## Data limitations for individual allocations NPFMC Staff March 17, 2006

The Stakeholder Committee discussed limitations on the use of ADF&G charter halibut data for allocating catch history or effort history to individual charter halibut operators with agency staff at its February 2006 meeting. Limitations on the use of halibut data collected in the Saltwater Sportfishing Charter Vessel Logbook for 1998-2001 have been widely discussed and debated in the 2001 Preferred Alternative. In the end, the Council (through its Scientific and Statistical Committee) found that the data was the best available upon which to base individual share allocations.

The Council is considering new options to address "recency" by considering information on recent participants who did not meet the qualification criteria in the 2001 Preferred Alternative. Since the State stopped collecting charter halibut catch data in the logbooks in 2002, staff investigated possible proxies for the missing data. A leading candidate for estimating halibut participation was bottomfish (rockfish and ling cod) effort. While the State required all (including halibut) charter operators to report bottomfish harvest and effort by geographic area, a preliminary examination of logbooks since 2002 indicates that not all operators may have complied in 2002 (from a preliminary examination of the data), although compliance may have been better in more recent years. Further, discussions with industry participants have identified a segment of halibut charter operators who had no groundfish catch or effort, and did not fill out logbooks. The universe of this segment is unknown.

If the Council concurs that bottomfish logbook data for 2002-2005 are unsuitable for awarding catch or effort allocations to charter operators, then two possible have so far been identified. The Council could base individual allocations on criteria other then catch or effort. One hypothetical example follows. The Council could identify a qualifying period of 1997-2006. It could award ten percent of QS equally to all charter operators who could prove (any/bottomfish/halibut) participation through licenses/business records/other for each year of participation. This method would award longevity, but would not address individual history. Industry suggestions could finesse this approach to gain acceptance.

A second method, which was proposed by the State of Alaska, has been identified as an effort-based transferable seat program. While awaiting a general description of this approach from ADF&G staff at the March 2006 Stakeholder Committee meeting, it has been explained thus far as awarding trips instead of (numbers or pounds) of fish. ADF&G staff will report on whether data are available to implement such a program.

A third method was mentioned during the February 2006 Stakeholder meeting. To allow for the collection of adequate halibut data, the Council could table further development of a program to award individual shares until 2010, when three years of SWHS data could verify the accuracy of halibut data in ADF&G logbooks (see separate paper on possible Council action timelines (Tab V)).