



NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

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Action Memo

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Dan Hull, Chairman
Chris Oliver, Executive Director

SUBJECT:
Charter Halibut Permit Usage - Discussion paper

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ACTION REQUIRED:
Review discussion paper, define issue and take action as necessary

BACKGROUND:
In December 2015, the Council requested a short discussion paper of feasible measures to limit the use of Charter Halibut Permits (CHPs) by persons who are not the permit holder ("leasing"), including a potential requirement for annual CHP renewal. The Council specifically asked for the following data by nontransferable and transferable permits and by International Pacific Halibut Commission (IPHC) Regulatory Area:

1. The number of unused CHPs since the CHPs were first issued, and the number of CHPs that were not used in each calendar year since implementation.
2. The number of CHPs used annually by a person other than the owner of the CHP.
3. The number of CHPs that have been used by more than one person during a calendar year.

Merging NMFS CHP holdings data and ADFG logbook data, this document responds to each of these three data requests. After addressing these three questions, the document reviews previous Council consideration of CHP leasing (for instance, through a previous discussion paper from December 2010; attached as an Appendix), and potential options to mitigate leasing, depending on Council policy goals.

In determining whether to further examine potential methods to limit the use of CHPs by persons who are not the permit holder ("leasing") with available information, the Council may want to consider the uncertainties in identifying and monitoring CHP use, the labor intensive nature of reconciling ADFG logbook data with NMFS CHP holding information, and the subjectivity of these determinations, in addition to other concerns discussed in this paper and the attached Appendix.

If the Council wishes to pursue additional action to limit the use of CHPs, the Council may want to clarify the problem that it wishes to address to focus further analysis and develop additional alternatives (e.g., identify specific types of CHP use by non-owners that it wishes to limit).