Redfish Sector Exemption Review
DRAFT Report

Groundfish Plan Development Team

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New England
Fishery Management Council

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1. Introduction

Overview

In Framework Adjustment 61 (FW61), the Council included a measure to conduct a review of the universal redfish sector exemption that was codified in the Northeast Multispecies (Groundfish) Fishery Management Plan (FMP) and in regulation at 50 CFR 648.85(e)(1)(ix). Specifically, the review aims to assess performance of the exemption program. While FW61 indicated the intent for the review to occur "following the next redfish assessment" the Council first recommended the review as a priority for 2025, and the Groundfish Plan Development Team (PDT) and Groundfish Committee developed the scope of the review. Subsequently, this work was paused when the Council changed priorities mid-year. The Council again recommended the review as a priority for 2026.

This report documents the development of the review metrics, compiles PDT review analyses, and provides relevant background information.

Objective of the Review

Review the universal Redfish Exemption Program for groundfish sector vessels defined at 50 CFR 648.85(e)(1), including (but not limited to) the following:

- Evaluation of the monthly and annual thresholds performance
- Vessel-level performance
- Bycatch of other groundfish stocks
- Any observed changes in selectivity
- Purpose, goals, and objectives of the program

Goals and Objectives of the Redfish Sector Exemption

The Council specified the purpose and goal, and objectives of the redfish sector exemption in FW61 as follows:

Purpose and goal: The purpose of establishing a universal sector exemption for redfish, rather than an annual exemption, is to increase stability and certainty for current and potential participants and improve Council control and oversight of the fishery. The goal of the redfish universal sector exemption is to achieve optimum yield of the redfish resource.

Objectives: The objectives of the redfish universal sector exemption include:

1. Allow use of an efficient mesh size codend to facilitate harvest of redfish.
2. Increase the harvest of redfish while reducing to the extent practicable bycatch of other groundfish stocks.
3. Restore flexibility lost with 2020 contraction of the redfish exemption area.
4. Remove areas from the exemption which provide little opportunity to effectively target

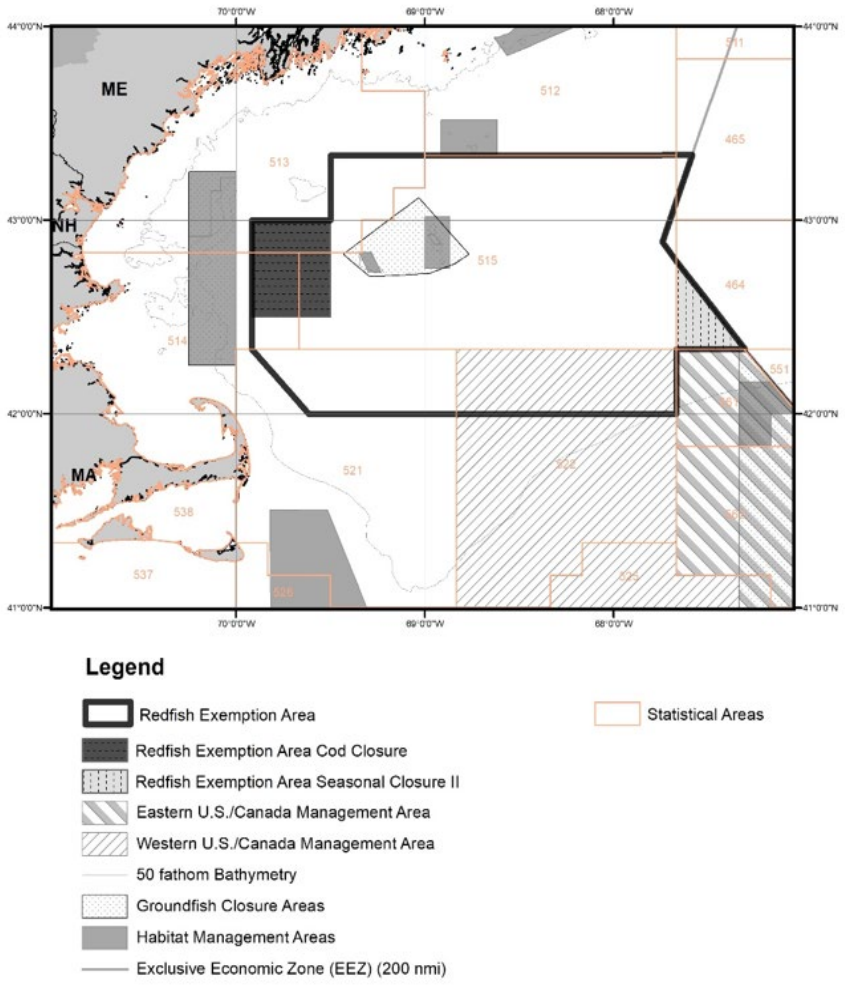
redfish, or little ability to achieve exemption performance thresholds.

Description of the Redfish Exemption Program for Sector Vessels

Commercial vessels operating within the sector program are universally exempted from the minimum codend mesh size restrictions for trawl gear specified in § 648.80(a)(3)(i) or (a)(4)(i) when fishing in compliance with the provisions of the Redfish Exemption Program (defined at § 648.85(e)(1)). Vessels may only use trawl gear (including otter trawl, haddock separator trawl, flounder trawl, or Ruhle trawl) when declared into and fishing in the Redfish Exemption Program, and may use a minimum codend mesh size of 5.5-inch square or diamond mesh within the Redfish Exemption Area (Map 1).

The Redfish Exemption Area includes a seasonal cod closure area, closed from February 1 through March 31(Cod Closure) each year due to potential catch of GOM cod. It also includes an additional seasonal closure area (Seasonal Closure II) which is closed from September 1 through December 31 each year to reduce bycatch of other groundfish stocks, mainly pollock (see Map 1).

Map 1- Universal Redfish Sector Exemption



Prior to the establishment of the universal redfish sector exemption through FW61, there were several previous iterations of the exemption under the annual sector exemption request process. These were considered in the development of Framework 61 and contributed to the development of the current Redfish Exemption Program. For descriptions of and information on previous versions of the redfish sector exemption, see Additional Information.

Vessels participating in the exemption are subject to the following program requirements.

Vessel Requirements:

1) To participate in the Redfish Exemption Program on a sector trip, an eligible vessel must declare its intent to do so through the Vessel Monitoring System (VMS) prior to leaving the dock, in accordance with instructions provided by the Regional Administrator. Vessels that fail to declare into the Redfish Exemption Program may not fish under the Redfish Exemption Program.

2) Gear with codends with mesh smaller than otherwise permitted by regulation must be stowed during transit to and from the Redfish Exemption Area, and when not in use under the Redfish Exemption Program. Any non-trawl fishing gear must be stowed for the duration of any trip for which a vessel declared its intent to fish under the Redfish Exemption Program.

3) The owner or operator of a vessel that has declared into the Redfish Exemption Program must submit catch reports via VMS, for each day of the fishing trip. The reports must include at least the following information:

- eVTR number
- Date fish were caught and statistical area in which fish were caught; and
- Total pounds of each regulated Northeast multispecies and ocean pout kept (in pounds, live weight) as well as the total pounds of other kept catch (in pounds, live weight) in each statistical area

4) After the vessel has entered the Redfish Exemption Area, the owner or operator of a vessel must submit a redfish exemption fishing notification before switching to a smaller mesh codend allowed under the Redfish Exemption Program. This notification is provided with an additional catch report submitted via VMS, reporting all catch on board and indicating that the vessel is switching to a smaller mesh codend. This notification indicates that the vessel is now fishing under the provisions of the Redfish Exemption Program. The notification must include at least the following information:

- eVTR number
- Date fish were caught and statistical area in which fish were caught; and
- Total pounds of each regulated Northeast multispecies and ocean pout kept (in pounds, live weight) as well as the total pounds of other kept catch (in pounds, live weight) in each statistical area
- Indication that the vessel is now switching to a smaller mesh codend

5) A vessel that has declared its intent to fish under the Redfish Exemption Program may conduct the first part of its trip outside the provisions of the Redfish Exemption Program, subject to all other Northeast multispecies regulations including codend mesh size, prior to sending a redfish exemption fishing notification.

6) Once a vessel has sent a redfish exemption fishing notification, vessel operators are allowed (but not required) to switch to 5.5-inch (or larger) codends within the Redfish Exemption Area. Fishing outside of the Redfish Exemption Area first is optional, but once a vessel has sent a redfish exemption fishing notification, the vessel cannot fish outside the Redfish Exemption Area.

7) Vessel operators submit the standard requirement of a separate Vessel Trip Report to report catch for each codend mesh size for each statistical area where it is fished.

The program also includes performance standards (described below) for sectors participating in the program which are monitored for compliance.

Sector Performance Standards:

Sectors with vessels participating in the Redfish Exemption Program, must comply with monthly and annual redfish landings thresholds and monthly groundfish discards thresholds.These thresholds are intended to provide defined performance standards, accountability, and transparency to achieve the goals and objectives of the Redfish Exemption Program.

Monthly Redfish Landings Threshold - Monthly redfish landings by a sector may not be less than 50 % of all the allocated Northeast multispecies stocks landed each month while their member vessels fished under the provisions of the Redfish Exemption Program.

Monthly Groundfish Bycatch Threshold - Monthly observed discards of regulated Northeast multispecies and ocean pout by a sector whose member vessels fish under the provisions of the Redfish Exemption Program may not exceed 5 percent of total observed kept catch, for those portions of trips fished each month under the provisions of the Redfish Exemption Program.

Annual Redfish Landings Threshold - Annual fishing year redfish landings by a sector whose member vessels fish under the provisions of the Redfish Exemption Program may be no less than 55 percent of all the allocated Northeast multispecies stocks landed while fishing under the provisions of the Redfish Exemption Program.

A sector may not fail to meet either monthly threshold for (a) four or more months per fishing year, or (b) three consecutive months. If either limit is breached, the sector will have its use of the redfish exemption program revoked for the remainder of that fishing year (year 1). Additionally, the sector will be placed on a probationary status for the following fishing year (year 2). In the fishing year when a sector is on probationary status, if the sector again fails to meet either monthly threshold for (a) four or more months of a fishing year or (b) three consecutive months in a fishing year, the sector will have its use of the redfish exemption program revoked for the remainder of that fishing year (year 2) and have its use of the exemption

revoked for the following fishing year (year 3), with its use of the exemption reinstated in year 4. Otherwise, the sector's probationary period would expire at the end of the probationary year (year 2).

Similarly, if a sector fails to meet the annual threshold (in year 1), it would be placed on probationary status for the following fishing year (year 2) as soon as the data is available. In the following probationary fishing year (year 2), if the sector again fails to meet this annual threshold, the sector will have its redfish exemption revoked for the following fishing year (year 3). But if in the following probationary fishing year (year 2) the sector meets the annual threshold, the sector's probationary period would expire at the end of the following year (year 2).

2. Methods and Data

Review Metrics

The Groundfish PDT developed a suite of review metrics to address the objectives of the exemption review, with input from the Groundfish Advisory Panel and Groundfish Committee. Review metrics are organized into themes. The PDT categorized a subset of metrics as Tier 1 and a subset as Tier 2, with Tier 1 metrics being the primary metrics critical to the review and Tier 2 as secondary metrics to be included pending resource and data availability.

The PDT was able to address all Tier 1 metrics, and most of the Tier 2 metrics, with the exception of examining catch composition metrics for 4.5" mesh that was previously allowed for use under Exempted Fishing Permits (EFPs). These EFPs were limited in scope and low sample sizes prevented any further analysis. Further, these trips using 4.5" mesh to target redfish were in conjunction with monitoring programs, mostly the Maximized Retention Electronic Monitoring (MREM) program, which would have made drawing conclusions difficult. The PDT refers to earlier research studies testing the use of 4.5" mesh to target redfish for more information (see Additional Information).

Tier 1 Metrics

Fishery Performance

- **Sector compliance with thresholds**
- **Trends in fleet participation in the program**
- **Economic information: revenue**

Catch Composition

- **Total catch/landings/discards by species**
- **Ratio of redfish versus other groundfish (landings and discards)**
- **Size (length frequencies)**

Program Goals and Objectives

- **Seasonal performance of the program**
- **Sector compliance with thresholds** (also addressed above under *Fishery Performance*)
- **Vessel-level/Operator-level performance**

Tier 2 Metrics

Fishery Performance

- **Monitoring coverage levels**
- **Enforcement information**
- **Economic information: costs**

Catch Composition

- **Expand to 4.5" mesh used under past Exempted Fishing Permits (EFPs)**

Program Goals and Objectives

- **Redfish biology: growth and maturity information**

Sector Manager Feedback

As part of the development of review analyses, the PDT sought feedback from sector managers on preliminary analyses for select metrics. On March 2, 2026, the PDT sub-group presented preliminary analyses at a monthly sector manager call covering the following review metrics: trends in fleet participation, catch composition, and revenue information, and shared feedback questions for managers to help with refining the analyses and informing presentation of analyses and results.

Sector managers highlighted that the outcomes and data included in this report are as important to inform industry as they are to management, and had suggestions for the analyses presented and the contents of this report:

- Managers asked a number of questions about the criteria for classifying trips as Redfish Exemption Program trips, which led to the development of the "Redfish Trip Criteria" section of this report.
- Managers suggested that the PDT evaluate operator-level performance in the Redfish Exemption Program, in addition to vessel-level performance.
- Managers were interested in the size distribution of redfish landings in the program. They wondered what percent of landings were under reproductive size.

Managers also gave suggestions for the Council to consider if they choose to revise the Redfish Exemption Program:

- Managers noted that during the development of the Redfish Exemption Program there was a discussion around increasing the performance standards as time went on, and managers thought the program thresholds could be re-evaluated as a part of this review.
- Managers expressed an interest in building in more flexibility to the program so that vessels can fish in and out of the redfish exemption program on the same trip. Currently, vessels are allowed to fish outside of the Redfish Exemption Area prior to participating in

the Redfish Exemption Program. However, once they have fished in the Redfish Exemption Program, they may not fish outside the Redfish Exemption Area again for the remainder of the trip. Managers expressed that it would provide operational flexibility to vessels to be able to fish outside of the Redfish Exemption Area after conducting the Redfish Exemption Program portion of their trip.

Redfish Trip Criteria

There are challenges with monitoring the program for compliance with exemption requirements given data availability and temporal uncertainty, where unless the trip is observed, *there is no timestamp or chronological order for the subtrip*. This makes it impossible to chronologically link catch reports to specific fishing activity on an unobserved trip. Additionally, the Trip Start Hail (TSH) indicates intent only; it does not confirm that redfish fishing actually occurred during that trip.

Redfish subtrips are identified using a combination of **Stat Area, Gear + Mesh Size, Trip Start Hails (TSH), and Catch Reports**. These criteria are described below. Identification on observed trips is more precise than unobserved trips because of the timestamp associated with the haul.

Unobserved Trip Criteria (landings only)

To participate in the Redfish Exemption Program on a sector trip, an eligible vessel must declare its intent to do so through the VMS prior to leaving the dock (§ 648.85(e)(1)(iv)). Additionally, after the vessel has entered the Redfish Exemption Area, the owner or operator of a vessel must submit a redfish exemption fishing notification and catch report before switching to a smaller mesh codend allowed under the Redfish Exemption Program. This notification indicates that the vessel is fishing under the provisions of the Redfish Exemption Program (§ 648.85(e)(1)(v)(B)). A vessel that has declared its intent to fish under the Redfish Exemption Program (TSH) may conduct the first part of its trip outside the provisions of the Redfish Exemption Program prior to sending a redfish exemption fishing notification (§ 648.85(e)(1)(vi)(A)). Vessels that fail to declare into the Redfish Exemption Program may not fish under the Redfish Exemption Program even if this notification is sent.

Vessels may only use trawl gear when declared into and fishing in the Redfish Exemption Program. Vessels may fish in the Redfish Exemption Program with any trawl gear, including, but not limited to, otter trawl, haddock separator trawl, flounder trawl, or Ruhle trawl (50 CFR 648.85(e)(1)(vii)). In addition, the minimum codend mesh size for vessels fishing in the Redfish Exemption Program is 5.5-inch square or diamond mesh (50 CFR 648.85(e)(1)(vii)(A)), but this does not prevent the vessel from using mesh sizes larger than 5.5 inch mesh. The minimum mesh size for any trawl net used by a vessel on a sector trip in the GB Regulated Mesh Area is 6-inch (15.2-cm) diamond mesh or 6.5-inch (16.5-cm) square mesh applied throughout the body and extension of the net, or any combination thereof, and 6.5-inch (16.5-cm) diamond mesh or square mesh applied to the codend of the net (50 CFR 648.80(a)(4)(i)).

Considering the above, for unobserved trips, NMFS uses the following criteria for unobserved trips, to identify a trip by a sector vessel as a Redfish Exemption Program trip.

1. **The 5.5" Rule:** If the trip has a vtr_mesh of exactly **5.5 inches** and the reported statistical area intersects with the Redfish Exemption Area, it is automatically included, even if there is no TSH or catch report. This is because the regulations at §50 CFR 648.85(e)(1)(vii)(A) allow a minimum codend mesh size of 5.5-inch square or diamond mesh for vessels fishing in the Redfish Exemption Program.

2. **MREM Exclusion:** Even if the gear and area are perfectly aligned with redfish trips, the permit under EFP is blocked for specific dates in 2023 due to their separate research status.

3. **If the trip has a TSH or VMS catch report, we check that one of the following are true in a given subtrip:**
   a. **Gulf of Maine (GOM)**

      For vessels that fished in any of the following Statistical Areas: 464, 465, 513, 514, 515, and used any of the following Gear Types: Bottom Trawls, Beam Trawls, Separator, and Ruhle Trawls (050, 053, 054, 057, 150), trips that use a mesh size of less than 6.5 inches are counted as Redfish Exemption Program trips.

      Vessels may only use trawl gear when declared into and fishing in the Redfish Exemption Program. Vessels may fish in the Redfish Exemption Program with any trawl gear, including, but not limited to, otter trawl, haddock separator trawl, flounder trawl, or Ruhle trawl (§ 648.85(e)(1)(vii)). In addition, the minimum codend mesh size for vessels fishing in the Redfish Exemption Program is 5.5-inch square or diamond mesh (§ 648.85(e)(1)(vii)(A)), but this does not prevent the vessel from using mesh sizes larger than 5.5 inch mesh

   b. **Georges Bank (GB)**

      All sector vessels are exempt from the minimum codend mesh size restrictions for trawl gear specified when using a haddock separator trawl or the Ruhle trawl within the GB RMA, provided sector vessels use a codend with 6-inch (15.2-cm) minimum mesh (§ 648.87(c)(2)(ii)(D)). Therefore, different mesh size criteria are used for trips in GB statistical areas, based on the type of net used. For vessels that fished in Statistical Areas: 521 or 522 trips are counted as Redfish Exemption Program trips, based on the criteria in Table 1.

Table 1- Criteria for counting trips in Georges Bank as Redfish Exemption Program trips.

Gear Category	Equipment Codes	Counted if Mesh is...
Non-Selective Gear	050, 053, 150 (Standard Trawls)	< 6.5"
Selective Gear	054, 057 (Separator/Ruhle)	< 6.0"
Electronic Monitoring	Any of the above (if EM = 'MREM')	< 5.1"

Observed Trip Criteria

Because data from observer logs include a timestamp for observed hauls, these timestamps are used to evaluate hauls relative to the time of the VMS catch report to determine if they are occurring under the Redfish Exemption Program. All subtrips after the VMS catch report are counted toward the exemption, as the regulations state that this report is what indicates the vessel is fishing under the provisions of the Redfish Exemption Program (§50 CFR 648.85(e)(1)(v)(B)).

Discard Monitoring

Compliance with the groundfish discard thresholds for exemption trips is monitored via observed discards only, not calculated discards. Meanwhile, discard estimates are calculated in CAMS from the current discard strata for redfish exemption trips which is based on the Trip Start Hail requirement. Because the Trip Start Hail indicates intent to use the exemption only, there are a substantially greater number of trips with a Trip Start Hail that ultimately did not use the exemption compared to “true” redfish exemption trips in a given year (Table 2). These differences have implications for discard estimation. Additionally, there are a small number of exemption trips each year that did not complete the Trip Start Hail requirement. In most of these cases, the redfish exemption notification and multispecies catch report was submitted.

Table 2- Number of redfish exemption trips, trips without a Trip Start Hail (TSH) and trips that completed a TSH but did not use the exemption, FY2021 - 2025.

Fishing Year	Trips	No TSH	TSH not redfish
2021	70	11	399
2022	92	7	332
2023	90	13	355
2024	114	20	321
2025	62	13	258

Note: Data from fishing year 2021 begin July 28, 2021
Fishing year 2025 data queried February 2026

Data for Review Metrics and Analyses

The review metrics and analyses use the above described Redfish Trip Criteria to identify redfish exemption trips, unless where noted otherwise. Reported data are for fishing years (FY) 2021-2025 (the years under the universal sector exemption). Note that FY2021 and FY2025 are partial years.

3. PDT Analyses and Results

Sector Compliance with Catch Thresholds

NOAA Fisheries Sustainable Fisheries Division monitors sectors performance in the Redfish Exemption Program in accordance with the program's monthly and annual landings and thresholds. A process for notifying sectors of performance against Redfish Exemption Program catch and discard thresholds was developed during fishing year 2021, and the first full year of monitoring sector performance against these thresholds occurred in 2022. Starting in 2022, NMFS developed a process for sending sectors an annual letter documenting the sector's performance in the Redfish Exemption Program. Starting in 2024, NOAA Fisheries developed a monthly report, showing all Redfish Exemption Program trips taken by a sector's vessels and sector performance to date against the monthly and annual thresholds. These reports have been sent to sector managers with vessels participating in the program on a monthly basis since December 2024.

Since 2021, most sectors have met the monthly and annual threshold requirements year-to-year. Because the Redfish Exemption Program was implemented partway into the 2021 fishing year, no action was taken at the conclusion of FY 2021 to put any sectors on probation, regardless of whether they met the performance thresholds. Throughout the history of the program, there has only been one instance of a sector being put on probation and no sector has been prevented from participating in the program in any year. However, due to a transition in NOAA Fisheries sector program staff, performance tracking and communication with managers was inconsistent

throughout the 2023 fishing year. Therefore, no letters were sent to sectors at the end of the year and no sectors were put on probation following the 2023 fishing year, despite some sectors meeting the criteria for probationary status.

Fleet Participation

The following tables provide information on fleet participation in the universal redfish sector exemption, including the number of participating sectors and permits, redfish exemption trips taken, and participating vessels by size class each year.

Given the nuances of the exemption program structure described in the above sections, the PDT examined other aspects of the redfish exemption, including a comparison of the number of "pure" exemption trips in which all sub-trips are considered as fishing under the exemption, and the number of "split" trips which utilize the provision to fish Part 1 of a trip outside the exemption and Part 2 under the exemption (see Description of the Redfish Exemption Program for Sector Vessels above).

Participation in the exemption has been generally stable over time in terms of relative effort, though there have been fluctuations (Table 3). The number of participating sectors increased from FY2021 to a high of six in FY2023, before declining to three in FY2024 and FY2025. The number of permits taking redfish exemption trips followed a similar trend, with a high of 19 in FY2023 declining to 13 in FY2025. The number of redfish trips increased from FY2021 to FY2022 and was highest in FY2024 at 114 trips. The number of days fished followed a similar trend. Notably, days fished per trip is highest in FY2025, indicating longer trips taken compared to previous years.

The majority of vessels participating in the exemption are >75 ft (Table 4). There are fewer than three vessels <50 ft. in length participating in the exemption each year.

The majority of redfish exemption trips are "split trips" in which Part 1 of the trip is fished outside the exemption and Part 2 fished under the redfish exemption (Table 5). Vessels taking "pure" exemption trips, in which all sub-trips are considered to be fishing under the exemption, are almost exclusively >75 ft. in length (Table 6).

Table 3- Number of participating sectors, permits, number of trips, days fished, and average days fished per trip, FY2021 - 2025.

Fishing Year	Sectors	Permits	Trips	Days Fished	DF Per Trip
2021	4	11	70	80	1.1
2022	5	19	92	125	1.4
2023	6	19	90	129	1.4
2024	3	17	114	176	1.5
2025	3	15	62	157	2.5

Note: Days fished is the total number of days gear is fished during a trip, in days. Does not include steam time.
Data from fishing year 2021 begin July 28, 2021
Fishing year 2025 data queried February 2026

Table 4- Number of active vessels by vessel length class and subtrip type taken, FY2021 – 2025.

Fishing Year	SubTrip Type	50-75 ft.	>75 ft.
2021	Redfish Exemption	4	7
2021	All Sector Groundfish	41	30
2022	Redfish Exemption	6	12
2022	All Sector Groundfish	39	31
2023	Redfish Exemption	3	15
2023	All Sector Groundfish	32	32
2024	Redfish Exemption	4	13
2024	All Sector Groundfish	37	33
2025	Redfish Exemption	C*	11
2025	All Sector Groundfish	40	27

Note: Fishing Year 2021 includes activity following the implementation of the universal redfish exemption on July 28, 2021.
Fishing Year 2025 in-season data queried during February 2026.
Among vessels less than 50 ft. in length, there were fewer than three vessels taking a redfish exemption trip in each fishing year.
C* indicates data not presented to protect confidentiality.

Table 5- Number of exemption trips by trip category, FY2021 - 2025.

Fishing Year	Trip Category	Trip Count
2021	Pure Redfish	15
2021	Split Trip	86
2022	Pure Redfish	31
2022	Split Trip	60
2023	Pure Redfish	14
2023	Split Trip	76
2024	Pure Redfish	13
2024	Split Trip	101
2025	Pure Redfish	16
2025	Split Trip	43
Total	Pure Redfish	89
Total	Split Trip	368

Note: Data from fishing year 2021 begin July 28, 2021
Fishing year 2025 data queried February 2026

Table 6- Number of active vessels by vessel length class and subtrip type taken, FY2021 - 2025.

Fishing Year	SubTrip Type	>75 ft.
2021	Pure Exemption Trips	4
2021	Split Exemption Trips	7
2022	Pure Exemption Trips	6
2022	Split Exemption Trips	12
2023	Pure Exemption Trips	3
2023	Split Exemption Trips	15
2024	Pure Exemption Trips	5
2024	Split Exemption Trips	13
2025	Pure Exemption Trips	5
2025	Split Exemption Trips	11

Note: Fishing Year 2021 includes activity following the implementation of the universal redfish exemption on July 28, 2021.
Fishing Year 2025 in-season data queried during February 2026.
Among vessels less than 75 ft. in length, there were fewer than three vessels taking a pure redfish exemption trip in each fishing year.

Catch Composition

The following tables display information on catch composition of redfish exemption sub-trips for landings and discards. Data are displayed at the trimester level due to confidentiality. Table 7 includes the percent of groundfish landings that are redfish, as well as landings values for redfish, other groundfish, and non-groundfish. Table 8 includes the percent of total groundfish discards, as well as discard values for redfish, other groundfish, and non-groundfish. Figure 1 and Figure 2 display landings and discards by groundfish species on redfish exemption sub-trips.

Redfish are the highest landed groundfish species on redfish exemption sub-trips across all years (Figure 1). Redfish landings were notably higher in FY2022 and FY2024 compared to other years. Pollock is the second highest landed groundfish species, at roughly 33% of redfish landed values across most years. Haddock is the third highest landed groundfish species. Other groundfish species (white hake, cod, witch flounder, American plaice, winter flounder, and yellowtail flounder) are landed in minimal amounts.

For discards, pollock are the highest discarded groundfish species, followed by redfish across all years (Figure 2). Both pollock and redfish discards were notably highest in FY2024. Other groundfish species discards are minimal. In FY2023, discards of haddock were higher than for redfish. The proportion of discards to landings is low for redfish, pollock, and other groundfish species.

When examined at the trimester level, the proportion of redfish landings to total groundfish landings ranges from a high of 87.7% in Trimester 3 (January – April) of FY2021 to a low of 48.4% in Trimester 2 (September – December) of FY2025. Redfish landings proportions are consistently lowest for Trimester 2 (September – December) while still meeting the 50% threshold (Table 7). Across most years and trimesters, the proportion of groundfish discards is low and well below the 5% bycatch threshold, with the exception of Trimester 3 in FY2021 at 4.3% and Trimester 2 in FY2024 at 5.3% (Table 8).

Table 7- Percent of groundfish landings that are redfish by trimester, FY2021 - 2025. Landings values in metric tons.

Landings

fishing_year	trimester	non_ground	other_ground	redfish	percent_redfish
2021	Trimester1	69.3	101.4	270.8	72.8
2021	Trimester2	135.0	305.8	347.8	53.2
2021	Trimester3	37.9	19.6	109.0	84.8
2022	Trimester1	321.4	368.5	1206.2	76.6
2022	Trimester2	55.5	150.2	168.5	52.9
2022	Trimester3	54.5	206.5	467.9	69.4
2023	Trimester1	59.8	104.8	286.7	73.2
2023	Trimester2	102.7	282.8	318.0	52.9
2023	Trimester3	180.0	275.1	588.0	68.1
2024	Trimester1	270.0	348.4	1216.3	77.7
2024	Trimester2	80.4	204.0	407.8	66.7
2024	Trimester3	84.0	114.3	230.1	66.8
2025	Trimester1	243.3	306.3	441.2	59.0
2025	Trimester2	75.0	196.9	126.0	39.0

Note: Data from fishing year 2021 begin July 28, 2021
Fishing year 2025 trimester 3 data removed for confidentiality

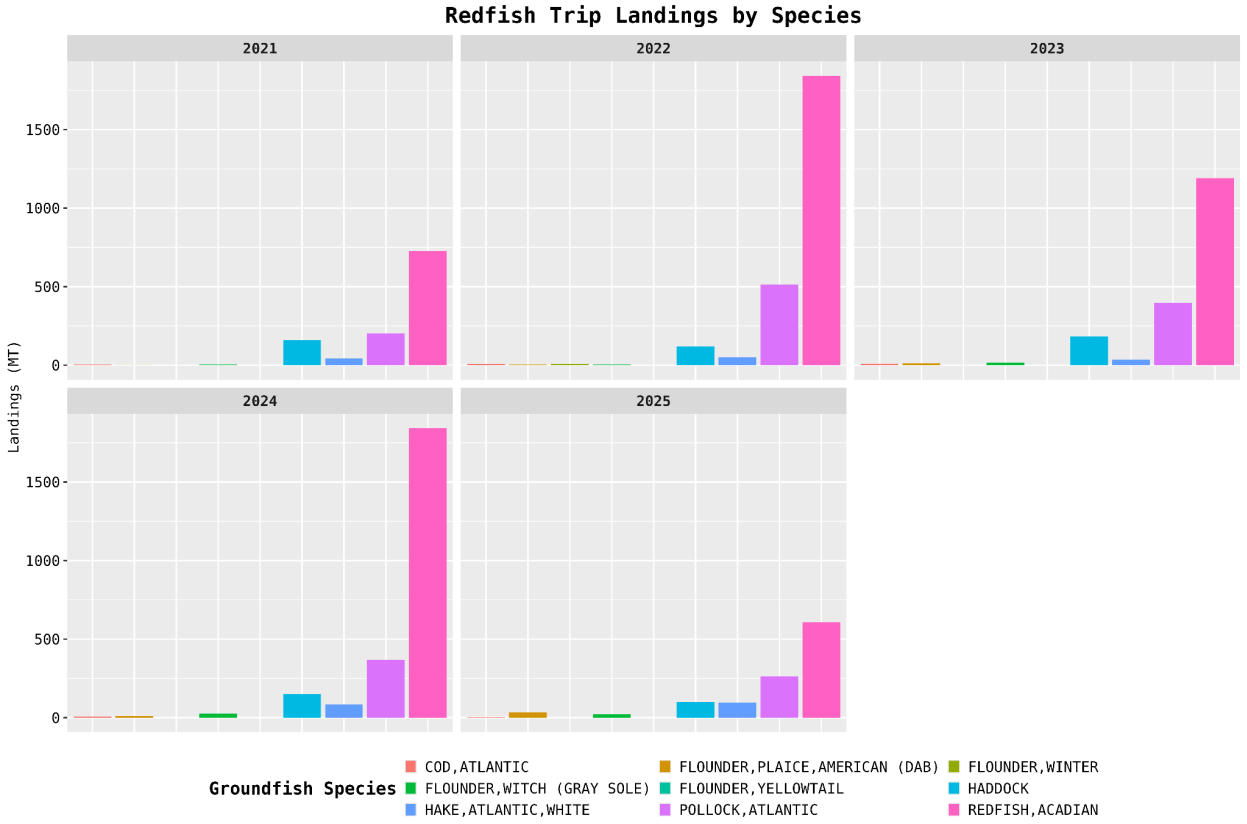
Table 8- Percent of total groundfish discards by trimester, FY2021 – 2025. Values are in mt.

Discards

Fishing Year	Trimester	Non GF	Other GF	Redfish	% GF
2021	Trimester1	6.3	0.0	0.1	0.2
2021	Trimester2	6.8	0.7	0.1	1.2
2021	Trimester3	0.5	0.2	0.0	4.3
2022	Trimester1	42.7	1.7	0.0	0.7
2022	Trimester2	10.2	0.3	0.0	0.4
2022	Trimester3	13.3	3.4	0.0	1.1
2023	Trimester1	30.1	1.1	0.0	0.9
2023	Trimester2	24.3	1.5	0.1	0.9
2023	Trimester3	31.9	3.3	0.2	1.4
2024	Trimester1	66.2	2.1	8.0	2.8
2024	Trimester2	18.9	11.7	0.3	5.6
2024	Trimester3	8.5	0.3	0.1	0.5
2025	Trimester1	111.5	3.1	0.8	1.3
2025	Trimester2	19.4	1.9	0.1	2.6

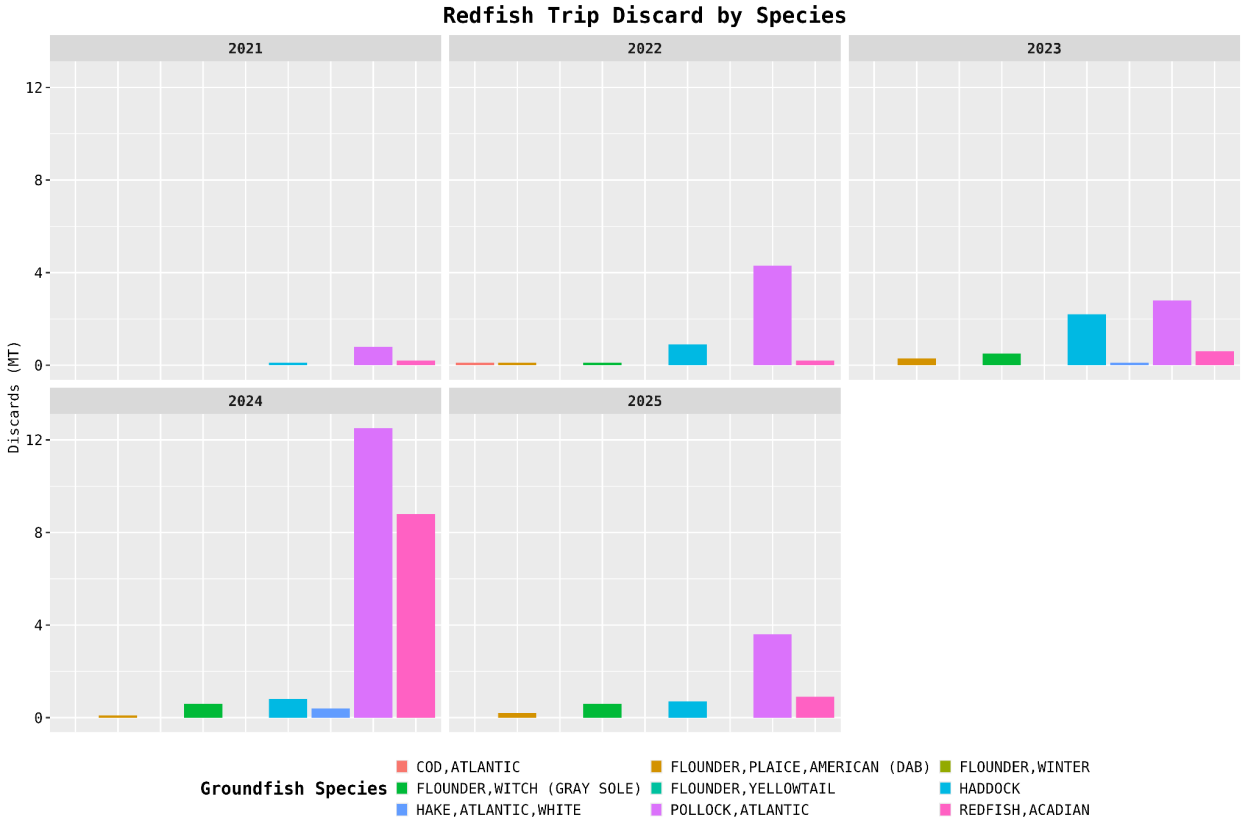
Note: Data from fishing year 2021 begin July 28, 2021
Fishing year 2025 trimester 3 data removed for confidentiality

Figure 1- Redfish exemption trip landings by species, FY2021 - 2025.



Note: Data from fishing year 2021 begin July 28, 2021
Fishing year 2025 data queried February 2026

Figure 2- Redfish exemption trip discards by species, FY2021 - 2025.



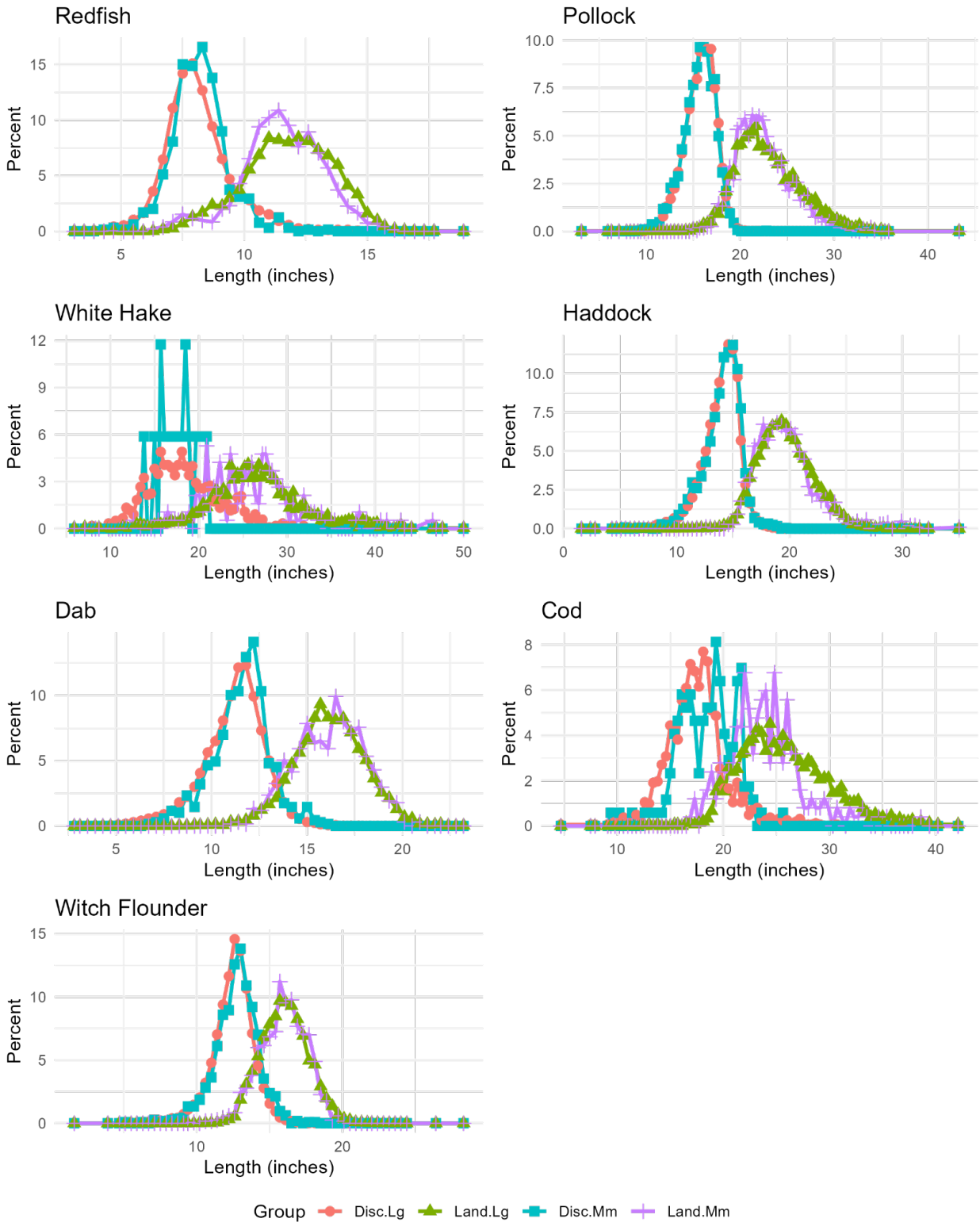
Note: Data from fishing year 2021 begin July 28, 2021
Fishing year 2025 data queried February 2026

Size Composition (Observer Length Frequencies)

The following analyses aimed to determine whether differences in length frequency distribution and cumulative probability exist between medium (defined as 5-5.8 inch) or large (5.8-7 inch) mesh, and between discarded and landed fish using 2021-2025 (CY) ASM + NEFOP observer data. These analyses evaluated whether there was evidence of a possible shift in gear selectivity to smaller fish with medium mesh. Mesh sizes were defined as a range in order to account for error. Lengths were originally collected in cm, but were transformed to inches and rounded to the nearest inch for length frequency plots and to the nearest half inch for cumulative probability plots. The cumulative probability value can be interpreted as the proportion of discards at or smaller than a given length. The cumulative probability analysis was used to estimate the proportion of legal-sized catch that was discarded based on mesh size. The following species were examined in the analysis: redfish, pollock, white hake, haddock, American plaice (dab), cod, and witch flounder. Additionally, due to interest in changes in length frequencies through time, redfish and pollock were also evaluated for differences in the proportion of fish discarded and landed at length from each year 2021-2025 (CY).

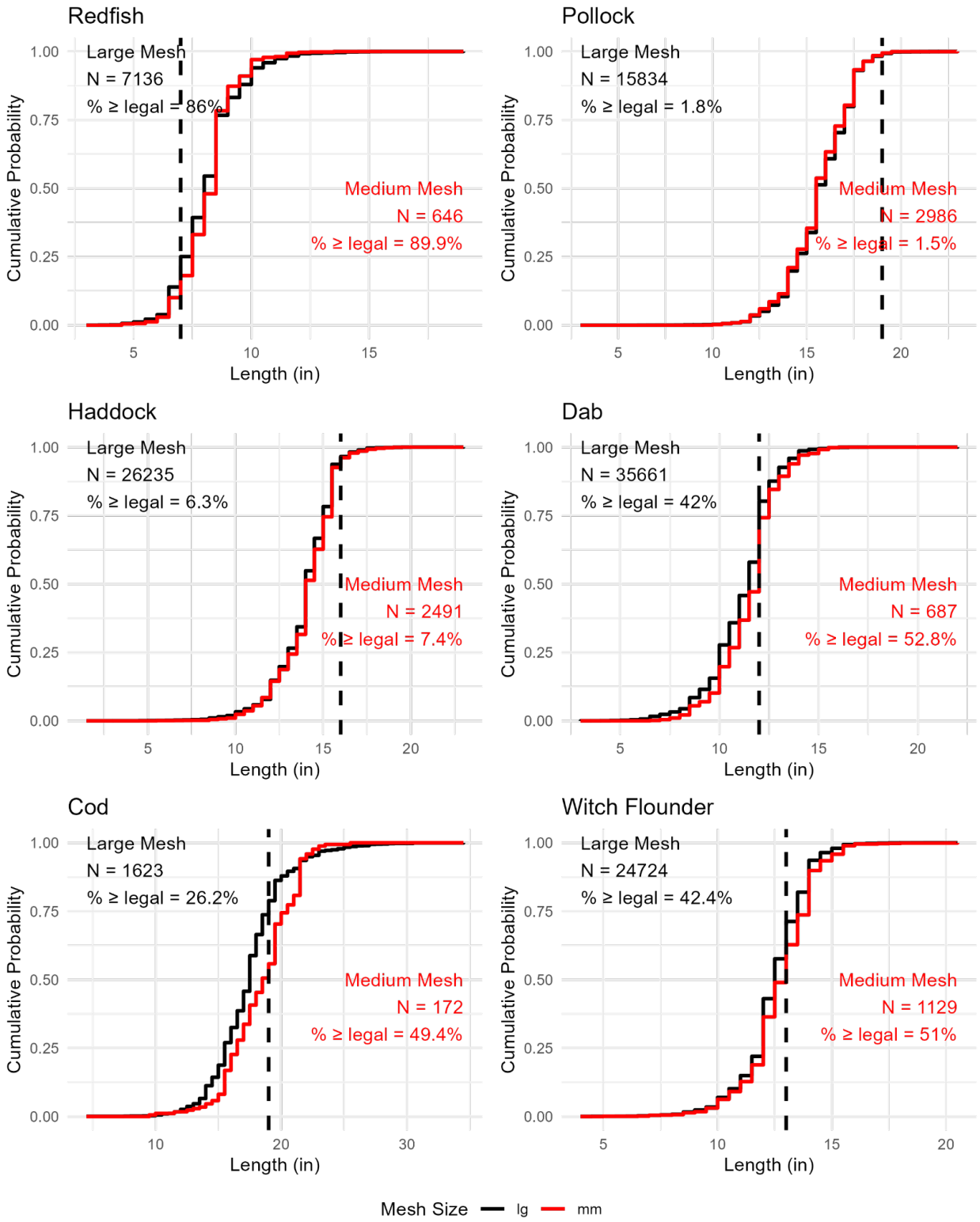
For all groundfish species examined, there were no notable differences in observed length frequencies between the medium mesh (5-5.8”) and large mesh (5.9-7”) for both discarded and landed catch, indicating there is no evidence of any shift in selectivity with the smaller mesh size allowed under the exemption program (Figure 3). A similar analysis was conducted in FW61 (see Previous PDT analyses, which showed greater proportions of large fish discarded with medium mesh for the two flatfish species (American plaice and witch flounder), but in the current analysis, these differences seem to have shrunk or disappeared with additional years of data. Additionally, the same peak length ranges identified in FW61 were also observed in the current analysis, suggesting that the length composition of discarded catch has remained relatively stable between 2015-2019 and 2021-2025. Notably, low sample sizes for cod and white hake make the results of this analysis more uncertain, but length frequencies appear to be over the same general ranges for each mesh size.

Figure 3- Effect of medium (Mm; 5-5.8”) and large (Lg; 5.9-7”) mesh size on landed (Land) and discarded (Disc) length distributions for groundfish caught in the redfish fishery.



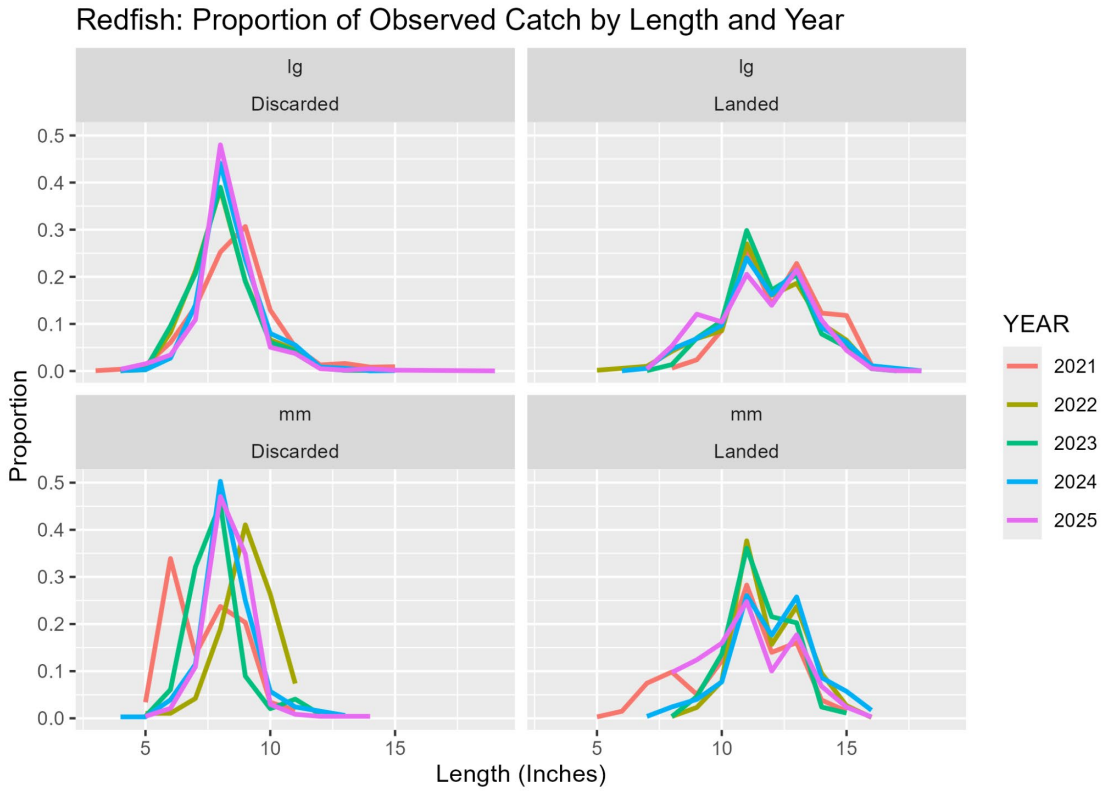
The cumulative probability analysis provided further evidence that selectivity does not appear to vary between medium and large mesh, with catch curves aligning closely for species with robust sample sizes (white hake were not evaluated due to N=17 for medium mesh discards) (Figure 4). For redfish, pollock, and haddock, cumulative probabilities for medium and large mesh were very similar, with differences of less than 5%, followed by dab and which flounder which had differences of less than 11%, and cod which had a difference of almost 25%, although this is thought to be a result of low sample size (N=172 medium mesh). Redfish experienced high discard probabilities of legal sized fish, making up almost 90% of all discards. Conversely, pollock and haddock experienced low discard probabilities of legal-sized individuals, around 2% and 7% respectively. Dab and witch flounder experienced similar, moderate discard probabilities of legal fish, between 42-53%. Due to low sample sizes, the % of legal cod discarded is less certain, although it likely lies between 25-50% based on this analysis. For species with robust sample sizes, these general ranges align with results from the previous FW61 analysis suggesting that there have not been notable changes in discarding legal vs nonlegal fish between the past and current period.

Figure 4- Cumulative Probability of discards at length for medium (mm; black line; 5-5.8”) and large (lg; red line; 5.9-7”) mesh. N denotes the total number of fish in each analysis and the black, dashed, vertical line represents legal size for each species.



For redfish caught in large mesh, the range of sizes of discarded fish appears to become slightly narrower over time, with proportions increasing almost 10% for 8 inch fish between 2022 and 2025 (Figure 5). Lower sample sizes in 2021 and 2022 make medium mesh discard trends more difficult to interpret, but 2023-2025 show the same peak and similar proportions as large mesh. Landed fish had peaks in catch between 11 and 13 inches for both medium and large mesh. For fish landed with large mesh, it appears that in 2025, more fish were landed on the larger end of that range, and was the only year where a greater proportion of 13 inch fish were caught than 11 inch fish. Fish landed using medium mesh generally had similar proportions to large mesh although there was some variation over time with 2022 and 2023 having the highest peaks. Interestingly, 2025 showed some of the lowest peaks, with greater proportions of landings for fish < 10 inches than has been seen in previous years, which was consistent with 2025 large mesh landings as well.

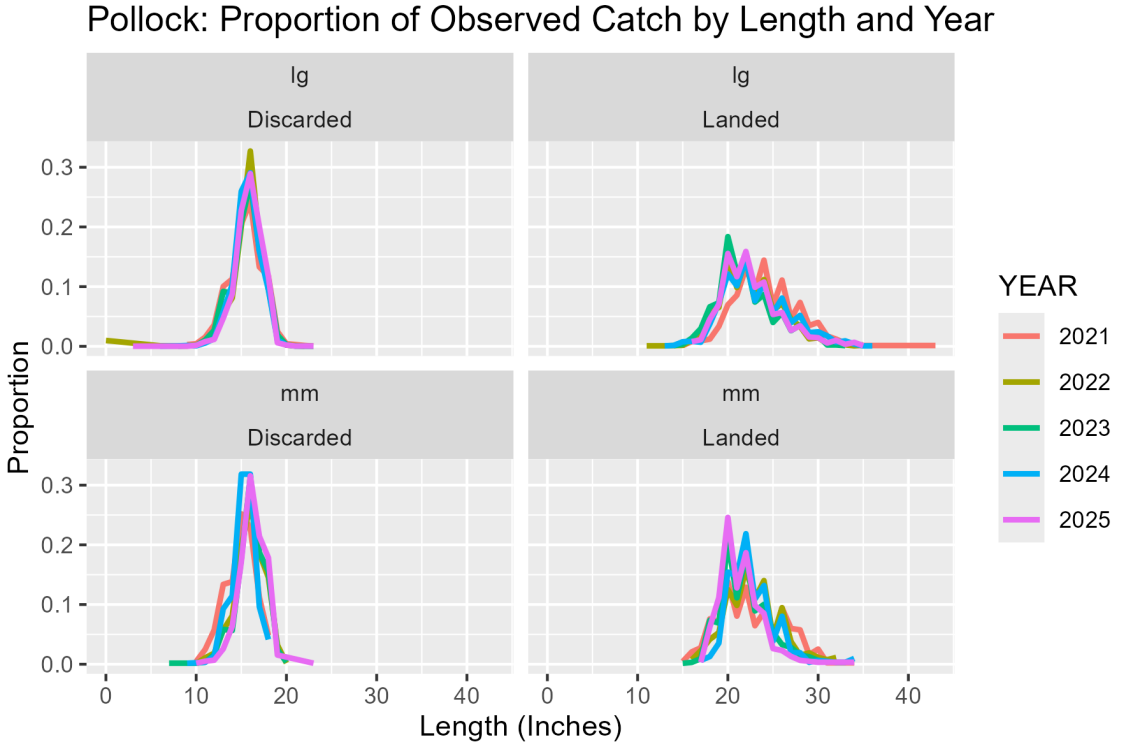
Figure 5- Redfish length proportions in medium (mm; 5-5.8”) and large (lg; 5.9-7”) mesh from CY 2021-2025.



Note: data from 2021 is not directly comparable to the others as the program was implemented partway into the 2021 fishing year.

For pollock, the length proportions for discarded fish caught in both large and medium mesh were consistent over time with the greatest proportion of discards occurring for fish between 15 and 16 inches (Figure 6). For landed pollock, peaks in catch proportions were around 20-22 inches for both mesh sizes, but the total proportion caught at those lengths appears to be slightly higher for medium mesh than large mesh, especially in 2024 and 2025. Pollock landed using large mesh appears to have remained relatively stable over time, but the proportion of fish > 25 inches landed using medium mesh seems to have decreased over time, with minimal catch of larger fish in 2025.

Figure 6- Pollock length proportions in medium (mm; 5-5.8”) and large (lg; 5.9-7”) mesh from CY 2021-2025.



Note: data from 2021 is not directly comparable to the others as the program was implemented partway into the 2021 fishing year.
The sawtooth pattern is likely an artifact of converting from cm to inches and rounding to the nearest whole inch.

Operator Level Performance

The following analyses display distributions of operator level performance relative to the two catch thresholds for the exemption program, proportion of redfish landings and proportion of groundfish discards, as well as observer coverage on redfish exemption trips. For each distinct operator number (as reported on vessel trip report), the redfish landing proportions, groundfish discard proportions, and rates of observer coverage were averaged for the fishing year.

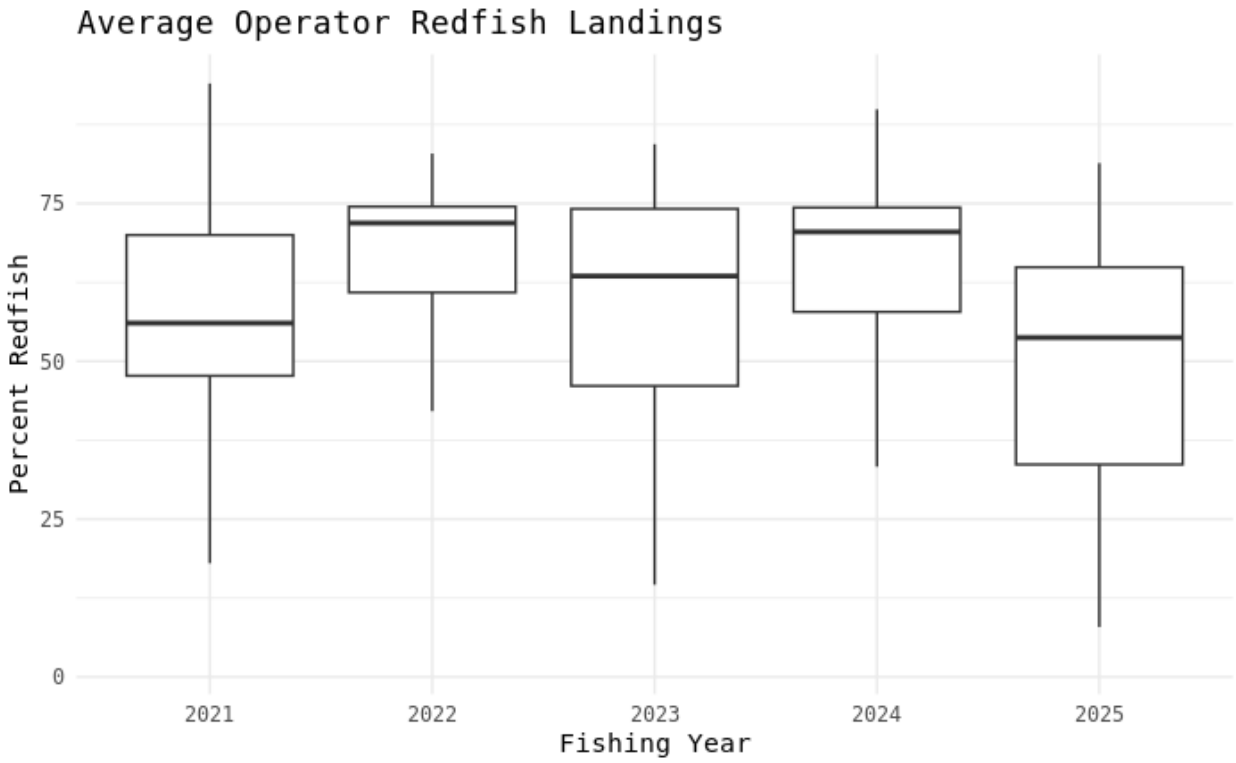
Median percent redfish landings by operator are above the 55% annual threshold for all years (Figure 7). For the three full years under the program, the median percent redfish landings by operator are approximately 70% in FY2022 and FY2024, and approximately 65% in FY2023.

There is greater variability in percent redfish landings by operator in FY2023 compared to in FY2022 and FY2024.

Median percent groundfish discards by operator are well below the 5% threshold for all years, at 1-2% (Figure 8). Variability in percent groundfish discards by operator is greatest in FY2024. This seems consistent with trends seen in other analyses (see Catch Composition), where discards are higher in FY2024 compared to other years.

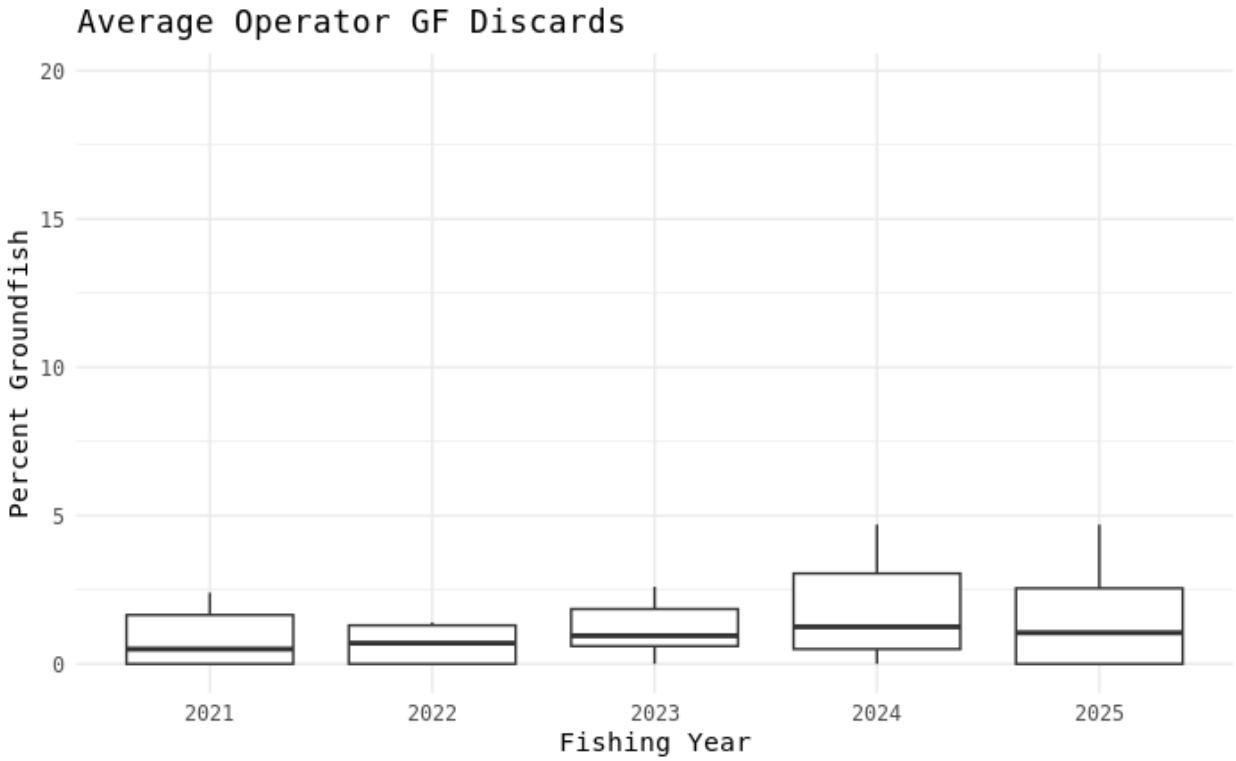
Median percent of observed exemption trips by operator in more recent years is relatively high, at over 80% (Figure 9). There is notable variability in the percent of observed exemption trips by operator across years.

Figure 7- Distribution of annual average redfish landings on exemption trips by vessel operator, FY2021 - 2025.



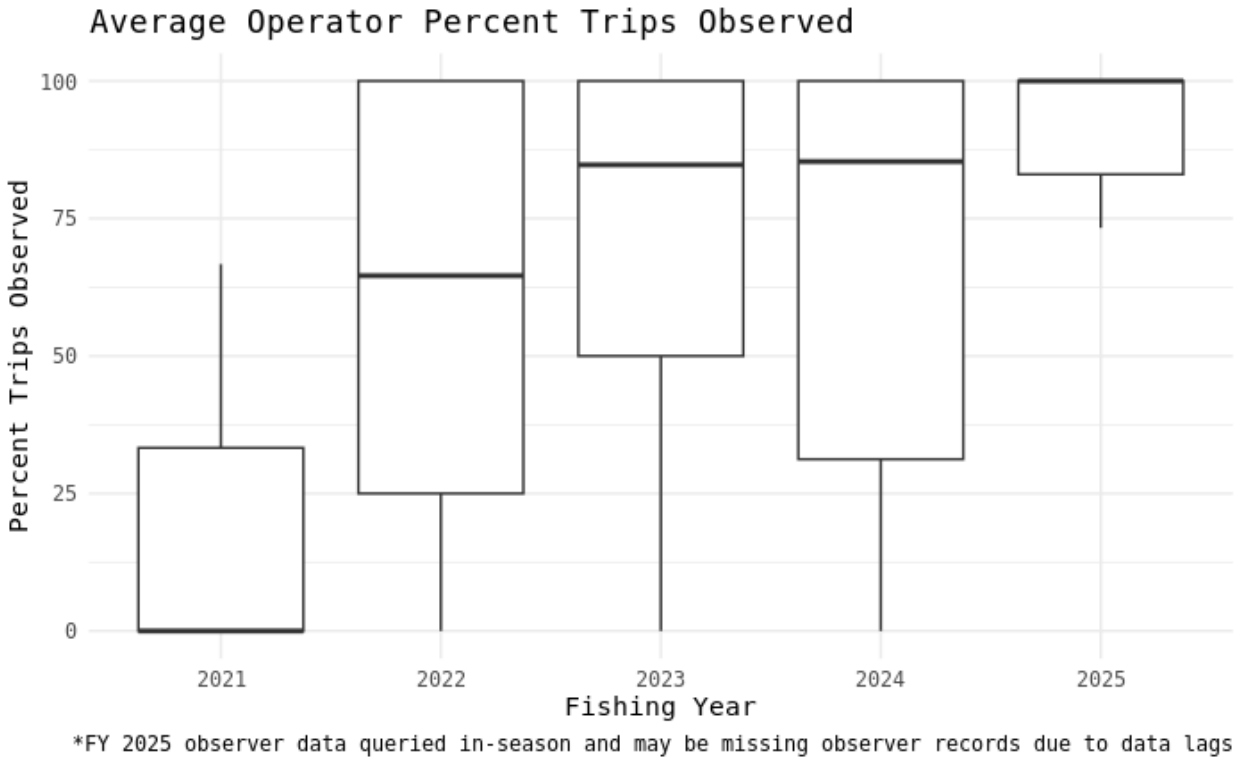
Note: Outlier values removed for confidentiality.
Data from fishing year 2021 begin July 28, 2021
Fishing year 2025 data queried March 2026

Figure 8- Distribution of annual average groundfish discards on exemption trips by vessel operator, FY2021 - 2025.



Note: Outlier values removed for confidentiality.
Data from fishing year 2021 begin July 28, 2021
Fishing year 2025 data queried March 2026

Figure 9- Distribution of annual average percent of redfish exemption trips that were observed by vessel operator.



Note: Outlier values removed for confidentiality.
Data from fishing year 2021 begin July 28, 2021
Fishing year 2025 data queried March 2026

Monitoring Coverage

Table 9 shows the percentage of redfish exemption trips observed by fishing year. For comparison, Table 10 shows the target and realized monitoring coverage levels for the groundfish sector fishery overall. Monitoring coverage on redfish exemption trips has generally tracked total groundfish fishery realized coverage rates, with the exception of FY2024 when monitoring coverage of redfish exemption trips was notably lower, at ~66% observed trips compared to a total realized monitoring coverage rate of 85%.

Table 9- Percent redfish trips observed, FY2021 - 2025.

fishing_year	observed	unobserved	total_trips	percent_observed
2021	17	53	70	24.3
2022	48	44	92	52.2
2023	74	16	90	82.2
2024	75	39	114	65.8
2025	53	9	62	85.5

Note: Data from fishing year 2021 begin July 28, 2021
Fishing year 2025 data queried February 2026

Table 10- Groundfish sector fishery target and realized monitoring coverage levels, FY2021 - 2025.

Fishing Year	Target Coverage Level	Realized Coverage Level
FY 2021	40 %	32 %
FY 2022	80 %	60 %
FY 2023	100 %	81 %
FY 2024	100 %	85 %
FY 2025	100 %	82 %*

*In-season estimate as of March 15, 2026

Landings and Revenue

The following tables and figures provide information on landings and revenue from redfish exemption trips in comparison to all sector trips.

Over all years, 34% of redfish revenue has been generated from exemption sub-trips, from a minimum of 17% in FY2025 and maximum of 50% in FY2022 (Table 11). There is considerable variability at the vessel-level (Figure 10). Redfish comprises 71% of groundfish landings and 52% of groundfish revenue from exemption sub-trips. 8% of Groundfish FMP revenue has been generated from exemption sub-trips, from a minimum of 5% in FY2021 and maximum of 11% in FY2022 (Table 12). The vast majority (~90%) of exemption sub-trip revenue is generated from groundfish FMP stocks.

Table 11- Redfish landed pounds and revenue from redfish exemption trips and all sector trips, FY2021 – 2025.

Fishing Year	SubTrip Type	Redfish Landed lbs. (millions)	Redfish Revenue (millions 2024$)
2021	Redfish Exemption	1.45	0.95
2021	All Sector Groundfish	5.38	3.78
2022	Redfish Exemption	4.06	3.08
2022	All Sector Groundfish	8.36	6.2
2023	Redfish Exemption	2.6	1.89
2023	All Sector Groundfish	8.33	5.8
2024	Redfish Exemption	4.05	2.41
2024	All Sector Groundfish	11.6	6.7
2025	Redfish Exemption	1.3	0.64
2025	All Sector Groundfish	6.84	3.68

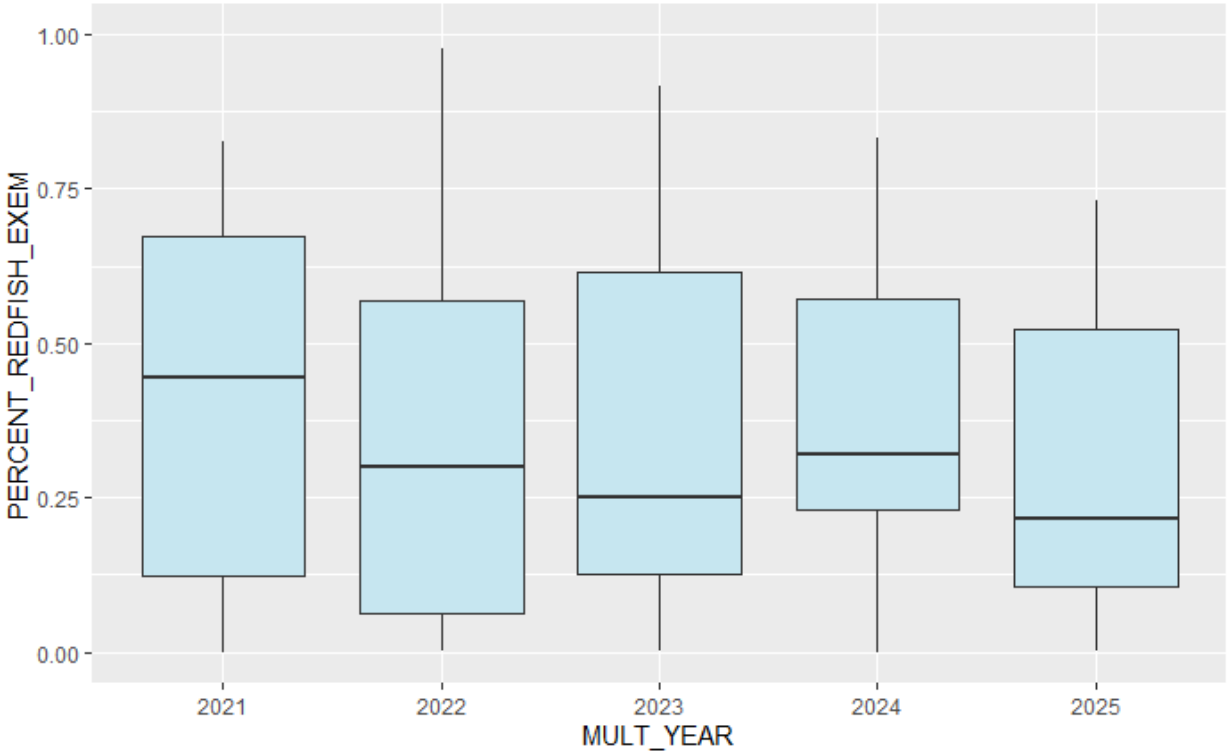
Note: Fishing Year 2021 includes activity following the implementation of the universal redfish exemption on July 28, 2021.
Fishing Year 2025 in-season data queried during March 2026.

Table 12- Groundfish FMP species landed pounds and revenue from redfish exemption trips and all sector trips, FY2021 – 2025.

Fishing Year	SubTrip Type	Groundfish Landed lbs. (millions)	Groundfish Revenue (millions 2024$)
2021	Redfish Exemption	2.19	2.18
2021	All Sector Groundfish	26	42.14
2022	Redfish Exemption	5.43	5.09
2022	All Sector Groundfish	33.1	46.93
2023	Redfish Exemption	3.84	3.69
2023	All Sector Groundfish	32.47	42.48
2024	Redfish Exemption	5.29	4.02
2024	All Sector Groundfish	32.97	40.76
2025	Redfish Exemption	2.28	2.22
2025	All Sector Groundfish	23.5	34.78

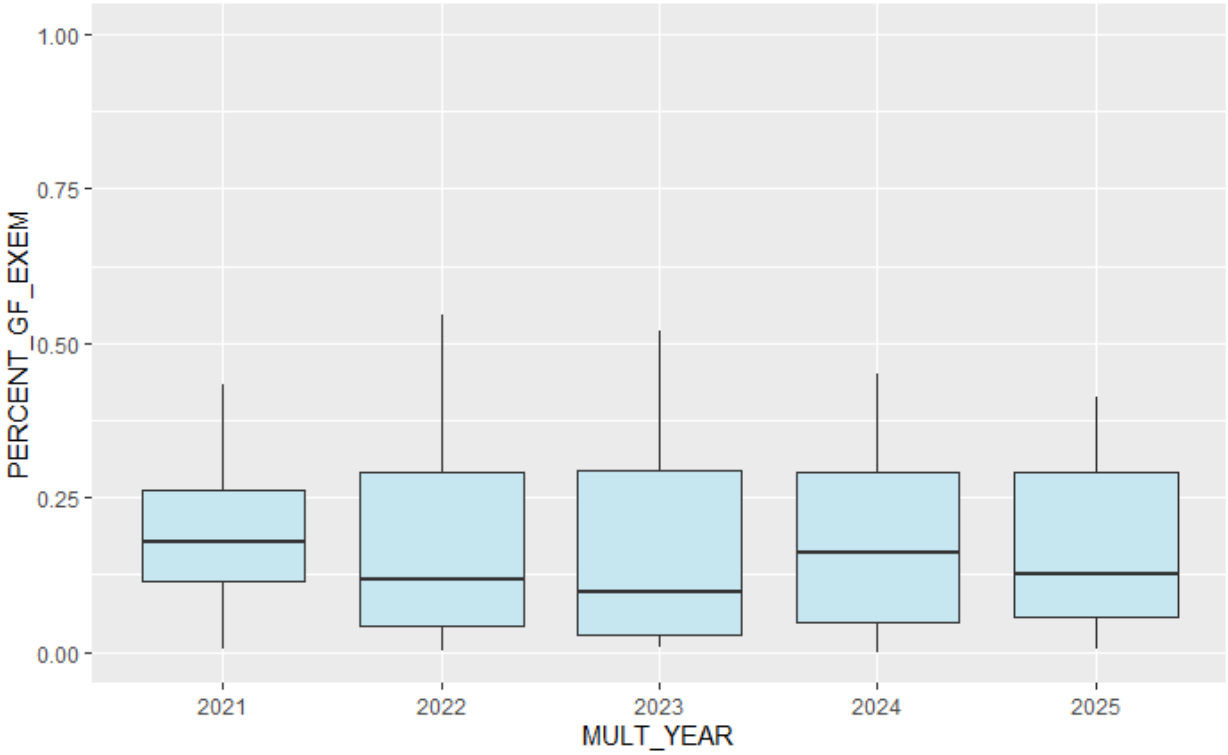
Note: Fishing Year 2021 includes activity following the implementation of the universal redfish exemption on July 28, 2021.
Fishing Year 2025 in-season data queried during March 2026.

Figure 10- Percentage of redfish revenue generated from exemption trips, vessel-level, FY2021 - 2025.



Note: Only vessels with redfish revenue from exemption trips included

Figure 11- Percentage of groundfish FMP revenue generated from exemption trips, vessel-level, FY2021 - 2025.



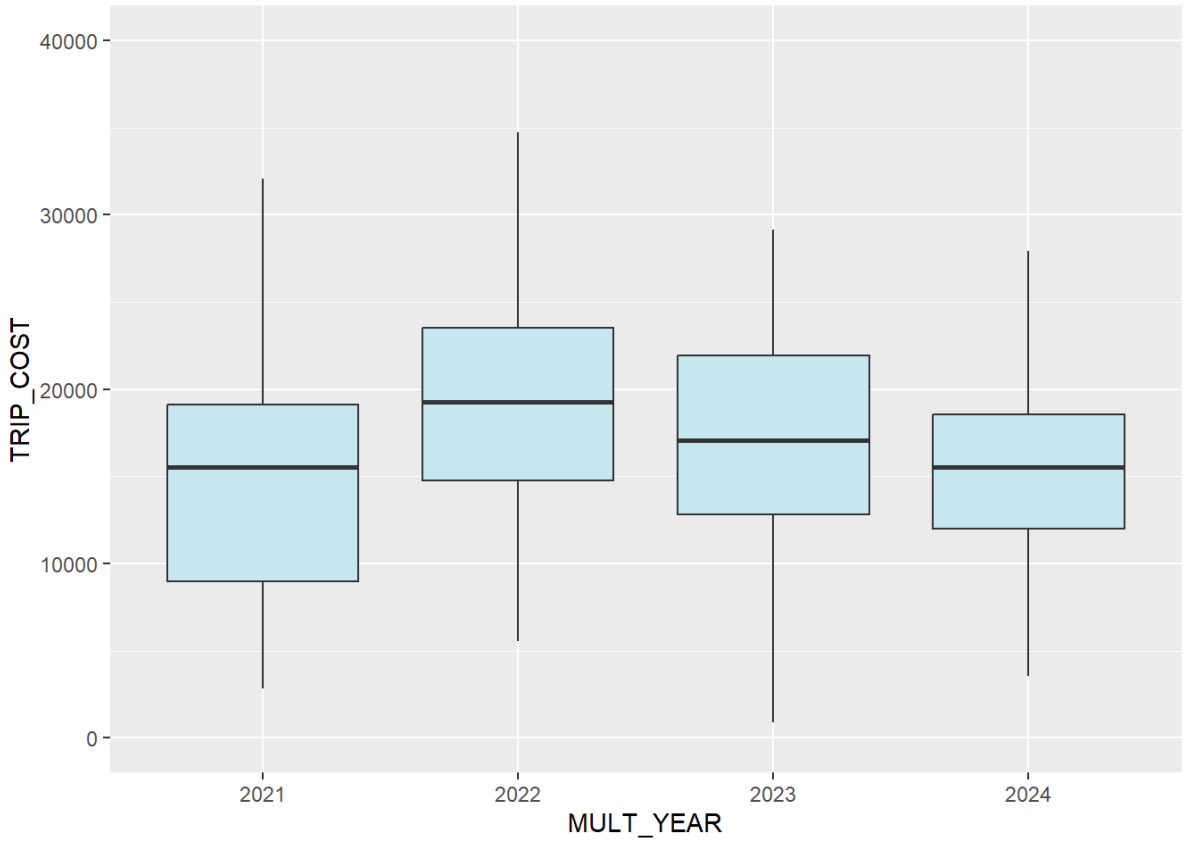
Note: Only vessels with groundfish revenue from exemption trips included

Costs

Operating costs (fuel, ice, food, etc.) are collected by at-sea observers in both the ASM and NEFOP programs. Median operating costs on trips that had at least one redfish exemption sub-trip have generally been in the 15-20k range on an annual basis (Figure 12). Trips comprised entirely of redfish exemption sub-trips have generally had lower operating costs than split trips (trips with an exemption and non-exemption component) (Figure 13). By subtracting gross revenues from operating costs, operating profit is calculated. Note that operating profit does not factor in payments to crew or hired captains

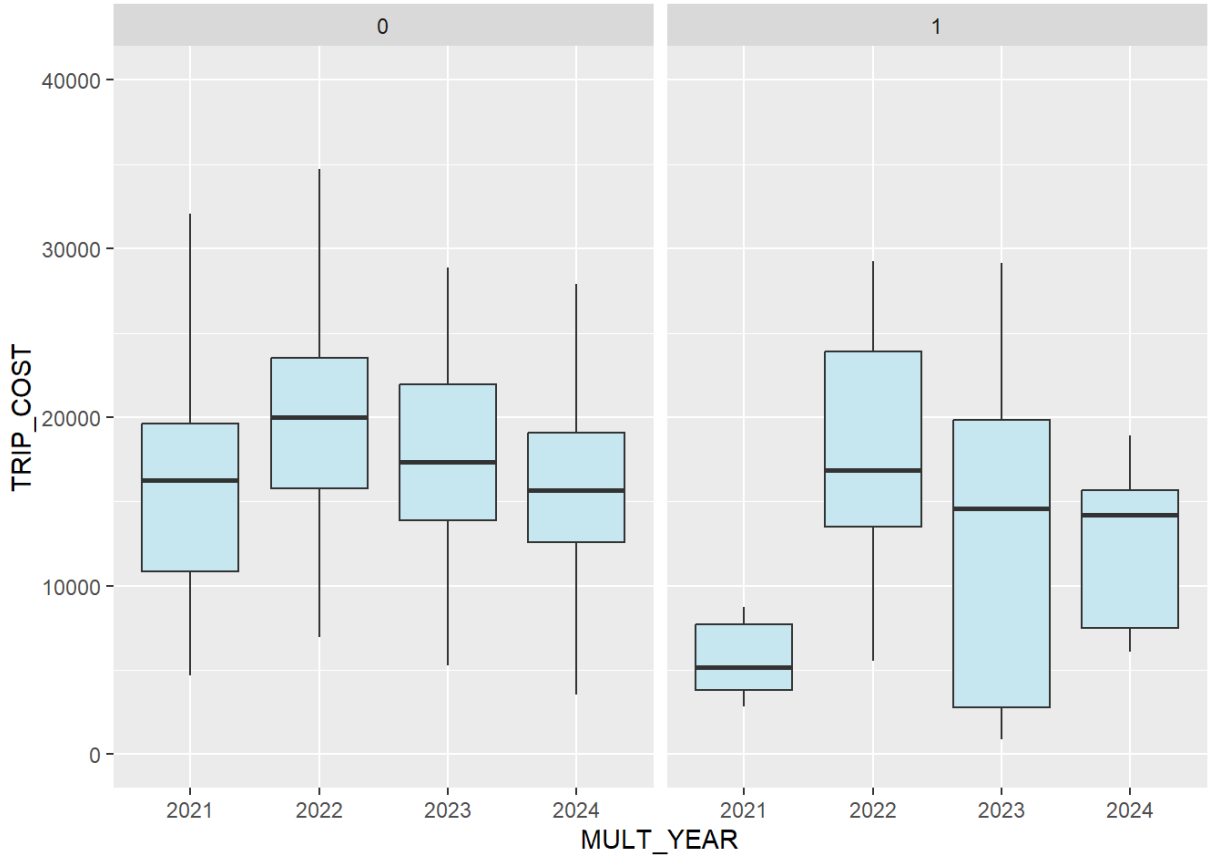
Median trip operating profit have generally been in the 60-70k range on an annual basis from FY2021 - 2023, with a drop-off in FY2024 (Figure 14). When separating out pure vs. split exemption trips, the distribution of operating profits look quite different each year. For example, split trips show higher values in FY2021 and pure trips show higher values in FY2022 (Figure 15).

Figure 12- Distribution of operating costs incurred on trips that had at least one exemption sub-trip, vessel-level, FY2021 – 2024.



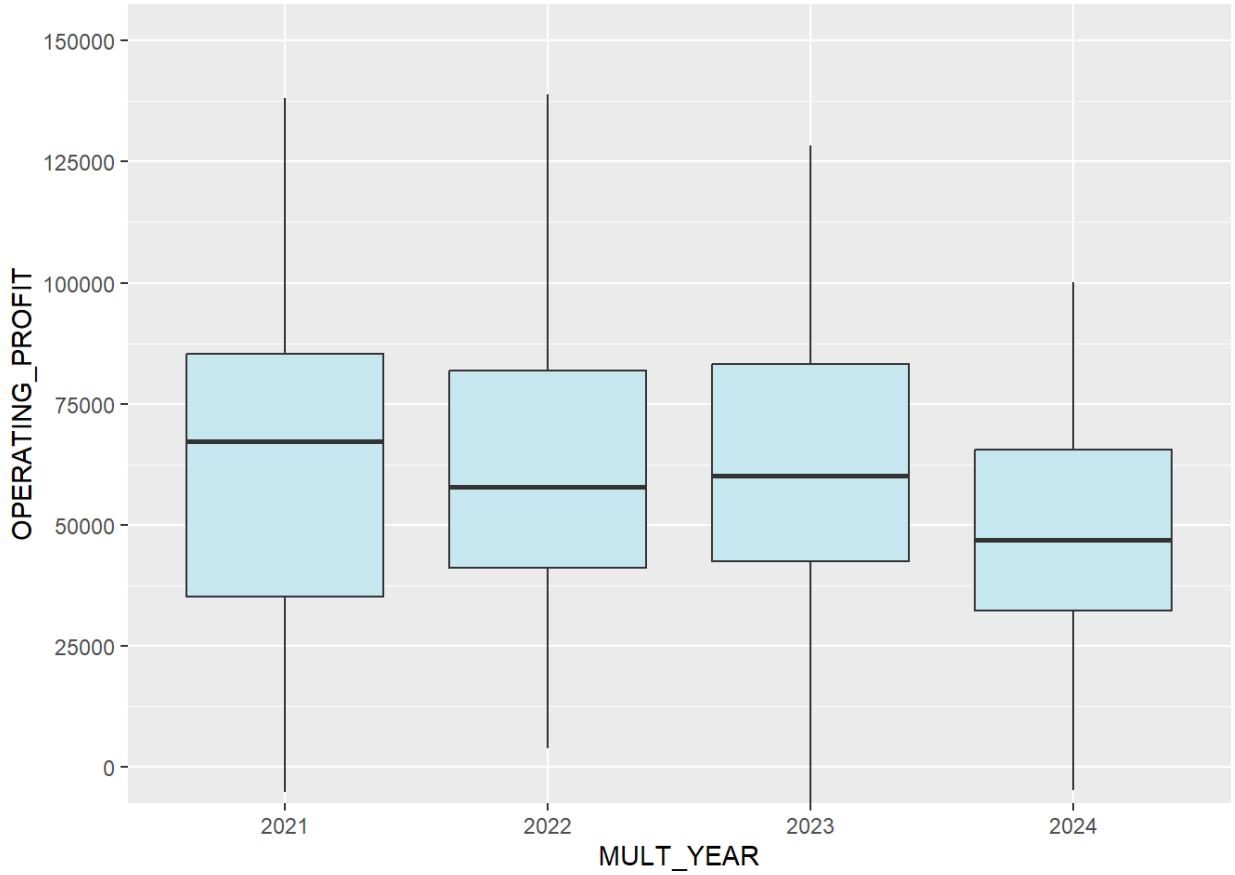
Note: Fishing Year 2021 includes activity following the implementation of the universal redfish exemption on July 28, 2021.
Fishing Year 2024 data covers May - December 2024, January 2025 - April 2025 not included.

Figure 13- Distribution of operating costs incurred on trips that were split between exemption and non-exemption sub-trips (0) vs. trips that were comprised of entirely exemption sub-trips (1), vessel-level, FY2021 – 2024.



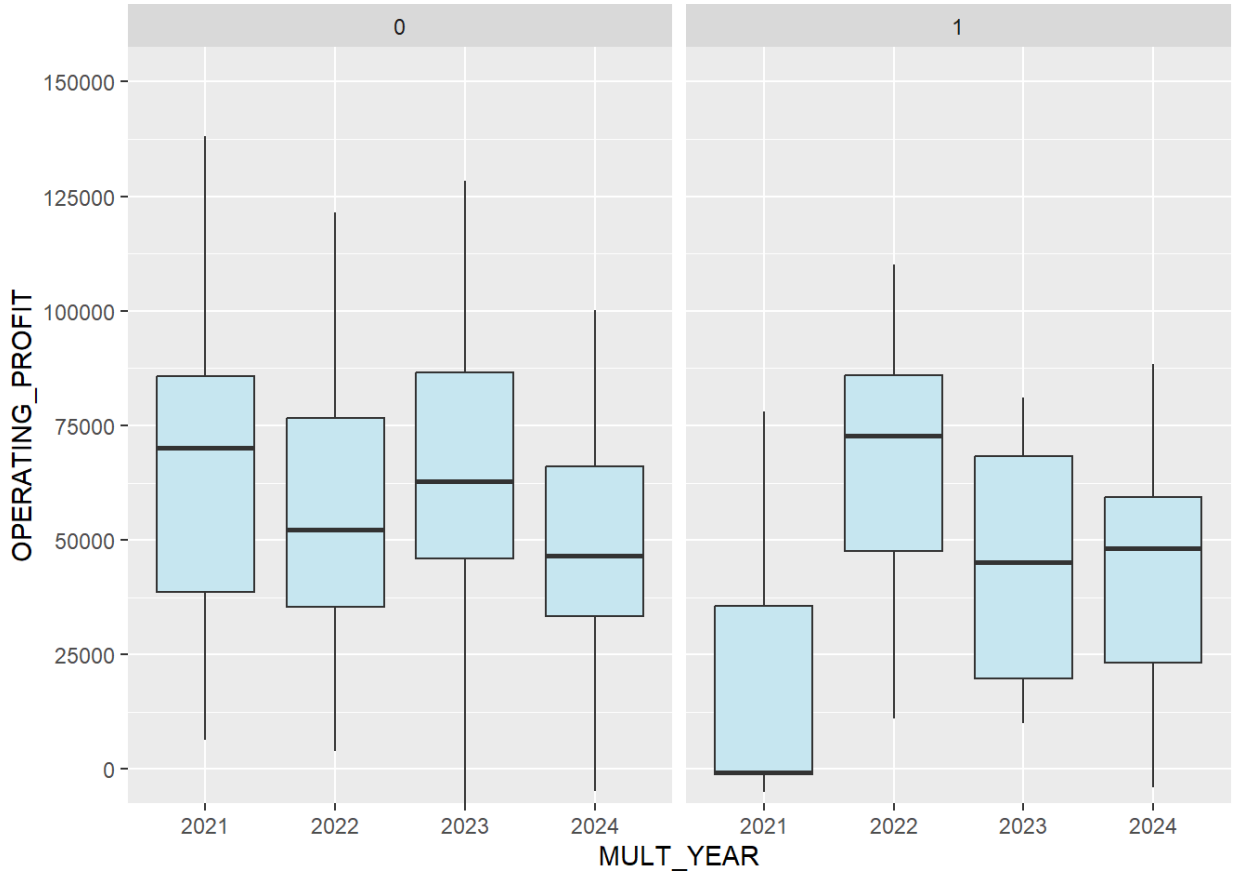
Note: Fishing Year 2021 includes activity following the implementation of the universal redfish exemption on July 28, 2021.
Fishing Year 2024 data covers May - December 2024, January 2025 - April 2025 not included.

Figure 14- Distribution of operating profit generated on trips that had at least one exemption sub-trip, vessel-level, FY2021 - 2024.



Note: Fishing Year 2021 includes activity following the implementation of the universal redfish exemption on July 28, 2021.
Fishing Year 2024 data covers May - December 2024, January 2025 - April 2025 not included.

Figure 15- Distribution of operating profit generated on trips that were split between exemption and non-exemption sub-trips (0) vs. trips that were comprised of entirely exemption sub-trips (1), vessel-level, FY2021 - 2024.



Note: Fishing Year 2021 includes activity following the implementation of the universal redfish exemption on July 28, 2021.
Fishing Year 2024 data covers May - December 2024, January 2025 - April 2025 not included.

Summary of Enforcement Information

NOAA's Office of Law Enforcement (OLE) and U.S. Coast Guard (USCG) representatives provided a summary of general enforcement information regarding the Redfish Sector Exemption Program. To date, there have been no enforcement actions taken specific to the Redfish Exemption Program.

The USCG has the capability to conduct offshore enforcement within the Redfish Exemption Area. This is primarily conducted through monitoring VMS data and at-sea boardings to check for compliance with regulations.

VMS data is monitored daily, and Redfish Exemption Program compliance is checked using a geofence set up for the Redfish Exemption Area. If VMS data indicates that a vessel left the Exemption Area and fished elsewhere, the trip is cross-checked for a Redfish Exemption

Program Multispecies Catch Report and Trip Start Hail. The Trip Start Hail provides some limited assistance for planning purposes but generally does not enhance enforcement capabilities. OLE will contact a vessel if they determine that the vessel is non-compliant.

The Redfish Exemption Program is in the NMS category so a USCG boarding team would target a vessel based on the VMS code. Once onboard, the location, catch, and Letter of Authorization would be the primary elements the team would look at to determine vessel compliance. They would also cross-check the Multispecies Catch Reports and Trip Start Hail forms submitted to NOAA.

At-sea boarding is one of the only ways to confirm that a vessel is not actively fishing with the smaller mesh in an area in which it is not permitted. Coast Guard patrol teams use omega gauges for measuring mesh size during boardings. However, vessels may pull their net before the boarding team arrives, which does not allow much time for the team to board the vessel and document use of the net, particularly if the smaller mesh net is allowed to be on the reel and secured. The USCG has encountered situations in which the undersize net is wet on the reel, but the patrol team cannot prove the vessel was using the smaller mesh in an area in which they were not allowed to use it. For these reasons, mesh size regulations are enforceable, but enforcement is challenging. Overflights can be helpful because the USCG team can get to the vessel using this method before they have time to pull the net in. However, an overflight cannot be used to prove the mesh size.

In late 2021 the USCG conducted a targeted operation for Redfish Exemption Program Compliance with the primary purpose of determining if the vessel was in compliance with mesh size requirements. No action was taken as a result of this operation.

4. Summary of PDT Analyses

Sector compliance with catch thresholds

- Sector compliance with catch thresholds (monthly and annual redfish landings and monthly groundfish discards) has been high. Sectors have generally been achieving the threshold requirements year-to-year.
- To date, there has only been one instance of a sector being put on probation and no sector has been prevented from participating in the program in any year.
- The process for notifying sectors of their performance with the catch thresholds has evolved over time. Since December 2024, NMFS has been sending monthly performance reports to sector managers with vessels participating in the redfish exemption program. Prior to that, documentation and notification of performance was less consistent.

Trends in fleet participation

- Participation in the exemption has been generally stable over time in terms of relative effort, though there have been some fluctuations.
    - The number of participating sectors increased from FY2021 to a high of six in FY2023, before declining to three in FY2024 and FY2025.
    - The number of permits taking redfish exemption trips followed a similar trend, with a high of 19 in FY2023 declining to 13 in FY2025.
    - The number of redfish trips increased from FY2021 to FY2022 and was highest in FY2024 at 114 trips.
    - The number of days fished followed a similar trend. Notably, days fished per trip is highest in FY2025, indicating longer trips taken compared to previous years.
- The majority of vessels participating in the exemption are >75 ft.
    - There are fewer than three vessels <50 ft. in length participating in the exemption each FY
- The majority of redfish exemption trips are "split trips" which utilize the provision to fish Part 1 of a trip outside the exemption and Part 2 under the exemption.

Catch Composition: Total catch/landings/discards by species
Ratio of redfish versus other groundfish (landings and discards)

- Landings:
    - Redfish are the highest landed groundfish species on redfish exemption sub-trips across all years from FY2021 through in-season FY2025.
    - Redfish landings were notably higher in FY2022 and FY2024 compared to other years.
    - Pollock is the second highest landed groundfish species, at roughly 33% of redfish landed values across most years. Haddock is the third highest landed groundfish species.
    - Other groundfish species (white hake, cod, witch flounder, American plaice, winter flounder, and yellowtail flounder) are landed in minimal amounts.

- Discards:
    - Pollock are the highest discarded groundfish species, followed by redfish across all years.
    - Both pollock and redfish discards were notably highest in FY2024.
    - Other groundfish species discards are minimal. In FY2023, discards of haddock were higher than for redfish.
- The proportion of discards to landings is low for redfish, pollock, and other groundfish species.

Seasonal performance

- When examined at the trimester level, the proportion of redfish landings to total groundfish landings ranges from a high of 87.7% in Trimester 3 (January – April) of FY2021 to a low of 48.4% in Trimester 2 (September – December) of FY2025.
- Redfish landings proportions are consistently lowest for Trimester 2 (September – December) while still meeting the 50% threshold.
- Across most years and trimesters, the proportion of groundfish discards is low and well below the 5% bycatch threshold.
    - Exceptions are Trimester 3 in FY2021 at 4.3% and Trimester 2 in FY2024 at 5.3%

Size Composition (length frequencies)

- For all groundfish species examined, there are no significant differences in observer length frequencies or cumulative probabilities between the medium mesh (5-5.8 in) and large mesh (5.9-7 in) for both discarded and kept catch, indicating there is no evidence of any shift in selectivity with the smaller mesh size allowed under the exemption program.
- Low sample sizes for cod and white hake make drawing conclusions difficult, but length frequencies appear to be over the same general ranges for each mesh size.
- These findings are the same as what was seen in previous PDT analysis conducted during development of the universal exemption through FW61 (see Previous PDT analyses), which also did not see any signs of a shift in selectivity with the medium mesh.
    - Identified the same peak lengths in length frequency analysis and similar % discards >= legal size.
    - American plaice and witch flounder had shown a greater proportion of larger fish discarded with the medium mesh in the previous analysis, but those differences seem to have shrunk or disappeared with additional years of data.
- There appears to be some variability in length composition between 2021-2025 for redfish and pollock, but more years of data are needed to determine whether the identified patterns persist.
    - Redfish lengths by mesh size were mostly similar year to year, although there may be a slight narrowing of the range of sizes of discarded fish with increased proportions at 8 inches.
    - Pollock landings appear to show a pattern of decreased proportions of landed fish >25 inch from year to year, with 2025 having the lowest proportions, especially in medium mesh.

Operator-level performance

- Operator-level performance with landings and discards thresholds reflect overall trends in sector performance with thresholds.
- Median percent redfish landings across operators are above the 55% annual threshold for all years. For the three full years under the program, the median percent redfish landings are ~70% in FY2022 and FY2024, and ~65% in FY2023.
    - There is greater variability in percent redfish landings across operators in FY2023 compared to in FY2022 and FY2024.
- Median percent groundfish discards across operators are well below the 5% threshold for all years, at 1-2%.
    - Variability in percent groundfish discards by operator is greatest in FY2024.
- Median percent of observed exemption trips by operator in more recent years is relatively high, at over 80%.
    - There is notable variability in the percent of observed exemption trips by operator across years.

Monitoring coverage levels

- Monitoring coverage levels for redfish exemption trips are similar to and reflect overall monitoring coverage levels for the groundfish fishery.
- FY2024 had the greatest differences, with monitoring coverage for redfish exemption trips lower than overall groundfish fishery realized coverage levels, at roughly 66% compared to 85% total realized coverage.

Economic information: revenue and costs

- 34% of redfish revenue has been generated from exemption sub-trips
- Redfish comprises 71% of groundfish landings and 52% of groundfish revenue from exemption sub-trips
- 8% of Groundfish FMP revenue has been generated from exemption sub-trips
- Vast majority (~90%) of exemption sub-trip revenue generated from groundfish FMP stocks
- Median trip operating profit have generally been in the 60-70k range on an annual basis from FY2021 - 2023, with a drop-off in FY2024

Enforcement information

- To date, there have been no enforcement actions taken specific to the Redfish Exemption Program.
- Offshore enforcement within the Redfish Exemption Area is primarily conducted through monitoring VMS data and conducting at-sea boardings to check for compliance with regulations.
- At-sea boarding is one of the only ways to confirm that a vessel is not actively fishing with the smaller mesh in an area not permitted.
    - Primary purpose of a Coast Guard of a targeted operation conducted in late 2021 (Dec. 13, 2021 – Jan. 8, 2022) for Redfish Exemption Program compliance.
- Mesh size regulations are enforceable, but enforcement is challenging.

5. Conclusions

Across All Analyses

The current exemption program structure and reporting requirements make monitoring the program for compliance challenging as identification of redfish exemption sub-trips is non-intuitive and requires additional steps/criteria. This is due to the interaction of the regulatory language and the constraints of reporting.

- Regulations require that a vessel submits a trip start hail in order to participate in the program during the trip. However, a vessel is not compelled to participate in the program if it submits the trip start hail.
- Vessels may use trawl gear with a minimum of 5.5 inch mesh, but they are not required to use 5.5 inch mesh when fishing under the Redfish Exemption Program.
- Regulations explicitly state that the redfish exemption fishing notification and catch report vessels must submit before switching to a smaller mesh codend allowed under the Redfish Exemption Program is what indicates that the vessel is fishing under the provisions of the Redfish Exemption Program. While this notification is associated with a timestamp, VTR subtrips are not, and the timing of the catch report cannot be matched with the correct subtrip unless the hauls are also observed. Observer data does include timestamps that can be used to match.
- These challenges are increased for unobserved trips for which there is no timestamp to chronologically match catch reports to a specific sub-trip of fishing activity. Thus, these challenges become greater under lower monitoring coverage levels.

The program structure and reporting requirements also have implications for estimation of discard rates. The current discard strata for redfish exemption trips are based on the Trip Start Hail, and not all trips with a Trip Start Hail

- Under high monitoring coverage levels this is less of an issue with discards coming directly from observer data on the majority of trips. But under lower monitoring coverage, this could introduce additional error and uncertainty in discard estimates as these may not be representative of actual redfish exemption fishing activity.

Overall Groundfish PDT Conclusions Based on Analyses

- Sectors are consistently meeting the catch thresholds requirements (monthly and annual redfish landings thresholds, and monthly groundfish discards).
- Redfish are the highest landed groundfish species on redfish exemption sub-trips by a large margin. Discards of groundfish (redfish and other stocks) are low.
- There are no differences in the size of fish discarded and landed between medium mesh and large mesh, suggesting no evidence of any shift in selectivity with use of the smaller mesh size.
- Fleet participation in the exemption has been generally stable over time in terms of relative effort, though there have been some fluctuations in the number of participating sectors, permits, and number of trips. The majority of vessels participating in the exemption are >75 ft. Most redfish exemption trips are "split trips" which utilize the provision to fish Part 1 of a trip outside the exemption and Part 2 under the exemption.

- While participation in the exemption program is relatively low on an annual basis, the vessels that participate generate a substantial portion of their redfish, and more broadly groundfish, revenue from redfish exemption sub-trips.
- Performance metrics appear to indicate the program is meeting its goal and objectives of: allowing use of an efficient mesh size codend to facilitate harvest of redfish while reducing to the extent practicable bycatch of other groundfish stocks, and increasing stability and certainty for participants.
- The minimal landings and discards of other groundfish stocks on redfish exemption trips from FY2021 through in-season FY2025, suggest the current Exemption Area and seasonal closure areas have been effective at reducing bycatch of other groundfish stocks, especially white hake. Bycatch of other groundfish (white hake, pollock, GOM haddock, GB haddock, and GB cod) was the primary driver in the reduction of the Redfish Exemption Area in FY2020 under the previous annual sector exemption process, and led to the development of an additional seasonal closure area under the current Exemption Area.
- The Trip Start Hail is not a reliable indicator of actual redfish exemption trip activity given the relatively large number of trips that use the Trip Start Hail but ultimately do not use the exemption, and so this requirement appears to not be meeting its intended goal. This has implications for monitoring compliance of the program and for discard estimation. It also does not generally enhance enforcement capabilities.

6. *Additional Information*

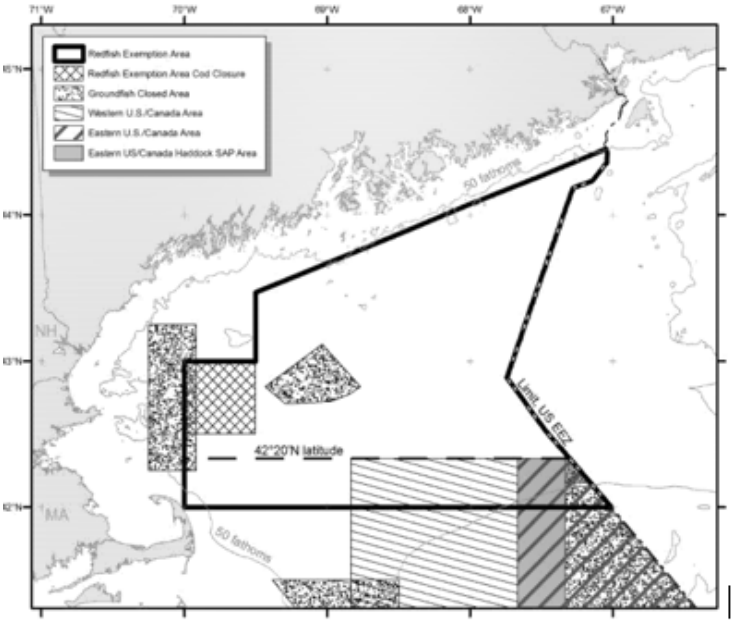
Previous Iterations of the Redfish Exemption

Prior to the development of the universal redfish sector exemption through FW61, there were several previous iterations under the annual sector exemption process. Specifically, there was an iteration of the Redfish Exemption Area approved for FY2015-FY2019 (Map 2), and a refined area approved for FY2020 (Map 3). Both iterations had the same mesh size requirements (5.5" or larger) and the same catch threshold requirements (50% monthly redfish landings and 5% groundfish bycatch).

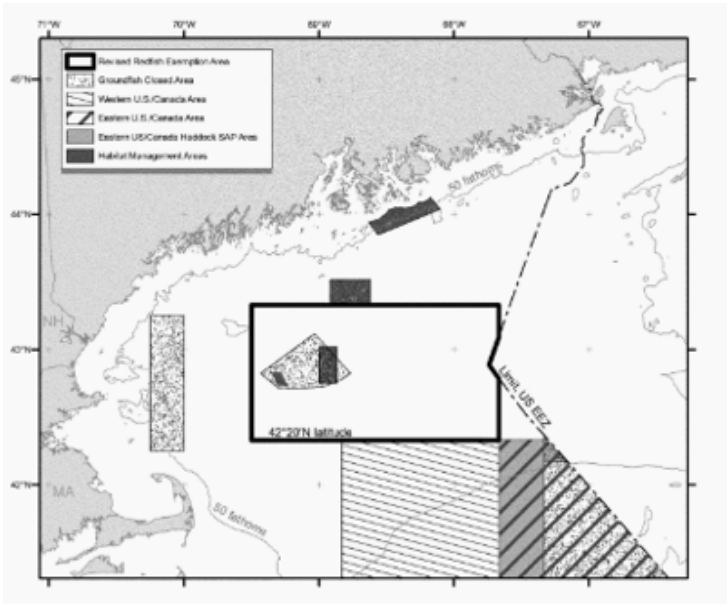
The Redfish Exemption Area was refined by NMFS in the FY2020 Sector Rule (85 FR 23229; April 27, 2020)[1] to address bycatch concerns by removing areas within the FY2015-FY2019 Redfish Exemption Area that had high levels of non-redfish catch (white hake, GB and GOM haddock, pollock, and GB cod).

[1] See: https://www.federalregister.gov/documents/2020/04/27/2020-08399/magnuson-stevens-act-provisions-fisheries-of-the-northeastern-united-states-northeast-multispecies

Map 2- FY2015-FY2019 Redfish Exemption Area



Map 3- FY2020 Redfish Exemption Area



Prior to 2015, there were additional versions of the Redfish Exemption approved annually beginning in FY2012. The table below from the FY2015-FY2016 Sector Final Rule includes a description of the minimum mesh size requirements and monitoring coverage requirements for each year (Table 13). Additionally, the approved exemptions included a redfish landings threshold of 80% (which was based on the findings from the REDNET study[2]) and groundfish bycatch threshold of 5%. These earlier years of the annual exemption generally had low levels of participation.

[2] See: https://s3.amazonaws.com/nefmc.org/9a_REDNET_draft-final-report.pdf

Table 13- Descriptions of previously approved versions of the annual exemption.

Table 7—Previously Approved Versions of the Redfish Exemption

Exemption	Rulemaking	Date	Citation
6.0 inch (15.2 cm) with 100% NMFS-funded coverage	Fishing Year 2012 Sector Operations Final Rule	May 2, 2012	77 FR 26129
4.5 inch (11.4 cm) with 100% NMFS-funded coverage	Fishing Year 2012 Redfish Exemption Final Rule	March 5, 2013	78 FR 14226
4.5 inch (11.4 cm) with 100% Industry-funded coverage	Fishing Year 2013 Sector Operations Interim Final Rule	May 2, 2013	78 FR 25591
6.0 inch (15.2 cm) with standard observer coverage	Fishing Year 2014 Sector Operations Final Rule	April 28, 2014	79 FR 23278
5.5 inch (14.0 cm) with standard observer coverage	Fishing Year 2015-2016 Sector Operations Final Rule	May 1, 2015	80 FR 25143

Previous PDT Analyses

For previous PDT analyses conducted on the earlier years of the annual sector exemption, see PDT analyses conducted during the development of the universal redfish sector exemption, included as an appendix in Framework 61:
4_210611_Groundfish_FW61_Appendix_IV_Redfish_Exemption_Methods.pdf