## Appendix C

## Norton Sound Red King Crab Summer Commercial Fishery Discard Estimation

Formal methodologies for estimating discards in the Norton Sound red king crab summer commercial fishery from observer data have not been established. Here, I describe a few methods and discuss pros and cons of each method.

Norton Sound Summer Commercial fishery observer coverage started in 2009 as a feasibility project, but formal data collection started in 2012 and terminated in 2019. The main objective of the observer coverage was to gain information about the size composition of discarded crab, NOT to estimate total discards. Because of this, carrying fishery observers was optional/voluntary and participation was limited to vessels that are large enough to carry a fishery observer (a portion of the fleet are of a vessel length too small for an additional person). Thus, participating fishermen/vessels are NOT representative of the entire fleet. The fishery observer worked as a crew member, but also recorded biological data including sex, carapace size, shell condition, etc. for all red king crab in selected pots. Fisherman sorted out discards and noted those individuals, and as such, observed discarded crab are deemed accurate. Because of the observer coverage is biased towards larger vessels, it is uncertain whether fishing behaviors of observed vessels are representative of unobserved vessels. Possible concerns include:

1. The participating fishermen have larger boats and are experienced. They may select better fishing grounds (e.g., higher number and proportions of legal-size crab relative to sub-legal size crabs). This leads to higher CPUE and lower discards.
2. The participating fisherman may allow observers when they expect higher discards. Additional free labor deckhand (i.e., observer) is always helpful. This leads to higher discards.
3. The participating fisherman may keep more (with catcher-seller permits) legal crab that are not accepted by NSEDC.
4. Unobserved small boat fisherman may keep more legal crab that are not accepted by NSEDC . (catcher-seller permits, personal-subsistence use).

## Estimation Methods

Every discard estimation method is based on the following data (Table 1)

| Observer survey data | Fish Ticket data |
| :--- | :--- |
| Sublegal crab discards $\left(n_{\text {sub }}\right)$ and <br> weight $\left(w_{\text {sub }}\right)$ | NA |
| Legal crab discards $\left(n_{l d}\right)$ and weight <br> $\left(w_{l d}\right)$ | NA |
| Legal crab retained $\left(n_{r}\right)$ and weight <br> $\left(w_{r}\right)$ | Total Legal crab retained $\left(N_{R}\right)$ and <br> weight $\left(W_{R}\right)$ |


| Female crab discards $\left(n_{f}\right)$ and weight <br> $\left(w_{f}\right)$ |  |
| :--- | :--- |
| Pot lifts $(e)$ | Total Pot lifts $(E)$ |
| Total discards $\left(n_{d}=n_{\text {sub }}+n_{l d}\right)$ and <br> weight $\left(w_{d}=w_{\text {sub }}+w_{l d}\right)$ | $N A$ |
| Total catch $\left(n_{t}=n_{\text {sub }}+n_{l d}+n_{r}\right)$ and <br> weight $\left(w_{t}=w_{s u b}+w_{l d}+w_{r}\right)$ | $N A$ |
| Discards CPUE $\left(C p u e_{d}=n_{d} / e\right)$ and by <br> weight $\left(C p u e_{d}=w_{d} / e\right)$ | NA |
| Total catch CPUE $\left(C p u e_{t}=n_{l} / e\right)$ and <br> by weight $\left(C p u e_{t}=w_{d} / e\right)$ | NA |
| Discards <br> by wetain ratio $\left(r_{d}=n_{d} / n_{r}\right)$ and <br> by $\left(r_{d}=w_{d} / n_{r}\right)$ | NA |
| Discards size composition $\left(p_{d i s, l}\right)$ | $N A$ |

Note: female discards are not included because the NSRKC assessment model is male-only model.

## LNR method

LNR method simply expands observed discards CPUE (cpued $\boldsymbol{d}_{\boldsymbol{d}}$ to total pot lifts. This method assumes that discarded crab are accurately accounted for and that observed discards CPUE (cpue ${ }_{d}$ ) is representative of all fishermen.

$$
\begin{equation*}
\text { cpue }_{d}=\frac{n_{d}}{e} \quad D_{L N R}=c p u e_{d} \cdot E \tag{1}
\end{equation*}
$$

## LNR2 method

Observer bias corrected LNR method (LNR2) acknowledges that the observer discard CPUE may not be representative of all fishermen. Thus the CPUE is adjusted via taking retained CPUE by observed fishermen to all fishermen as follows:

$$
\text { Observed vessel retained catch } C P U E_{R, s}=\frac{N_{R . s}}{E_{s}} \quad \text { Entire fleet retained catch } C P U E_{R}=\frac{N_{R}}{E}
$$

Where $N_{R . s}$ and $E_{s}$ are total number of retained crab and pot lifts of the observed fishermen from the fish ticket database, and $N_{R}$ and $E$ total number of retained crab and pot lifts by all fishermen. Then

$$
\begin{equation*}
D_{L N R 2}=\left(\frac{C P U E_{R}}{C P U E_{R, s}}\right) \cdot D_{L N R}=\left(\frac{N_{R}}{E \cdot C P U E_{R, s}}\right) \cdot \text { cpue }_{d} \cdot E=\frac{c p u e_{d}}{C P U E_{R, s}} N_{R}=r_{L N R 2} \cdot N_{R} \tag{2}
\end{equation*}
$$

## Subtraction method

Subtraction method expands total catch CPUE and subtracts total retained catch. This method does NOT assume accurate discarded crab but assume accurate total catch crab

$$
\text { cpue }_{t}=\frac{n_{t}}{e} \quad D_{\text {Sub }=\text { cuep }_{t} \cdot E-N_{R} .}
$$

## Subtraction2 method

Similar to LNR2, bias corrected Subtraction method is simply bias corrected total catch minus retained catch

$$
\begin{equation*}
D_{\text {Sub } 2}=\left(\frac{C P U E_{R}}{C P U E_{R, s}}\right) \cdot \text { cpue }_{t} \cdot E-N_{R}=\left(\frac{\text { cpue }_{t}}{C P U E_{R, s}}-1\right) \cdot N_{R}=r_{s u b 2} \cdot N_{R} \tag{3}
\end{equation*}
$$

## Ratio method

The ratio method uses the identical method used in the assessment model, that multiplies the observed discards to retained catch ratio with total retained catch. This method assumes observed discards to retained ratio is accurate and representative.

$$
\begin{equation*}
D_{\text {ratio }}=\frac{n_{d}}{n_{l r}} N_{R}=r_{d} \cdot N_{R} \tag{4}
\end{equation*}
$$

## Estimation of discard mortality biomass

One of the main objectives of estimating discard is calculating discard mortality biomass $\left(M b_{d i s}\right)$ that is calculated as follows

$$
\begin{equation*}
M b_{d i s}=0.2 \cdot D_{n} \cdot W_{d i s} \tag{5}
\end{equation*}
$$

where, $D_{n}$ is the number of discards, $W_{\text {dis }}$ is average weight discarded crab, and 0.2 is assumed handling mortality rate.
$W_{\text {dis }}$ is calculated as

$$
\begin{equation*}
W_{d i s}=\sum_{l} p_{d i s, l} \cdot w m_{l} \tag{6}
\end{equation*}
$$

where $p_{\text {dis }, l}$ is the proportion of discarded crab size class $(l)$ and $w m_{l}$ is average weight (lb) for each size class (Table 3).

## Direct discard mortality biomass estimation method

Alternatively, the above methods can be converted directly to biomass using observed weights $w_{d}$ and $w_{r}$ or by using the equation (6), such that

$$
\begin{aligned}
& w_{d}=n_{d} \sum_{l} p_{d i s, l} \cdot w m_{l}, w_{r}=n_{r} \sum_{l} p_{r, l} \cdot w m_{l}, w_{t}=w_{d}+w_{r,} \\
& C P U E_{R, s}=\frac{W_{R . s}}{E_{s}}, \quad \quad C P U E_{R}=\frac{W_{R}}{E}
\end{aligned}
$$

Then all the above 5 methods can be converted to

## LNR.lb method

$$
\text { cpue }_{d}=\frac{w_{d}}{e} \quad M b_{L N R}=0.2 \cdot \text { cpue }_{d} \cdot E
$$

## LNR2.lb method

$$
M b_{L N R 2}=0.2 \cdot \frac{c p u e_{d}}{C P U E_{R, S}} W_{R}=0.2 \cdot r_{L N R 2} \cdot W_{R}
$$

Sub.lb method

$$
\text { cpue }_{t}=\frac{w_{t}}{e} \quad M b_{\text {Sub }}=0.2 \cdot\left(\text { cpue }_{t} \cdot E-W_{R}\right)
$$

## Sub2.lb

$$
M b_{S u b 2}=\left(\frac{c p u e_{t}}{C P U E_{R, s}}-1\right) \cdot W_{R}=0.2 \cdot r_{s u b 2} \cdot W_{R}
$$

## Ratio.lb

$$
M b_{\text {ratio }}=0.2 \frac{w_{d}}{w_{r}} W_{R}=0.2 \cdot r_{\text {ratio }} \cdot W_{R}
$$

## Results

Overall subtraction method appeared to give higher discard mortality than other methods. Between the number and lb methods, LNR and LNR.lb methods were identical, and discrepancies were under $5 \%$ for LNR2 and ratio methods. On the other hand, subtraction method (Sub, Sub2) had $+/-60 \%$ differences.

## Discussion

As stated, the NSRKC observer survey was not designed or intended to estimate discards, and this estimation was conducted at the request of the CPT and SSC. Methods using CPUE (LNR, LNR2, Sub, Sub2) assumes that observed vessels are representative of the entire fleet. Difference between LNR and Subtraction method is that LNR method assumes that observed discards are accurate whereas subtraction method assumes that observed discards are biased but observed total catches are accurate. On the other hand, the ratio method assumes that observed discard proportions would represent total proportion or that every fisherman has a similar crab composition.

Estimates of discarded crab are more likely to be accurate on the observed vessels because retained and discarded crab are distinguished in cooperation with the fishermen. However, these estimates are likely biased low relative to the entire fleet because of the fact that observer coverage is voluntary and generally limited to larger boats which are generally more efficient in catching legal crab with fewer discards than those with small boats. In addition, fisherman may volunteer for observer coverage when catches are anticipated to be high. This is generally supported by fish ticket data where total season retained catch CPUE is generally higher by observed fishermen than unobserved fishermen (Table 2a,b). and retained catch CPUE is generally higher during periods when observers are on board. When observers were on board, fishermen went to different fishing areas from the rest of the fleet including those without observers (Table 4). Because of this nonuniformity in fishing behavior, total catch and discard estimation for the entire fishery is likely inaccurate and difficult to evaluate including the directionality of the bias. In the absence of TRUE observation, relative accuracies of the estimates among the 10 methods were highly uncertain. Furthermore, in the absence of objective criteria for selecting a method for estimation, it is difficult to choose the most appropriate method for the NSRKC fishery.

Table 1a. Observed pot lifts, catch, and total pot lifts and catch from 2012 to 2019

| Observer Survey |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Year | $\begin{gathered} \hline \text { Pot } \\ \text { lifts } \\ E \\ \hline \end{gathered}$ | Sublegal $n_{\text {sub }}$ | $\begin{gathered} \hline \text { Legal } \\ \text { retained } \\ n_{r} \\ \hline \end{gathered}$ | $\qquad$ | Female $n_{f}$ | Discarded $l b$ | Retained $l b$ |
| 2012 | 82 | 1,025 | 1,112 | 177 | 155 | 1,404 | 3,210 |
| 2013 | 190 | 2,647 | 2,109 | 258 | 120 | 2,648 | 6,172 |
| 2014 | 141 | 1,472 | 1,752 | 315 | 103 | 2,684 | 5,252 |
| 2015 | 69 | 969 | 1,676 | 577 | 224 | 2,635 | 4,495 |
| 2016 | 67 | 264 | 1,700 | 169 | 877 | 710 | 4,840 |
| 2017 | 108 | 432 | 2,174 | 122 | 373 | 845 | 6,731 |
| 2018 | 77 | 547 | 1,095 | 10 | 573 | 678 | 3,583 |
| 2019 | 28 | 123 | 142 | 1 | 89 | 116 | 432 |

Table 1b Fish tickets

|  | All fishermen |  |  | Sampled fishermen |  |  |  |  |
| :---: | ---: | :---: | ---: | ---: | :---: | :---: | :---: | :---: |
|  | pot lifts | Retained | Retained | pot lifts |  | Retained |  | Retained |
| Year | $E$ | $N_{R}$ | lb | $E_{S}$ | $N_{R s}$ | lb |  |  |
| 2012 | 10,041 | 161,113 | 475,990 | 3,595 | 52,185 | 154,444 |  |  |
| 2013 | 15,058 | 130,603 | 391,863 | 7,545 | 74,466 | 223,725 |  |  |
| 2014 | 10,124 | 129,656 | 389,004 | 3,729 | 53,741 | 161,573 |  |  |
| 2015 | 8,356 | 144,224 | $4,011,112$ | 2,323 | 49,986 | 138,936 |  |  |
| 2016 | 8,009 | 138,997 | 420,159 | 1,882 | 45,225 | 135,581 |  |  |
| 2017 | 9,401 | 135,322 | 411,736 | 2,079 | 37,767 | 116,701 |  |  |
| 2018 | 8,797 | 89,613 | 298,396 | 2,494 | 26,031 | 88,095 |  |  |
| 2019 | 5,436 | 24,913 | 75,023 | 949 | 4,458 | 13,114 |  |  |

Table 2a. Estimated quantity: number method

| Year | cpue $_{d}$ | cpue $_{t}$ | CPUE $_{R, s}$ | $C P U E_{R}$ | $r_{L N R 2}$ | $r_{\text {sub2 }}$ | $r_{d}$ |
| :---: | ---: | ---: | ---: | ---: | ---: | ---: | :---: |
| 2012 | 14.66 | 28.22 | 14.52 | 16.05 | 1.01 | 0.94 | 1.08 |
| 2013 | 15.29 | 26.39 | 9.87 | 8.67 | 1.55 | 1.67 | 1.38 |
| 2014 | 12.67 | 25.10 | 14.41 | 12.80 | 0.88 | 0.74 | 1.02 |
| 2015 | 22.41 | 46.70 | 21.52 | 17.26 | 1.04 | 1.17 | 0.92 |
| 2016 | 6.46 | 31.84 | 24.03 | 17.36 | 0.27 | 0.32 | 0.25 |
| 2017 | 5.13 | 25.26 | 18.17 | 14.33 | 0.28 | 0.39 | 0.25 |
| 2018 | 7.23 | 21.45 | 10.44 | 10.19 | 0.69 | 1.06 | 0.51 |
| 2019 | 4.43 | 9.50 | 4.70 | 4.58 | 0.94 | 1.02 | 0.87 |

Norton Sound red king crab CPUE standardization

| Average | 11.0 | 26.81 | 14.71 | 12.66 | 0.83 | 0.92 | 0.79 |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |

Table 2b. Estimated quantities: lb method

| Year |  | cpue $_{d}$ | cpue $_{t}$ | CPUE $_{R, s}$ | CPUE $_{R}$ | $r_{L N R 2}$ | $r_{\text {sub2 }}$ |
| ---: | ---: | ---: | ---: | ---: | :---: | :---: | :---: |

Table 3 discarded crab size proportions $\left(p_{\text {dis, }, t}\right)$ and calculated $W_{\text {dis }}$.

| Size class | 34 | 44 | 54 | 64 | 74 | 84 | 94 | 104 | 114 | 124 | 134 | $W_{\text {dis }}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Average weight (lb) ( $\mathrm{wm}_{\mathrm{l}}$ ) | 0.09 | 0.18 | 0.32 | 0.52 | 0.82 | 1.20 | 1.70 | 2.32 | 2.99 | 3.69 | 4.37 |  |
| 2012 | 0.00 | 0.01 | 0.12 | 0.20 | 0.12 | 0.16 | 0.28 | 0.10 | 0.01 | 0.00 | 0.00 | 1.17 |
| 2013 | 0.00 | 0.02 | 0.11 | 0.29 | 0.25 | 0.14 | 0.15 | 0.04 | 0.00 | 0.00 | 0.00 | 0.91 |
| 2014 | 0.00 | 0.00 | 0.01 | 0.04 | 0.10 | 0.27 | 0.43 | 0.13 | 0.01 | 0.00 | 0.00 | 1.50 |
| 2015 | 0.00 | 0.00 | 0.00 | 0.02 | 0.08 | 0.18 | 0.47 | 0.21 | 0.03 | 0.01 | 0.00 | 1.70 |
| 2016 | 0.00 | 0.00 | 0.01 | 0.04 | 0.05 | 0.17 | 0.53 | 0.18 | 0.02 | 0.00 | 0.00 | 1.64 |
| 2017 | 0.00 | 0.00 | 0.02 | 0.10 | 0.16 | 0.14 | 0.30 | 0.26 | 0.01 | 0.00 | 0.00 | 1.53 |
| 2018 | 0.00 | 0.00 | 0.04 | 0.09 | 0.18 | 0.36 | 0.30 | 0.02 | 0.00 | 0.00 | 0.00 | 1.22 |
| 2019 | 0.02 | 0.05 | 0.18 | 0.24 | 0.10 | 0.12 | 0.27 | 0.02 | 0.00 | 0.00 | 0.00 | 0.93 |
| Average | 0.00 | 0.01 | 0.06 | 0.13 | 0.13 | 0.19 | 0.34 | 0.12 | 0.01 | 0.00 | 0.00 | 1.33 |

Table 4. The number of discarded crab estimated by 5 methods via number method.

| Year | $D_{L N R}$ | $D_{L N R 2}$ | $D_{\text {Sub }}$ | $D_{\text {Sub2 }}$ | $D_{\text {ratio }}$ |
| ---: | ---: | ---: | ---: | ---: | ---: |
| 2012 | 147,186 | 154,492 | 122,239 | 136,303 | 174,153 |
| 2013 | 230,229 | 202,324 | 266,770 | 230,229 | 179,896 |
| 2014 | 128,347 | 114,021 | 124,525 | 128,347 | 132,246 |
| 2015 | 187,223 | 150,175 | 245,965 | 187,223 | 133,037 |
| 2016 | 51,760 | 37,382 | 115,976 | 51,760 | 35,403 |
| 2017 | 48,424 | 38,212 | 103,125 | 48,424 | 34,484 |
| 2018 | 63,635 | 62,107 | 99,123 | 63,635 | 45,584 |
| 2019 | 24,074 | 23,486 | 26,729 | 24,074 | 21,755 |

Table 5a. Discard mortality (lb) by 5 methods via number method.

| Year |  | $L N R$ | LNR2 | Sub | Sub2 |
| ---: | ---: | ---: | ---: | ---: | ---: |
|  | Ratio |  |  |  |  |
| 2012 | 34,395 | 36,102 | 28,565 | 31,851 | 40,696 |
| 2013 | 41,969 | 36,882 | 48,630 | 41,969 | 32,794 |
| 2014 | 38,560 | 34,256 | 37,411 | 38,560 | 39,731 |
| 2015 | 63,815 | 51,187 | 83,837 | 63,815 | 45,345 |
| 2016 | 16,968 | 12,255 | 38,020 | 16,968 | 11,606 |
| 2017 | 14,773 | 11,658 | 31,462 | 14,773 | 10,521 |
| 2018 | 15,492 | 15,120 | 24,131 | 15,492 | 11,097 |
| 2019 | 4,496 | 4,386 | 4,992 | 4,496 | 4,063 |

Table 5b. Discard mortality (lb) by 5 methods via weight method.

| Year |  | LNR.lb | LNR2.lb | Sub.lb | Sub2.lb |
| ---: | ---: | ---: | ---: | ---: | ---: |
| Ratio.lb |  |  |  |  |  |
| 2012 | 343,95 | 37,952 | 17,817 | 29,507 | 41,647 |
| 2013 | 41,969 | 36,833 | 61,419 | 44,313 | 33,624 |
| 2014 | 38,560 | 34,184 | 36,199 | 23,264 | 39,766 |
| 2015 | 63,815 | 51,218 | 92,456 | 58,370 | 47,025 |
| 2016 | 16,968 | 12,356 | 48,652 | 12,590 | 12,322 |
| 2017 | 14,773 | 11,479 | 50,099 | 20,564 | 10,338 |
| 2018 | 15,492 | 14,877 | 37,693 | 33,826 | 11,291 |
| 2019 | 4,496 | 4,490 | 6,267 | 6,239 | 4,021 |



Discard mortality biomass: number method

Figure 1. Discarded crab mortality biomass estimated by 5 proposed methods.

## Discards Estimate without observer survey

Total catch OFL-ABC of NSRKC have been calculated since adoption of the NSRKC assessment model; however, it was not adopted because of the lack of discard estimate. Total catch OFL-ABC for NSRKC was set for the first time in 2020 based on the fact that discards could be estimated for 2012-2019, but in the same year the NSRKKC fishery observer program was terminated. This made it impossible to assess annual catch limit (ACL) overage for the NSRKC fishery. This prompted request by CPT-SSC to explore a method to estimate discards with NO DATA. Given that the NSRKC observer survey was not intended to estimate discards, developing a method is highly speculative.

There are 3 general approaches estimating discards for future fisheries in the absence of observer data:

1. Apply averages on observed retained catch and effort
2. Predict discards from observed retained catch and effort
3. Predict discards from observed crab size composition

## Approaches 1 \& 2

Approach 1

1. Apply averages of cpue $_{d}$, cupe $_{t}, r_{L N R 2}, r_{s u b 2}$ and $r_{d}$ of the lb method (Table 2b)
2. Calculate average discards mortality/retained weight ratio of the 2012-2019 surveys.

Table 6: discard mortality weight/retained weight ratio of the 5 estimation methods.

| Year | LNR | LNR2 | Sub | Sub2 | Ratio |
| ---: | ---: | ---: | ---: | ---: | ---: |
| 2012 | 0.072 | 0.080 | 0.037 | 0.062 | 0.087 |
| 2013 | 0.107 | 0.094 | 0.157 | 0.113 | 0.086 |
| 2014 | 0.099 | 0.088 | 0.093 | 0.060 | 0.102 |
| 2015 | 0.159 | 0.128 | 0.230 | 0.146 | 0.117 |
| 2016 | 0.040 | 0.029 | 0.116 | 0.030 | 0.029 |
| 2017 | 0.036 | 0.028 | 0.122 | 0.050 | 0.025 |
| 2018 | 0.052 | 0.050 | 0.126 | 0.113 | 0.038 |
| 2019 | 0.060 | 0.060 | 0.084 | 0.083 | 0.054 |
| Average | 0.078 | 0.070 | 0.121 | 0.082 | 0.067 |

Approach 2: Construct a linear regression of predicting cpue $_{d}$, cupe $_{t}, C P U E_{R s}$, and $r_{c}$ from observed $C_{P U E}$.

Table 7: linear regression equation

|  | Regression equation | $R^{2}$ |
| :--- | :--- | :---: |
| cpue $_{d}$ | cpue $_{d}=0.4037+0.3834 C P U E_{R}$ | 0.22 |
| cpue $_{t}$ | cpue $_{t}=-1.5427+1.655 C P U E_{R}$ | 0.74 |
| CPUE $_{R s}$ | CPUEE | $=-6.2385+1.3271 C P U E_{R}$ |
| $r_{d}$ | No correlation | 0.87 |

In 2022, total potlift (E) was 5154, and total number of retained crab was 125042 , total weight was 317173 , and $C P U E_{R}$ was 61.54 . Applying those, estimated quantities are as follows.

Table 8: average and predicted quantities for 2022 fishery

|  | Average | Regression |
| :--- | ---: | ---: |
| cpue $_{d}$ | 14.96 | 24.00 |
| cpue $_{t}$ | 61.27 | 100.30 |
| CPUE $_{R s}$ |  | 75.43 |
| $r_{L N R 2}$ | 0.35 | 0.32 |
| $r_{\text {sub2 }}$ | 0.41 | 0.33 |
| $r_{d}$ | 0.34 |  |

Applying those to the equations, estimated discard mortality biomass (lb) of 2022 was
Table 9: The number of discards and regression method.

|  | LNR | LNR2 | Sub | Sub2 | Ratio |
| ---: | :---: | :---: | ---: | ---: | :--- |
| Regression | 24,737 | 20,181 | 199,797 | 104,594 |  |
| Average | 15,416 | 22,055 | -272 | 26,041 | 21,355 |
| Average lb | 24,806 | 22,055 | 38,261 | 26,041 | 21,355 |

## Approach 3: Predict discards from observed trawl survey crab size composition

Trawl survey selectivity method uses the same method for estimating discards (Appendix A, equations 8). Trawl survey length proportion data as a proxy for true length proportions. The model estimated trawl survey selectivity is 1.0 for all lengths. This assumes that trawl survey length composition equals NSRKC length proportion subject to fishery.

Discards length proportion $p_{\text {dis,l }}$ can be estimated by multiplying model estimated fishery selectivity $\left(S_{l}\right)$ and 1-retention probability $\left(S_{\text {ret, },}\right)$

$$
p_{\text {dis }, l}=p_{t w l, l} \cdot S_{l} \cdot\left(1-S_{\text {ret }, l}\right)
$$

Then calculate discards-retained ratio $\left(r_{d i s}\right)$ as

$$
r_{d}=\frac{\sum_{l} p_{t w l, l} \cdot S_{l} \cdot\left(1-S_{r e t, l}\right)}{\sum_{l} p_{t w l, l} \cdot S_{l} \cdot S_{r e t, l}}
$$

The discard biomass unit ( $w_{d i s}$ ) is

$$
W_{d i s}=\frac{\sum_{l} p_{t w l, l} \cdot S_{l} \cdot\left(1-S_{r e t, l}\right) \cdot w m_{l}}{\sum_{l} p_{t w l, l} \cdot S_{l} \cdot\left(1-S_{r e t, l}\right)}
$$

During the 2012-2019 periods, trawl survey occurred in 2014, 2017, 2018, and 2019. The table below shows trawl survey length proportion, and model estimated selectivity and retention probability from the 2021 assessment model

Table 10: Table: trawl survey size composition, fishery size selectivity $\left(S_{l}\right)$, retention probability ( $S_{\text {ret }}$ ), and estimated discard size composition.

| Size | 34 | 44 | 54 | 64 | 74 | 84 | 94 | 104 | 114 | 124 | 134 |
| :--- | ---: | ---: | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| Trawl |  |  |  |  |  |  |  |  |  |  |  |
| 2014 | 0.01 | 0 | 0.01 | 0.01 | 0.07 | 0.14 | 0.25 | 0.27 | 0.14 | 0.06 | 0.02 |
| 2017 | 0.11 | 0.02 | 0.01 | 0.06 | 0.12 | 0.11 | 0.06 | 0.09 | 0.13 | 0.23 | 0.07 |
| 2018 | 0.02 | 0.33 | 0.42 | 0.08 | 0.05 | 0.02 | 0.02 | 0.01 | 0.01 | 0.01 | 0.02 |
| 2019 | 0 | 0 | 0.02 | 0.13 | 0.47 | 0.26 | 0.04 | 0.02 | 0.01 | 0.02 | 0.03 |
| 2022 | 0.12 | 0.03 | 0.04 | 0.14 | 0.15 | 0.15 | 0.14 | 0.12 | 0.07 | 0.03 | 0.01 |
| $S_{l}$ | 0 | 0.01 | 0.04 | 0.12 | 0.33 | 0.64 | 0.86 | 0.96 | 0.99 | 1 | 1 |
| $S_{\text {ret }}$ | 0 | 0 | 0 | 0 | 0 | 0 | 0.07 | 0.88 | 1 | 1 | 1 |
| Discard |  |  |  |  |  |  |  |  |  |  |  |
| 2014 | 0 | 0 | 0.00 | 0.00 | 0.07 | 0.26 | 0.58 | 0.09 | 0 | 0 | 0 |
| 2017 | 0 | 0 | 0.00 | 0.04 | 0.22 | 0.40 | 0.27 | 0.00 | 0 | 0 | 0 |
| 2018 | 0 | 0.04 | 0.22 | 0.13 | 0.22 | 0.17 | 0.21 | 0.02 | 0 | 0 | 0 |
| 2019 | 0 | 0 | 0.00 | 0.04 | 0.42 | 0.45 | 0.09 | 0.01 | 0 | 0 | 0 |
| 2022 | 0 | 0.00 | 0.01 | 0.06 | 0.17 | 0.32 | 0.39 | 0.05 | 0 | 0 | 0 |

Comparing the estimated with observed, the estimated $r_{d}$ tend to be higher than observed, especially 2018 and 2019.

Table 11 Comparisons of parameters between trawl survey method and ratio (number) method.

|  | $r_{d}$ | $W_{\text {dis }}$ | Ob. $r_{d}$ | Ob. $W_{\text {dis }}$ | Pred <br> $M b_{\text {dis }}$ | Ob. <br> $M b_{\text {dis }}$ |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: |
| 2014 | 0.75 | 1.57 | 1.00 | 1.50 | 30,300 | 38,967 |
| 2017 | 0.35 | 1.28 | 0.25 | 1.53 | 12,060 | 11,748 |
| 2018 | 1.54 | 0.92 | 0.51 | 1.22 | 25,238 | 10,421 |
| 2019 | 4.70 | 1.05 | 0.87 | 0.93 | 24,842 | 10,852 |
| 2022 | 1.40 | 1.34 |  |  | 47,024 |  |

## Comparison of methods

Putting the above methods together, 21 discard catch mortality were calculated. Total catch ranged from 0.35 to 0.39 million lb and below ABC of 0.4 million lb .

Table 12 estimates of 2022 total catch based on the 15 methods.

|  | 2022 Total Catch <br> (million lb) |
| :--- | :--- |
| Regression |  |
| LNR | 0.36 |
| LNR2 | 0.36 |
| Sub | 0.54 |
| Sub2 | 0.44 |
| Average |  |
| LNR | 0.35 |
| LNR2 | 0.36 |
| Sub | 0.34 |
| Sub2 | 0.37 |
| Ratio | 0.36 |
| Average lb |  |
| LNR | 0.36 |
| LNR2 | 0.36 |
| Sub | 0.38 |
| Sub2 | 0.37 |
| Ratio | 0.36 |
| Trawl | 0.39 |

## Discussion

As presented the above, overage of ACL is highly depended on ad hoc estimation methods being selected. This suggests that a method has to be selected on the merit of scientific accuracy and precision before total catch is calculated. The 15 alternatives presented the above are examples and there could be alternative methods that would provide more accurate and precise estimates. Same as the discussion regarding selecting a method for estimating discards with data, objective criteria for selecting a method for estimating discards without data are not established, and thus author's recommendation is not provided.

Regardless the method being ultimately selected, a question of jurisprudence should be answered first: "should ACL overage that has significant regulatory consequences be determined by an estimate based on NO data?"

The total ABC of NSRKC is calculated as

$$
\text { Total } \mathrm{ABC}=\mathrm{ABC} \_ \text {Buffer } \cdot(\text { retained } \mathrm{OFL}+0.2 \cdot \text { discards } \mathrm{OFL})=M b_{R . p}+M b_{d i s, p}
$$

Based on the preseason $\mathrm{ABC}, \mathrm{GHL}$ is determined as

$$
\mathrm{GHL}<\mathrm{ABC} \text { _Buffer } \cdot\left(\text { retained OFL) }=M b_{R . p}\right.
$$

Which assumes that discards morality $\left(M b_{d i s}\right)$ would be

$$
M b_{d i s}=\frac{M b_{d i s, p}}{M b_{R, p}} \cdot M b_{R}
$$

And thus, the postseason total catch $\left(M b_{R}+M b_{d i s}\right)$ would be less than ABC unless $M b_{R}$ far exceeds GHL.

In reality; however, the projected discard mortality do not always match the observed one. During the 2012-2019 period, observed ratio of discard mortality/retained was up to 8.75 times greater than projected (Table ).

Table: Projected and observed mort_lb and "observed" /predicted mort_lb $b_{b}$ ratio during the 2012-2019 fisheries.

|  | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| Projected | 0.010 | 0.019 | 0.028 | 0.045 | 0.047 | 0.042 | 0.037 | 0.059 |
| Retrospective | 0.062 | 0.091 | 0.110 | 0.069 | 0.035 | 0.029 | 0.039 | 0.083 |
| Observed |  |  |  |  |  |  |  |  |
| Obs. LNR | 0.072 | 0.107 | 0.099 | 0.159 | 0.040 | 0.036 | 0.052 | 0.060 |
| Obs. LNR2 | 0.080 | 0.094 | 0.088 | 0.128 | 0.029 | 0.028 | 0.050 | 0.060 |
| Obs. Sub | 0.037 | 0.157 | 0.093 | 0.230 | 0.116 | 0.122 | 0.126 | 0.084 |
| Obs. Sub2 | 0.062 | 0.113 | 0.060 | 0.146 | 0.030 | 0.050 | 0.113 | 0.083 |
| Obs. Ratio | 0.087 | 0.086 | 0.102 | 0.117 | 0.029 | 0.025 | 0.038 | 0.054 |
| Ob/Project ratio |  |  |  |  |  |  |  |  |
| Retrospective | 6.20 | 4.79 | 3.93 | 1.53 | 0.74 | 0.69 | 1.05 | 1.41 |
| LNR | 7.23 | 5.64 | 3.54 | 3.54 | 0.86 | 0.85 | 1.40 | 1.02 |
| LNR2 | 7.97 | 4.95 | 3.14 | 2.84 | 0.63 | 0.66 | 1.35 | 1.01 |
| Sub | 3.74 | 8.25 | 3.32 | 5.12 | 2.46 | 2.90 | 3.41 | 1.42 |
| Sub2 | 6.20 | 5.95 | 2.14 | 3.23 | 0.64 | 1.19 | 3.06 | 1.41 |
| Ratio | 8.75 | 4.52 | 3.65 | 2.61 | 0.62 | 0.60 | 1.02 | 0.91 |

For 2022, projected mort 1 lb was 0.058 and retrospective (model 21.0 ) mort 1 lb was 0.065 , which can be translated into projected and retrospective total catch of 0.36 million lb.

