

**New England Fishery Management Council**

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MEMORANDUM

DATE: January 17, 2012
TO: Whiting Oversight Committee
FROM: Whiting PDT
SUBJECT: Amendment 19 advice

The Whiting PDT met on January 11, 2012 to review a preliminary draft Amendment 19 document and complete its analysis of management alternatives. Based on this review, the PDT offers the following advice that the Oversight Committee may consider to recommend preferred alternatives at the January 2012 Council meeting.

First and foremost, Amendment 19 includes the Annual Catch Limit (ACL) specifications and stock-wide accountability measures (AMs) that are in the Secretarial Amendment. The revised specifications in Amendment 19 include corrections to the transfers at sea and the discard mortality rate. Increases in 2010 northern stock red hake discards led to an increase in the discard mortality rate, however. The additional transfers at sea brought the rate down, but not enough to compensate for a near two-fold increase in discards. This increase appears to be real and it is reasonable to expect that the discard rate will continue into the 2012-2014 specification period. Although the discard rates currently differ from the Secretarial Amendment specifications, the PDT recommends adopting the ones in Draft Amendment 19 as preferred. It is anticipated that the final Secretarial Amendment will include the new corrections.

The PDT notes that monitoring small mesh area landings targets and AM triggers will be somewhat more difficult and less accurate than monitoring stock wide TALs. It is however possible to monitor the small mesh area AM triggers using weekly VTR reports. The potential benefit of this alternative is that it may reduce the effect of a directed small mesh fishery on other types of fishing where red hake may be discarded under the incidental limits. On the other hand, the small mesh area AM triggers would impose some additional costs to the directed small mesh fishery. Particularly in the case of the 400 lbs. red hake incidental possession limit (see below), the PDT does not believe the added potential benefit of the small mesh area AM triggers are worth the potential cost. The PDT therefore recommends the stock wide TALs and AMs as preferred and the small mesh area AM triggers as non-preferred.

For the southern stock area, the PDT feels that the quarterly TAL allocations and monitoring may be an unnecessary complication. The quarterly TALs and monitoring may be appropriate if the proposed TALs were much lower than recent landings, however, this is not the case. The PDT defers to the knowledge and advice of the industry advisors as to whether this measure should be preferred or not. In any case, the PDT recommends the quarterly TAL monitoring and adjustment through the roll-up, cumulative process described in the draft amendment document. The adjustment process developed by the advisors and Oversight Committee was modeled after the squid plan. This fishery is prosecuted by different vessels in different seasons, therefore, the PDT recommends that this alternative should be dropped from the draft amendment.

The PDT conducted an analysis of the effectiveness of the proposed in-season AMs, the incidental possession limits. They range from 200 to 400 lbs. for red hake and from 500 to 2000 lbs. for silver hake. The silver hake AMs could only be addressed through qualitative analysis, because the proposed Total Allowable Landings (TALs) have not been exceeded since 2000, when fishing conditions (regulatory, biological, and economic) were much different than today. Given that recent landings are a fraction of the proposed TALs, the PDT feels that a 2000 lbs. silver hake incidental possession limit would be sufficient as an AM. Furthermore, an incidental silver hake possession limit may be more effective at reducing catch than a red hake limit, because many of the small mesh hake trips rely more on silver hake for revenue than they do on red hake. It is unlikely that small mesh vessels would target red hake with a 2000 lbs. silver hake incidental possession limit.

The red hake incidental possession limits could be addressed with quantitative analysis, using 2006-2010 dealer data to identify and assess the potential effects on trips landing red hake. Although the results are sensitive to assumptions about whether trips would be made or fishing behavior changes to avoid catching red hake, there doesn't appear to be a lot of contrast between the effects on catch with a 200, 300, or 400 lbs. incidental red hake possession limit. The AM that uses a 400 lbs. possession limit would affect fewer trips and cause less additional discarding than the 200 lbs. possession limit. The PDT therefore recommends adoption of a 400 lbs. red hake incidental possession limit as preferred.

There are two annual monitoring processes as draft amendment alternatives, one requiring the Whiting PDT to prepare an annual monitoring report and another requiring NMFS to prepare an annual monitoring report, either one to be presented to the Council for its June meeting. This report would update landings, discards, and survey data to advise the Council about changes in the fishery and how the management measures are working. It would also determine whether there were overages that trigger post-season accountability measures. If this is the extent of the report, the PDT believes that the alternative having NMFS prepare the report will be sufficient and more efficient, as long as the Council has the latitude to have the PDT examine new issues if they arise.

Draft Amendment 19 also proposes year around possession limits for red hake by mesh size in the northern and southern stock areas. These possession limits differ by mesh size (similar to existing silver hake possession limits) and by stock area. The PDT thinks that these measures are a nice precaution to take in an ACL managed fishery, but has no information to determine its effect on size selectivity by the fishery.

Draft Amendment 19 proposes two types of post-season AMs: one that adjusts the in-season trigger point, reducing it from 90% to a lower value, and another that takes one for one pound reductions in the ACLs for prior overages. The PDT notes that either measure will primarily affect the directed fishery, even if the cause of the overage is an increase in discards by fisheries targeting other species. As currently proposed, the PDT therefore has no opinion on which post-season AM alternative should be preferred.