

**C6(c) – Halibut Catch Sharing Plan  
December 12, 2011**

*The Council continues to support implementation of the Halibut Catch Sharing Plan (CSP) as the best approach to resolve longstanding allocation and management issues between the commercial and charter halibut sectors, as currently identified in the CSP Problem Statement.*

*The Council also recognizes that there are deficiencies in the current analysis that must be addressed before implementation can take place. Additionally, since 2008, changes in halibut management and the condition of the halibut stock have occurred, which will impact the effective implementation of the CSP as envisioned by the Council.*

**Motion:**

The Council provides the following policy guidance to NMFS on issues raised during the public comment period on the Halibut CSP Proposed Rule.

Comment 1: At this time the Council continues to support implementation of the CSP concurrently in Areas 2C and 3A. Supplemental analysis of and revisions to the CSP being requested in this motion are applicable to both management areas.

Comment 2: The Council agrees with NMFS' suggested response regarding the proposed method to adjust charter harvest estimates from the ADF&G mail survey using the non-GAF proportion of charter harvest reported in logbooks under the CSP.

Comment 3: The Council recommends using Method 3 to convert IFQ to GAF and for calculating an average GAF weight.

Comment 4: The Council recommends that the provision allowing charter operators to return GAF to an IFQ holder at any time during the season be removed from the CSP and that CSP retain the mandatory return date.

Comment 5: The Council agrees with NMFS' suggested response regarding the rationale for believing that charter overages and underages will balance out over time.

Comment 6: The Council agrees with NMFS' suggested response regarding the rationale for the range of +/- 3.5% around the harvest projections.

The Council requests additional analysis and revisions to the Halibut CSP that more specifically address a variety of public comments as outlined in the NMFS CSP report:

- Add a description of the status quo GHL allocations, such as a table of the stair step GHLs under different Total Area CEYs, and a comparison of the way in which annual allocations are made to the charter sector under both the GHL and the CSP.

- Revise the analysis so that it incorporates allocations at lower levels of abundance, and assesses the economic impacts, to the extent practicable, of the full range of allocations. Data from recent years should be used to determine what the charter and commercial allocations would have been under the CSP, and what management measures would have been in place.
- Add other indices to the analysis to describe the economic condition of the charter and commercial sectors over the last ten years. Examples for a typical charter and longline business in 2C and 3A could be provided. For the commercial sector, examples could include changes in QS prices and annual QS value, ex-vessel prices, and annual revenue. Consider differences between vessel classes, when QS was bought, etc. For the charter sector it could include permit prices (minimal data), number of trips and clients, and annual revenue.
- Review the IPHC process described in the CSP for deducting removals prior to applying the allocation percentages to the combined commercial/charter catch limit. The halibut charter stakeholder committee discussed “separate accountability”, in which each sector would be held accountable for its wastage of halibut. The CSP analysis currently deducts wastage in the commercial sector BEFORE the allocation percentages are applied. In 2011 the IPHC began deducting O26/U32 BAWM before setting catch limits, and this has allocative implications for 2C and 3A. Wastage estimates for the charter sector are not currently available, and so no deductions are made.
- Review the management matrix to determine whether management measures and the data employed are still appropriate in each tier given current charter harvests relative to combined fishery CEY, particularly in Area 3A.

The Council also seeks additional revisions to the Halibut CSP analysis to address the technical comments as outlined in the NMFS CSP report. This is a comprehensive list and it is understood that staff will work to address each of these points, to the extent practicable, in the next version of the Halibut CSP analysis.

With the direction provided above, the Council seeks to address the primary comments and concerns as outlined in the NMFS CSP Report and identified in public comment. It is the Council’s intent to review the additions and revisions to the modified Halibut CSP analysis in a subsequent meeting in order to determine what, if any, additional changes are necessary in order for the CSP to meet Council objectives. The Council also requests feedback from NMFS as to whether the additions and revisions to the CSP result in the need for a new proposed rule, so that the Council may establish a timeline for implementing the CSP.

Given the myriad of components involved in commercial and charter halibut management, the Council recognizes that there are management options available that were not included as part of the original Halibut CSP action. It is not the wish of the Council to delay implementation of the Halibut CSP any further than necessary. As such, the Council is asking for initiation of a discussion paper analyzing the following for potential use in future halibut management:

- The use of ADF&G logbooks for official harvest reporting

- Annual limits allowing for the retention of at least one fish of any size
- Restricting captain and crew retention of fish
- Trip limits, reverse slot limits, and two fish of a maximum size
- The use of a common pool purchase of QS by the charter sector
- Long-term management measures under Tier 1 of the CSP as identified in the Charter Halibut Implementation Committee Report

It is intended for this discussion paper to be reviewed by the Council following its review of the modified Halibut CSP. New and revised information received from review of the modified CSP will serve to refine the above discussion paper recognizing that full development of this discussion paper may be difficult until such information is received. At the time of review, the Council could determine whether to fold any of these new elements into the modified CSP and let others follow as a trailing amendment.