



NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

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Action Memo

File #: HAL 18-003, **Version:** 1

Dan Hull, Chairman
David Witherell, Executive Director

SUBJECT:

Charter Halibut Permit Annual Renewal - Final Action

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ACTION REQUIRED:

- Review Public Review Draft of analysis
- Consider Preferred Alternative & Elements
- Determine whether to take final action

BACKGROUND:

The Council is considering a regulatory amendment to implement an annual renewal process for the Charter Halibut Permit (CHP), a component of the Charter Halibut Limited Access Program. The information collected in an annual registration process would update and/ or expand on the CHP data. This is a Public Review draft which means the Council could identify a preferred alternative and take final action at this meeting.

The Council's preliminary preferred alternative (PPA) includes a requirement for CHP holders to annually renew their CHP(s) through an application to NMFS Restricted Access Management (RAM). In the Council's PPA, the CHP holder would include their CHP number(s), CHP holder name, CHP holder address, and CHP phone number/ and or email address. The Council's PPA would also require an update of the CHP holder's ownership structure.

In October 2017, during the initial consideration of this action, the Council added another option for consideration that would include a question on CHP use and leasing behavior into the annual renewal application. The Council did not adopt this question into its PPA, not necessarily because it was rejecting this option, but because the Council wanted more analysis and feedback before further consideration.

In addition to this question on CHP use, the analysis highlights several other decision points and opportunities for clarification including if/ at what point NMFS RAM would revoke a non-transferable CHP that was not renewed, what information would be *required* in an application process (i.e., CHP would not be issued until completed), as well as any feedback on the discussion of implementation.

The Council describes the intent of the proposed action as providing more complete and useful information to evaluate whether changes to the CHP Program are necessary as a result of changes in ownership and participation of CHPs, to facilitate retirement of non-transferable permits when ownership changes, and improve the ability of enforcement agents to ensure valid permits are being used. The analysis describes the potential benefits of this information compared to the expected burden on industry and agency from this additional reporting requirement.