



NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

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Action Memo

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Dan Hull, Chairman
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SUBJECT:
Squid to Ecosystem Component Category - Initial Review

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ACTION REQUIRED:
Initial Review

BACKGROUND:

The Council will take initial review of an EA/RIR/IRFA to evaluate moving squid stocks in both the BSAI Groundfish FMP and the GOA groundfish FMP into the Ecosystem Component (EC) category. Under recently revised National Standard 1 guidelines, if a species does not require conservation and management, it may be moved into the "ecosystem component" (EC) category. Two alternatives are considered in this analysis:

Alternative 1 would continue to manage squids in both the BSAI and GOA groundfish FMPs as a target species. OFL, ABC, and TAC will continue to be set for squids in both areas. Stock assessments for squids would continue to be done annually. Directed fishing for squids is allowed, however given the low TAC established annually for both the BSAI and GOA groundfish specifications, NMFS has determined that existing TAC levels are not sufficient to support a directed fishery in either region and thus continues to place squids in both areas on bycatch-only status. Therefore squids are taken only as incidental catch in groundfish fisheries (primarily pollock fisheries) in both regions.

Under Alternative 1, MRAs for squids as an incidental catch species are established at 20%. This allows vessels fishing for groundfish to retain a quantity of squids equal to, but no more than, 20% percent of the round weight or round weight equivalent of groundfish species open to directed fishing that are retained on board the vessel at any time during a fishing trip.

Alternative 2 would move squid in both BSAI and GOA FMPs into the 'Ecosystem Component'. Catch specifications (OFL, ABC, TAC) will no longer be required. Under Alternative 2, regulations would prohibit directed fishing for squid, require recordkeeping and reporting to monitor and report catch of squid species annually, and establish a squid maximum retainable amount (MRA) when directed fishing for groundfish species at a level (2-20%) to discourage retention while allowing flexibility to prosecute groundfish fisheries

The options for lower MRAs are considered to discourage any targeted fishing for squid. The lower range MRA has been used in the forage fish classification with the rationale being to ban targeted fishing of these ecologically important species.

The table below provides a summary of key decision points under Alternatives 1 and 2 with a summary of associated management and enforcement issues following the table.

Summary of Management Measures in Alternative 1 and 2

Management Measure	Alt 1- No Action	Alt 2 - Ecosystem Component
Prohibit a Directed Fishery	No However NMFS has not opened squid to directed fishing	Yes prohibit directed fishing in regulations at 679.20(i)
Retention and sale	Yes Retention and sale allowed.	Yes Some small amount can be retained and sold.
Annual Harvest Specifications	Yes - annual stock assessment - TAC assessed in optimum yield	No - Periodic stock assessment - catch not assessed in optimum yield
Incidental Catch Management	Yes - MRA as incidental catch species = 20%	Yes - MRA as incidental catch species = options for 20%, 10%, 2%
Recordkeeping and Reporting	Yes - require catch reporting	Yes - require catch reporting

Some management and enforcement issues are identified with management under Alternative 1 including:

- Monitoring catch at the individual trip level to ensure that the squid MRA is not exceeded
- Monitoring cumulative catch to ensure that catch is not approaching the ITAC
- Determining if additional TAC is available to be added to the ITAC
- Placing squid on prohibited species status when total TAC is exceeded or projected to be exceeded
- Considering further directed fishery closures when harvest approaches the OFL
- Challenge for enforcement to determine appropriate penalty for squid MRA overages due to low price of squid.
- Marked increase in enforcement actions when BSAI squid were placed on prohibited species status in 2015.

Depending upon the selection of an MRA option under Alternative 2, many of these management and enforcement issues would be alleviated. However, NMFS's enforcement burden is likely to increase should the Council select any MRA lower than the status quo.

The Council previously reviewed this analysis in June 2016 and modified its alternative set and problem statement at that time and requested that this analysis be brought back for another initial review once revised National Standard 1 guidelines were available. Upon review of the changes and the updated analysis the Council may wish to modify its suite of alternatives and align its problem statement with revised National Standard 1 guidelines.