

## **True Accountability Proposal**

### **Introduction**

Separate Accountability as described by ALFA, proposes to account for Charter Guideline Harvest Level overages in the Removals portion of the IPHC halibut catch calculations, while not including those overages in the projections for anticipated recreational removals for the following year. One result of this suggested accounting change would be to lessen the “ding” of a charter overage on the following year’s commercial allocation. Another effect would be treatment of the GHM as an allocation, something it was never intended to be.

If the charter sector had a firm allocation and if management tools were in place to effectively manage the charter harvest within its allocation, what ALFA proposes would be the result. At present, neither of these prerequisites exist. Furthermore there are other elements to the accountability equation that have not been addressed, namely wastage, bycatch and the loophole created by splitting charter operations from the rest of the recreational fishery.

### **Wastage**

Wastage is defined as halibut mortality from commercial halibut fishing. The IPHC says that wastage “primarily refers to the mortality of sublegal halibut that are returned to sea or legal sized halibut that are caught by lost or abandoned commercial fishing gear and it is divided into legal sized and sub-legal sized fish.” (Note that IPHC fails to account for wastage from both high-grading and so-called “economic discards”.) In 2004, wastage for areas 3A and 2C amounted to 1.04 million pounds, 91,000 pounds in the legal-sized category and 949,000 pounds in the sublegal-sized category. Legal sized wastage is accounted for in the removals boxes after the total CEY is calculated, while sub-legal wastage is accounted for in the harvest rate box, above the CEY calculation. Under the ALFA proposal, the charter sector would still be penalized by commercial wastage, assuming the charter allocation was a percentage of the Combined Fishery Catch Limit.

### **Bycatch**

Bycatch refers to any non-targeted species that are captured while fishing. Regulations require that halibut bycatch be returned to sea. Bycatch mortality depends on the fishery, but ranges between 25 and 75%. In 2004, there were 3.958 million pounds of trawl bycatch in areas 3A and 2C. Under the ALFA proposal, both the charter and commercial sectors will continue to be penalized by bycatch from the trawl sector.

### **Recreational Loopholes**

Currently, non-charter recreational fishermen are not included in any halibut management plans other than a 2 fish per day limit. Under the ALFA proposal, projected non-charter recreational catch would continue to be deducted from the Total CEY, now affecting the

both charter and commercial allocations in an open ended manner. Should charter operations be restricted, it is safe to say that we will see an increase in private fishing trips, bare boat rentals and “self-guided” operations, all clearly not charter operations.

### **True Accountability Proposal:**

The definition of True Accountability is simple: *Each sector is 100% accountable for both staying within its allocation and minimizing its wastage or bycatch.*

Necessary Prerequisites:

1. Separate allocations for recreational, longline and trawl bycatch sectors.
2. Management tools in place to keep all sectors harvest within or very close to allocation.
3. Reliable estimates of trawl bycatch, longline wastage, including high-grading and economic discards, as well as recreational wastage.

Accounting Changes:

1. All projected wastage (both legal and sub-legal sized) is deducted directly from the allocation of the sector that causes it.
2. Previous year overages are deducted from that sector’s allocation.

Resulting in the following:

1. Each sector is 100% accountable for all of its removals, wastage and overages.
2. Other sector’s allocations do not suffer from another sector’s overages, wastage or bycatch.
3. Each sector now has direct financial incentives to minimize overages, bycatch and wastage, since all now directly affect only that sector’s catch limit.

Note: There is contention concerning the treatment of all recreational fishermen as a single sector vs treating the charter element differently from the non-guided element. TA would work in either scenario, with the caveat that in the second scenario, the so-called recreational loopholes would still exist, and private recreational removals would be taken off the top as they are now.

