DRAFT

D5 BSAI O26 PSC

Diana Stram (NPFMC) presented a discussion paper about data considerations for developing an O26 performance standard for halibut in the BSAI. The paper provided an overview of halibut length and weight sampling methodology aboard vessels fishing in the BSAI, and the resulting data potentially available for assessing these same characteristics in PSC. Specific attention was given to data issues associated with deck sorting under an Exempted Fishing Permit (EFP). The document also provided halibut length and weight data from the IPHC setline survey, which has been proposed as a data source for evaluating O26 PSC aboard longline boats in the BSAI, as well as an overview of additional consideration associated with evaluating and implementing a performance standard. Public testimony was provided by John Gauvin (Alaska Seafood Cooperative), Heather McCarty (CBSFA), and Gerry Merrigan (Freezer Longline Coalition). Written comments were provided by John Gauvin.

The SSC thanks staff for providing a concise and informative document. The sampling methods, data availability, and major issues related to both were well described. In addition, the overview of consideration relative to creating a performance standard provided important context with implementation issues under a regulated performance standard. In this section, MSA national standards 1 (optimum yield) and 9 (minimize bycatch to the extent practicable) are referenced. The SSC recommends future versions of the analysis include reference to MSA national standard 8 (provide for the sustained participation of fishing communities and, to the extent practicable, minimize adverse economic impacts on such communities).

The SSC focused most of its discussion on issues associated the length composition data and sampling issues on EFP vessels, and the interaction of a performance standard with the halibut ABM evaluation currently underway.

Data and sampling issues

The SSC discussed differences in sampling methodology depending on whether a vessel was fishing under the authority of an EFP:

Non-EFP vessels: For vessels not fishing under the authority of the EFP, length data provided by fishery observers is likely adequate to grossly evaluate the length composition of halibut within a sector. The SSC notes that the methods used to collect length composition changed in 2016 not 2010 as indicated in the document. Prior to 2016, lengths were collected based on a nonrandom 20 halibut per day sampling protocol (sampled across hauls). After 2016, length data were randomly collected using systematic sampling of halibut within each haul. The 20 samples per day method resulted in sparse data within certain groupings, and haul-specific composition data is unavailable. This may be a consideration in future analysis for this or other uses of the halibut information.

The SSC also notes that in order to balance the need of careful release of halibut with data collection, the collection of weight data on groundfish longline vessels is imprecise. Observers

collect weight data from halibut released at the rail. This requires observes to visually estimate the total length of a halibut and assign that length to a 10 cm bin that has an associated weight that is calculated using the IPHC length weight conversion.

EFP Vessels: Under the first year of the EFP in 2015 halibut were sorted on deck and observers received only counts and total halibut PSC weight from the crew. Though this changed in 2016, complete length data is unavailable for the factory portion of halibut caught on EFP vessels fishing in 2016 and 2017. Bias in the overall length composition arises because the distribution of fish making it into the factory tend to be smaller than those deck sorted. Table 5 compared with Table 4 in the discussion paper illustrated this difference, noting that some of the differences could be caused by EFP vessels fishing in different locations than EFP vessels. However, length compositions presented by the Alaska Seafood Cooperative during public testimony also show substantial compositional differences between the factory and deck-sorted halibut. The SSC notes that representative length compositions will be available from the factory starting in 2018.

The SSC also expressed concerns about the sampling method used to collect halibut weights, which may be used to derive aggregated length frequency data. The current protocol for sampling aboard trawl vessels involves collection of weights from the first 15 fish, then from every 5th fish. Since the first 15 halibut are a nonrandom sample from a trawl haul, and there is additional manual sorting, this sampling design may lead to a bias in the size of fish included. The SSC noted that this did not appear to be standard practice for the sampling of trawl catches. Although this issue was not presented in detail in the discussion paper, the SSC suggested that the protocol or analysis be revised in the future to create a statistically unbiased result.

Based on these concerns, the SSC concluded that these data were not directly comparable across recent years and does not recommend that recent length compositions collected on EFP vessels are appropriate for the creation of an O26 performance standard.

Performance Standard and ABM measures

The SSC had a lengthy discussion about the implementation of a performance standard and defining associated objectives, and whether there is a relationship between the performance standard and the ABM measures being considered. The overarching issue is the lack of a defined objective - i.e., what is the problem/issue that the performance standard is intended to address? Without this direction, a discussion concerning the type of analysis required was not possible.

However, incorporating a performance standard will require a regulatory analysis that also considers analysis associated with the ABM measures. The SSC was concerned that many of the same issues that would need to be discussed in a regulatory analysis for the performance standard would be the same issues as those in the ABM, but without the benefit of the ABM tools and an understanding of how the O26 interacts with the ABM elements. **For this reason, the SSC recommends that any O26 measures be considered along with the ABM measures, not as a stand-alone analysis.**

In addition, during its June 2017 meeting, the SSC recommended that an O26 measure could be considered as a performance metric in the ABM process. As a performance metric, a well-defined O26 objective could be used to evaluate the behavior of O26 PSC catch in the context of other stock/harvest policy dynamics. Because the performance standard currently has no defined objectives, the SSC could not comment on what would be a reasonable performance metric, but suggested that reporting of O26 relative to total PSC could provide additional information for future evaluation. The SSC found the considerations section in the discussion paper to be particularly helpful and relevant in defining a potential standard or metric. Two important questions followed from this section: 1) whether the performance standard improves bycatch performance relative to objectives; and 2) whether industry can control factors that improve performance.