased safety
6. Opportunity for new entrants into the industry and increased economic development
Short Seasons

Areas of Concern

Listed concerns will be used to evaluate each of the management system alternatives. For example, assuming each alternative adequately addresses the management problems, how each alternative accommodates the listed concerns will undoubtedly help the Council and Secretary determine the preferred alternative.

The Fisheries Management Committee recommends the use of the following list of concerns as expressed through past committees, Council discussion, public comment, and scoping sessions:

1. Concentration of fishing privileges
2. Disruption of the traditional relationship between vessel owners, crewmen, and processors.
3. The fear of increases in governmental controls, regulations, intrusion, and costs.
4. Locking out proximate local communities from future participation.
5. Highgrading.
6. Extremely high "buy in" costs for new entrants and an associated decrease in the ability of new entrants to make it on their own.
7. Limited access is forever and, even if not working, will not go away.
8. Fishers will begin to work for a wage rather than shares and their income will decrease.
9. Processing will move almost entirely offshore.
10. Development of a blackmarket with illegally caught fish.
11. Keep any participation rights in the hands of those otherwise involved in the industry.
12. The management system allows for the full harvest of total allowable catch.
13. Provide a framework for the U.S. industry to be competitive in the world groundfish and crab markets within the principles of sound biological management.
14. Allow for technological innovation.
15. Unequal economic advantage will be given to those possessing fishing privileges.
16. Biological conservation must be maintained.
17. Data collection must be sufficient to allow for sound biological management.
18. Enforcement costs may be excessive.
19. Changes will occur for fishermen, their families, and communities.
20. Flexibility to stay competitive by changing between gears and species.
21. Consumers receive a high quality product at a reasonable price.