



New England Fishery Management Council

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MEMORANDUM

DATE: September 17, 2020
TO: Groundfish Committee
FROM: Groundfish Plan Development Team
SUBJECT: **Correspondence Review of the Groundfish Catch Share Review**

On May 6, 2020, the Groundfish Plan Development Team (PDT) held a webinar to review the Final Draft Report of the Groundfish Catch Share Review and forwards several comments for consideration by the Groundfish Committee ahead of the Council decision on the 2021 Council Priorities, scheduled for the October 2020 Council meeting.

The PDT's discussion was framed by several questions prepared by Council staff:

1. Are you aware of any other relevant work not covered by the review (published/available work only, rather than work in progress)?

The PDT discussed some of the biological analyses and the difficulties of attributing biological changes and outcomes to the sector management system. One workgroup member noted that they did not see an assessment of whether or not ACL exceedances changes before and after implementation. Review authors responded that this was complicated by the fact that there wasn't a hard TAC prior to the sector program, which complicates comparison. PDT members suggested that a sentence about benefits of the system, plus any relevant caveats, might be helpful. Furthermore, on tracking biological outcomes, the PDT noted that there was some discussion of some stocks continuing to be experiencing overfishing, despite no ACL exceedances—these changes or lack of changes in stock status are hard to attribute to the catch share system. The authors suggested that perhaps the review could state this more firmly, that these changes cannot be attributed directly to the catch share system with the existing information. Other PDT members noted that while on paper there are no ACL exceedances, the report does document monitoring levels and refers to misreporting and issues with catch accounting.

2. Are there sections/impact areas included in the report that were not of value or alternatively an oversight that should have been included?

The PDT did not comment on whether there were sections in the report that were not of value or if there were sections that were missing.

3. Are there any broader conclusions evident from analyses/conclusions as a whole (such as cross-cutting conclusions across biological, economic, social sections)?

The PDT highlighted the difficulty in drawing cross-cutting conclusions across the various sections in the report, such as whether or not the program is performing well overall, or if conditions (economically, biologically, socially) have improved. Report authors noted that it wasn't explicitly the goal of the report to draw such conclusions and that the report depended on the availability of pre-existing data and information to evaluate the goals and objectives of the program, which are based on the goals and objectives of the FMP and aren't specific to the program itself. Other PDT members felt that while it was not the report's duty to draw overarching conclusions, the goals and objectives could still have been looked at objectively and without attempting to infer causation, metrics could have been assigned, and trends in those metrics might have been compared. For example, Objective 7 is to maintain a diverse groundfish fishery. Defining the 'diversity evenness' metric to measure the change of each attribute would allow for identification of 'improvement' vs 'decline' for gear, vessel, etc.

4. What are some ways the recommendations could be prioritized when thinking about management of the fishery and future Council work?

The PDT did not offer any ways to prioritize recommendations.

5. Do you have any additional recommendations for future reviews?

The PDT discussed how it would be helpful to not only track how many vessels were active, but where inactive vessels/permits went—what did they do instead of groundfishing? What was their historical dependence on groundfish? PDT members discussed how this could be accomplished, but report authors acknowledged it might be challenging since vessels tend to move in and out of the groundfish fishery year to year. Others discussed how other metrics, such as the reliance on the groundfish fishery metric, get at how much different active vessel classes earn in the groundfish fishery compared to other fisheries. Some suggested building on this and looking at those who exited. Other potential ideas included using the crew survey data as well as potentially sector manager interviews concerning their perspective on participation levels. Another suggestion for future reviews was looking at current sector reporting requirements and what could be provided or what would be helpful for this type of review.