

GOA Pollock

Annual Catch Limits (ACLs)

The two groundfish FMPs include a suite of catch limits for individual groundfish stocks and stock complexes. These catch limits include an overfishing limit (OFL), an allowable biological catch limit (ABC), and a total allowable catch limit (TAC); where $TAC < ABC < OFL$. The OFL and ABC are set by the SSC, and the TAC is set by the Council. The SSC sets ABC below the OFL to account for scientific uncertainty in calculating the OFL and sets TAC not to exceed the ABC to account for management uncertainty in controlling a fishery's actual catch. The groundfish ABC is the ACL, and TAC is a target set not to exceed the ABC. In-season accountability measures (AMs) are geared both to prevent the TAC from being exceeded (e.g., directed fishing closures) and to respond if the TAC is exceeded (e.g., prohibition of retention).

For GOA pollock, one OFL is specified for the combined Western (610), Central (620 and 630), and West Yakutat (640) regulatory areas and a separate OFL for Southeast outside. The ABC is set for the combined 610/620/630/640 area and then apportioned each area: 610, 620, 630, and 640. The TACs are set equal to the area ABCs.

In the GOA, the only species that has a reallocation between areas is pollock. The regulation (50 CFR 679.20(a)(5)(iv)(B)) allows unused pollock TAC to be reallocated if a seasonal allocation is not harvested. Any unharvested TAC is first reapportioned within an area and second apportioned from one area to another area(s) by the Regional Administrator. For example, if the area 610 allocation is not reached then 20% of the next season apportionment in 610 may first roll to the next season in 610 and if available another 20% can be reapportioned to areas 620 and 630. However, the reapportionment to 620 and 630 increases the TAC over the apportionment of the ABCs in 620 and 630, but not over the overall 610/620/630/640 ABC. The Regional Administrator often rolls pollock TAC (20% of the next seasonal allowance) from one season to the next season in the same regulatory area, but in the past few years the 610 pollock TAC has not been fully harvested. Without the ability to reapportion TAC to other areas quite a bit of pollock is "stranded." These reapportionment regulations were part of the early 2000s Steller sea lion measures to distribute harvest temporally and spatially while also allowing for unharvested pollock to be harvested in another season or area.

Regulation text at 50 CFR 679.20(a)(5)(iv)(B)

Within any fishing year, underharvest or overharvest of a seasonal apportionment may be added to or subtracted from remaining seasonal apportionments in a manner to be determined by the Regional Administrator, provided that any revised seasonal apportionment does not exceed 20 percent of the seasonal TAC apportionment for the statistical area. The reapportionment of underharvest will be applied to the subsequent season within the same statistical area up to the 20 percent limit specified in this paragraph. **Any underharvest remaining beyond the 20 percent limit may be further apportioned to the subsequent season in the other statistical areas, in proportion to estimated biomass and in an amount no more than 20 percent of the seasonal TAC apportionment for the statistical area.**

The GOA wide TACs have not been exceeded; however, TAC and the respective ABCs have been exceeded within regulatory areas in some years.

Information on the rationale for the area apportionment in the GOA is not available, but it is thought to be that the reason for the smaller area apportionments in the GOA compared to the BSAI was to control the foreign fleets prior to MSA. In the GOA there was a few domestic groundfish harvests (i.e. SE sablefish) while in the BSAI there were none.

The 2012 stock assessment states:

With the possible exception of the split between the Eastern GOA and the Central/Western GOA, **the current spatial and seasonal apportionment procedure for pollock in the GOA was not developed to account for stock structure.** Overfishing levels are set at the stock level, and ABCs are used to manage harvest for regional subareas to reduce impacts on Steller sea lions. Harvesting proportionate to biomass is considered to provide the least impact on Steller sea lions. Source: stock assessment at <http://www.afsc.noaa.gov/REFM/Docs/2012/GOApollock.pdf>

Proposed Solutions

Alternative 1. The SSC clarifies that an overage of the area ABCs is not a conservation issue and any reapportionment of the TAC between the areas 610, 620, 630, and 640 would not be considered exceeding an area ABC.

Alternative 2. Change the name of area ABCs to apportionment of the ABC or subarea-ABCs.

In the harvest specifications the apportionments of the ABC are called ABC. If they were called an apportionment of the ABC in the harvest specifications, this would help clarify the Alaska Region's definition of the ACL as the ABC area apportionments summed to the area that the OFL is specified.

The SSC would still set the combined Western/Central/West Yakutat ABC and the area apportionments. The Council would still set the overall TAC and area TACs less than or equal to the overall ABC and ABC apportionments. NMFS would still manage catch to not exceed the TAC, except for allowed under the GOA pollock reapportionment regulations.

Any reapportionment of the area TAC would not exceed the combined Western/Central/West Yakutat TAC or ABC. If the TAC in an area(s) is increased then the TAC in another area is decreased. Therefore, the SSC would not consider the increase to be an exceedance of the Western/Central/West Yakutat ABC.

2014 DISTRIBUTION OF POLLOCK IN THE CENTRAL AND WESTERN REGULATORY AREAS OF THE GOA; SEASONAL BIOMASS DISTRIBUTION, AREA APPORTIONMENTS; AND SEASONAL ALLOWANCES OF ANNUAL

TAC http://alaskafisheries.noaa.gov/sustainablefisheries/specs14_15/goatable3.pdf

Example of reapportionment for area 610.

1. 610 A season TAC is 100 mt
2. 610 A season catch is 50 mt, 50 mt remains unharvested
3. 610 B season TAC is 100 mt
4. 20% of the 610 B season TAC is 20 mt, since 20 mt is less than the 50 mt remaining unharvested in the A season allocation then 20 mt rolls to the B season in area 610 for a total B season TAC of 120 mt.

The remaining A season TAC unharvested, 50 mt, minus 20 mt that rolls to the B season leaves 30 mt; therefore another 20 mt (20% of the 610 B season TAC) may also be reapportioned to the 620 and 630 B season allocations. That leaves 10 mt of 610 unharvested pollock that does not get reapportioned to any area or “stays in the water”

Definition of Annual Catch Limit from the GOA FMP

Annual catch limit (ACL) is the level of annual catch of a stock or stock complex that serves as the basis for invoking accountability measures. ACL cannot exceed the ABC, and may be divided into sector-ACLs.

The ACL is equal to the ABC for each stock and stock complex in the “target species” category.