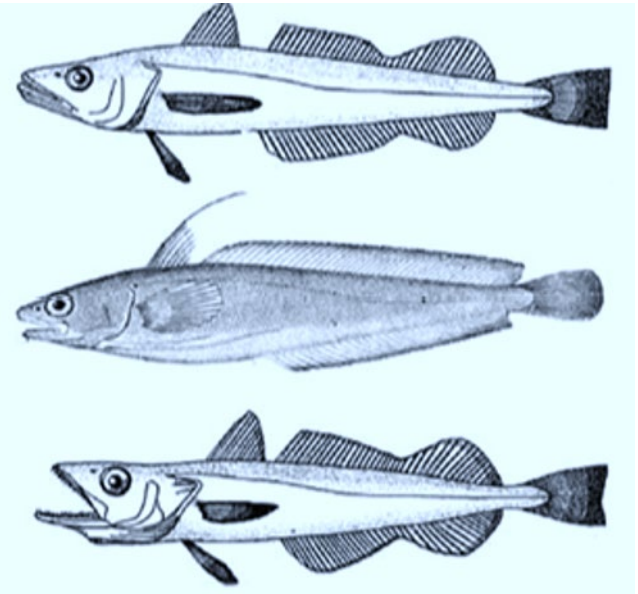
Analysis of southern red hake TAL trigger alternatives

Small-Mesh Multispecies Committee and Advisory Panel Meeting



NEFMC - Whiting PDT

Acknowledgement: Kris Winiarski

November 19, 2026

Historical Fishery Performance & In-Season AM Actions

Evaluating FY 2018–2025 landings, trigger thresholds, and primary landings drivers

Fishing Year	Active TAL	Trigger %	Trigger Threshold	In-Season AM Action Taken	Commercial Landings vs. TAL	Status & Primary Driver
FY 2018	672,410 lbs	90.0%	605,169 lbs	Trigger Met + Cut Enacted (Aug 23)	761,377 lbs (113.2%)	**+88,967 lb Overage** High Whiting effort drove early landings accumulation.
FY 2019	672,410 lbs	90.0%	605,169 lbs	Trigger Met + Cut Enacted (Aug 07)	671,993 lbs (99.9%)	**-417 lb Under TAL** High Whiting effort drove early in-season trigger.
FY 2020	344,125 lbs*	40.4%	139,026 lbs	Trigger Met + Cut Enacted (Aug 25)	586,191 lbs (169.9%)	**+242,066 lb Overage** Reduced TAL (344k) due to payback deduction.
FY 2021	515,882 lbs	40.4%	208,416 lbs	Trigger Met +NO Cut Enacted	400,064 lbs (77.5%)	**-115,818 lb Under TAL** 515k TAL accommodated effort.
FY 2022	515,882 lbs	40.4%	208,416 lbs	Trigger Met + NO Cut Enacted	239,588 lbs (46.4%)	**-276,294 lb Under TAL** 515k TAL accommodated effort.
FY 2023	515,882 lbs	40.4%	208,416 lbs	Trigger Met + NO Cut Enacted	323,075 lbs (62.6%)	**-192,807 lb Under TAL** Lower Whiting effort.
FY 2024	515,882 lbs	40.4%	208,416 lbs	Trigger Met + NO Cut Enacted	372,365 lbs (72.2%)	**-143,517 lb Under TAL** Landings remained under 515k TAL.
FY 2025	515,882 lbs	40.4%	208,416 lbs	Trigger Met + NO Cut Enacted	311,748 lbs (60.4%)	**-204,134 lb Under TAL** Landings maintained safe buffer under 515k TAL.

*Note: FY 2020 TAL was reduced to 346,125 lbs (157.0 mt) due to the mandatory FY 2018 ACL overage payback deduction.

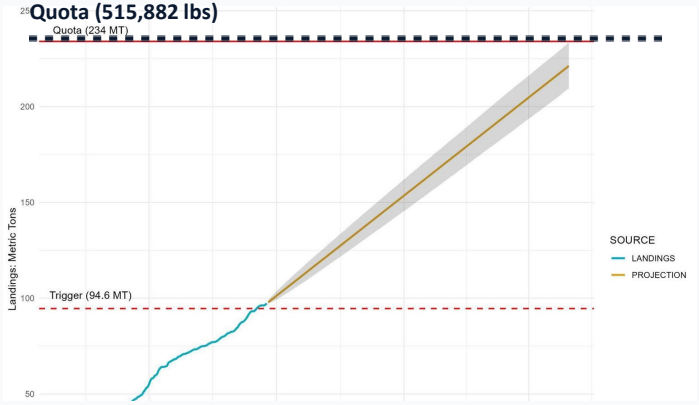
Note Active TAL for FY 2021 through FY 2026 is maintained at 515,882 lbs (234 mt) per official GARFO in-season quota monitoring specifications and the Small-Mesh Multispecies Bulletin.

FY21 Possession limits were reduce from 5,000lbs to 1,000lbs for large mesh and selective gear and 600lbs per trip for standard small mesh.

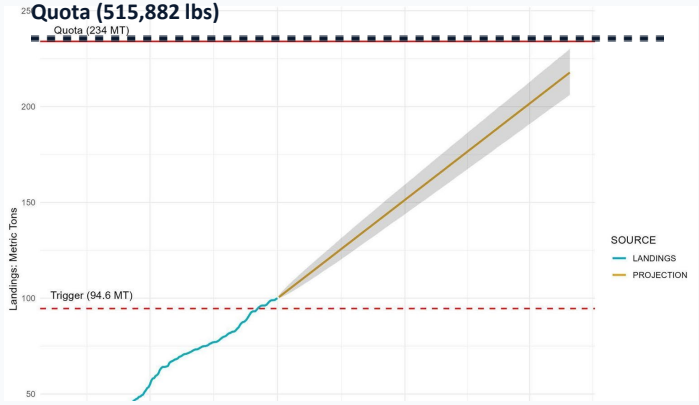
Southern Red Hake 2024 Trigger Evaluation

Cumulative weekly landings tracking against the 208,416 lb Trigger (40.4%) and 515,882 lb Commercial TAL

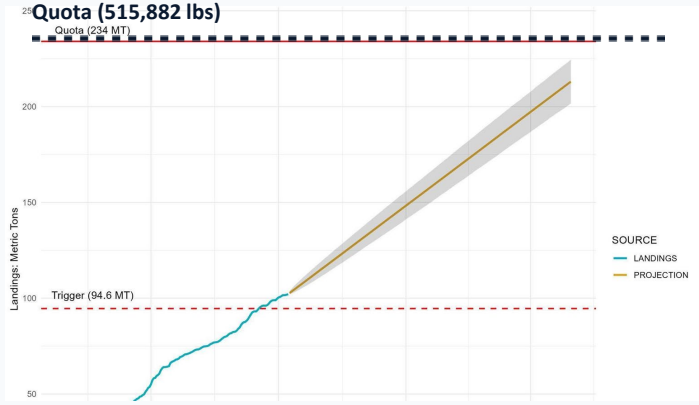
1. Sep 26, 2024 Projection



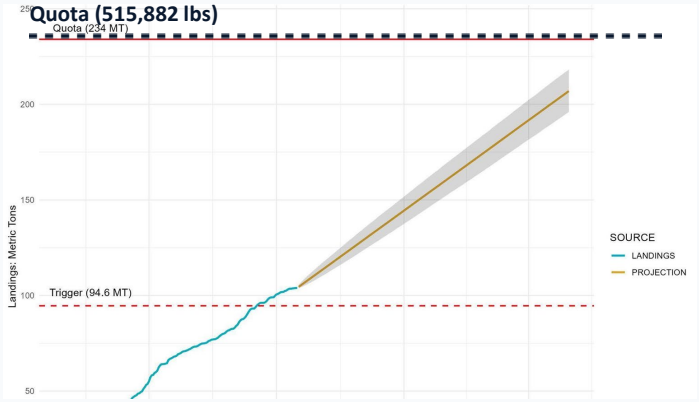
2. Oct 03, 2024 Projection



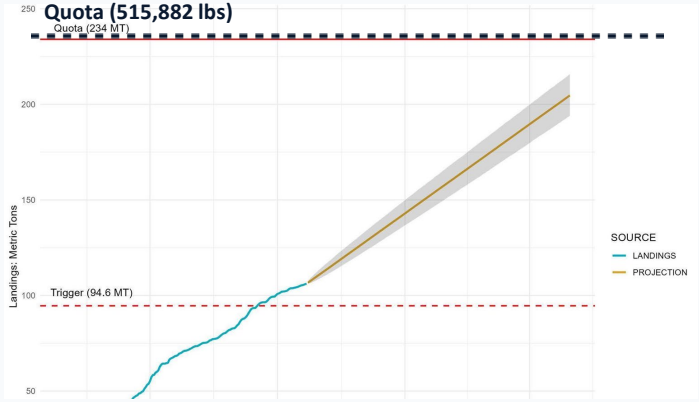
3. Oct 24, 2024 Projection



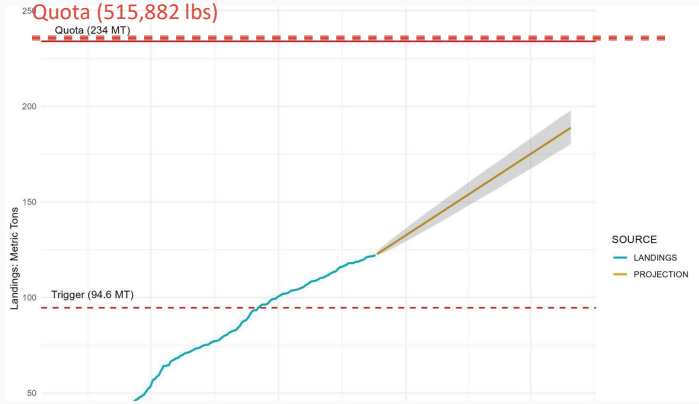
4. Nov 14, 2024 Projection



5. Dec 12, 2024 Projection



6. Latest Projection Update

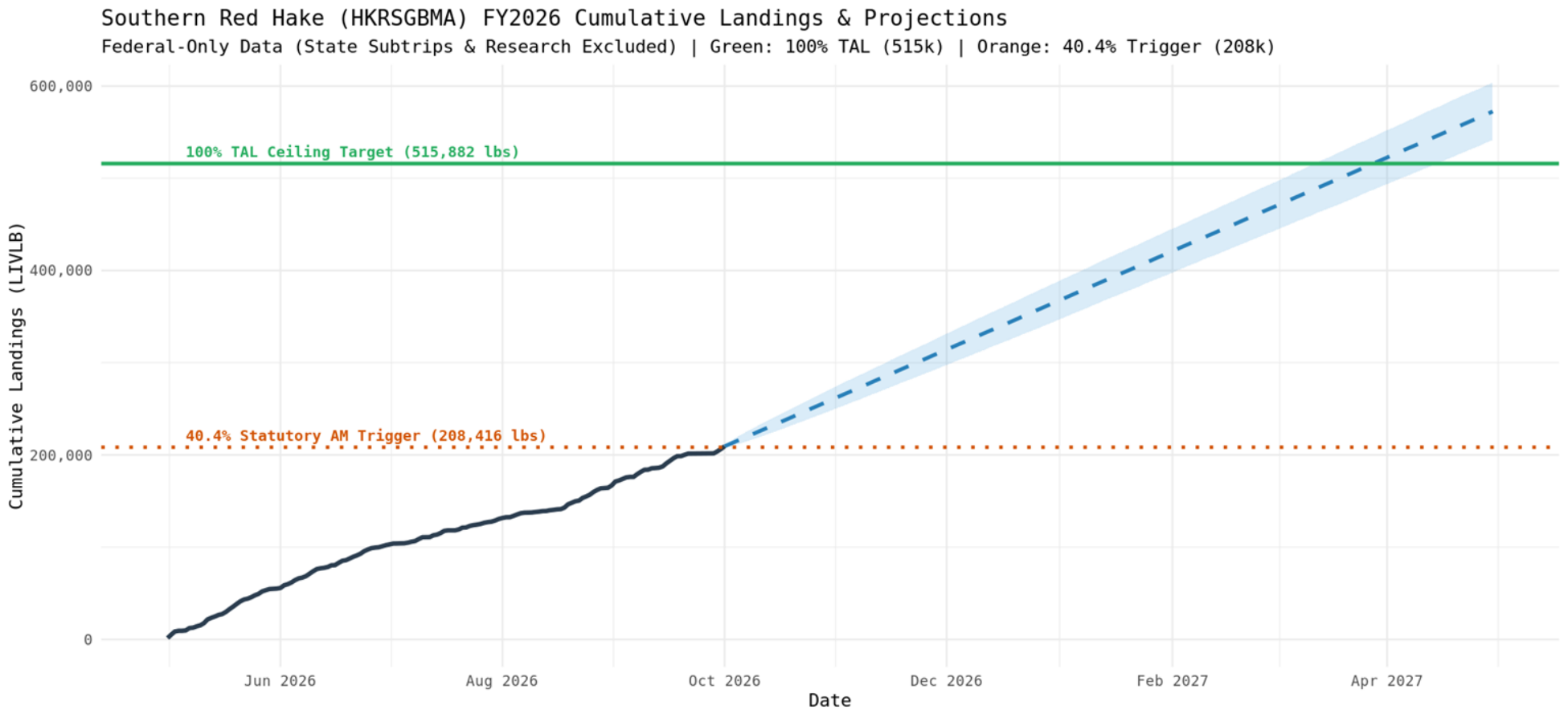


* Projections evaluate cumulative landings trajectory relative to the statutory in-season AM trigger (208,416 lbs) and commercial TAL (515,882 lbs).

Note: Total FY 2024 commercial landings finalized at 372,365 lbs (72.2% of TAL). Although cumulative landings surpassed the 208,416 lb trigger, no in-season trip-limit cut was enacted due to stable trajectory under the higher TAL.

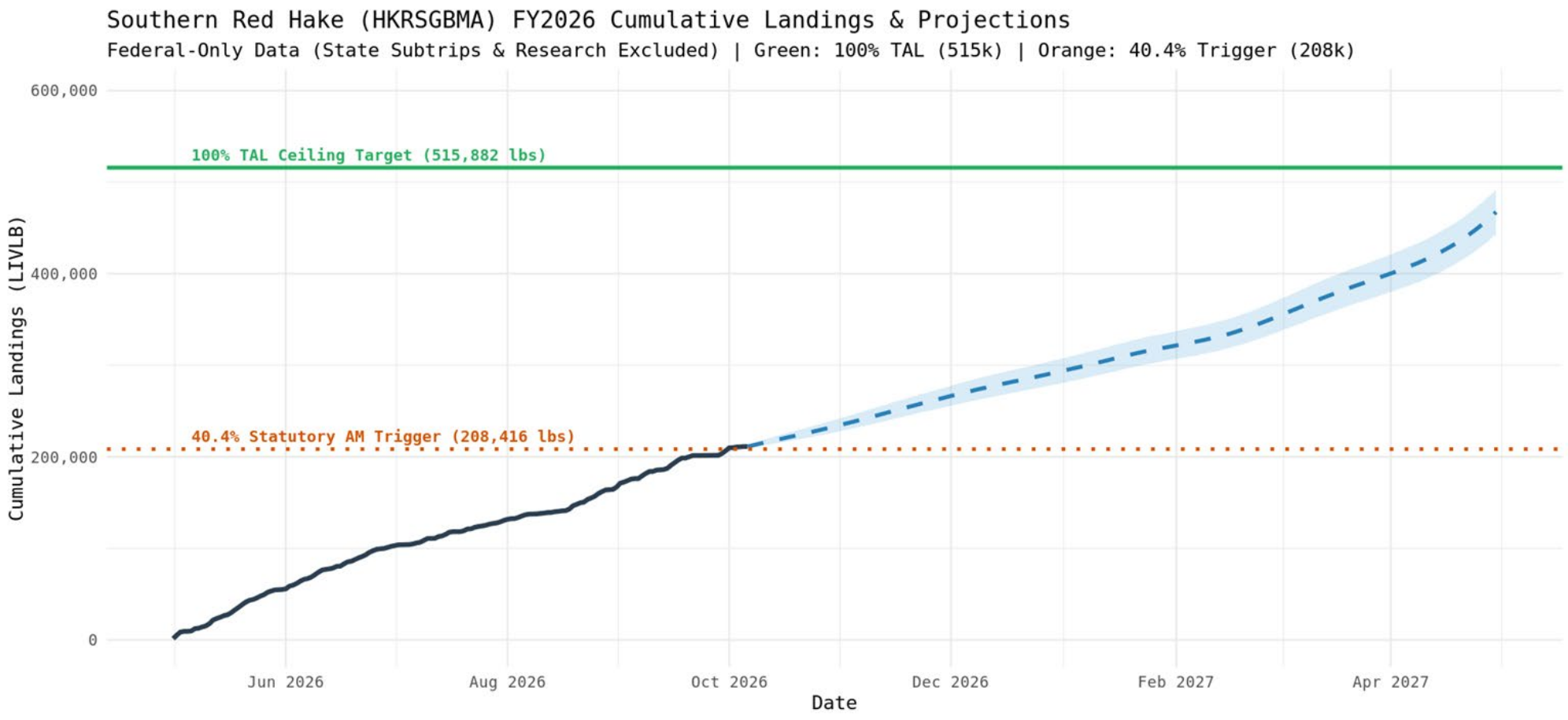
Southern Red Hake 2026 Trigger Evaluation

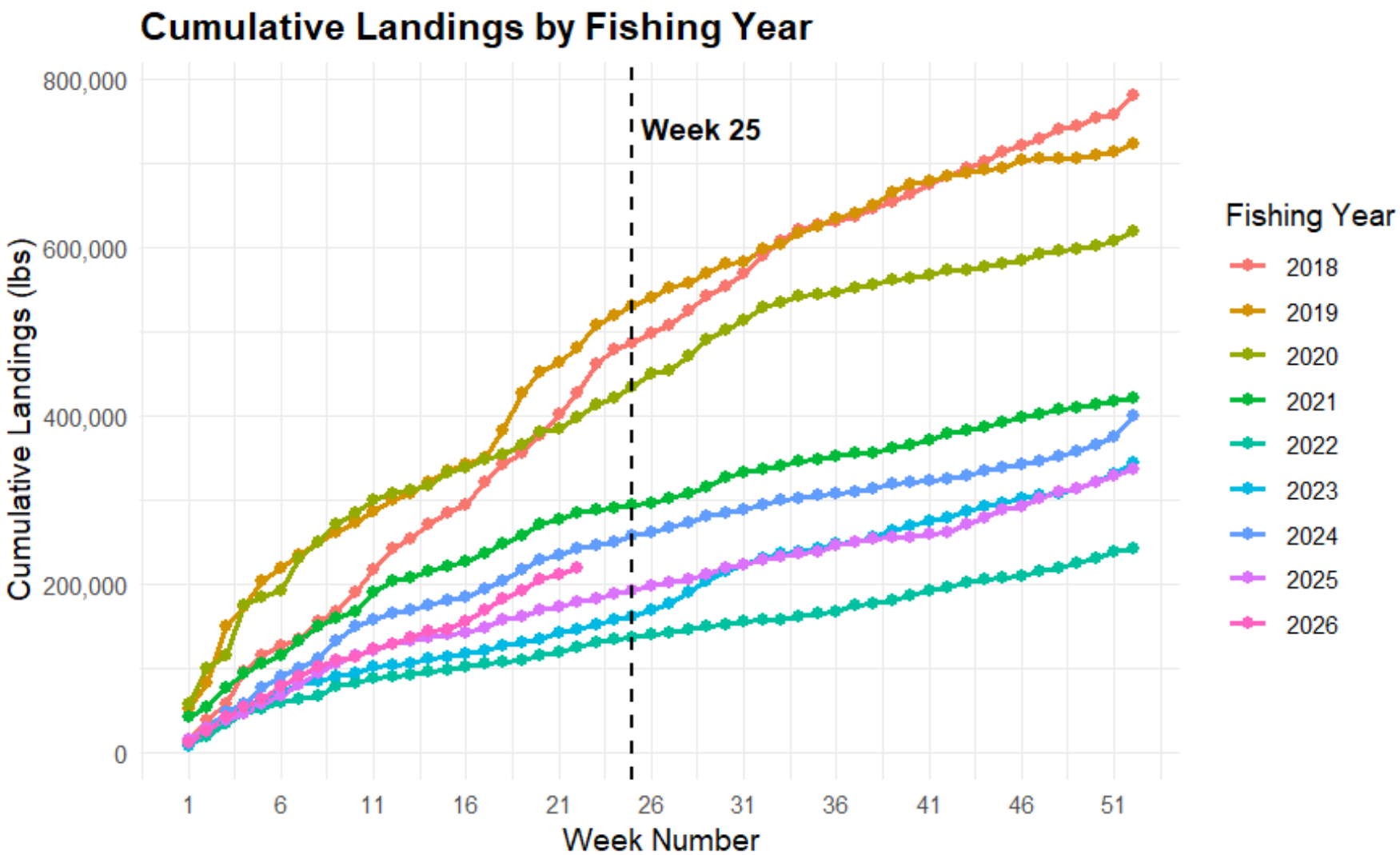
Chronological progression of weekly landings tracking against the 208,416 lb Trigger (40.4%) and 515,882 lb Commercial TAL

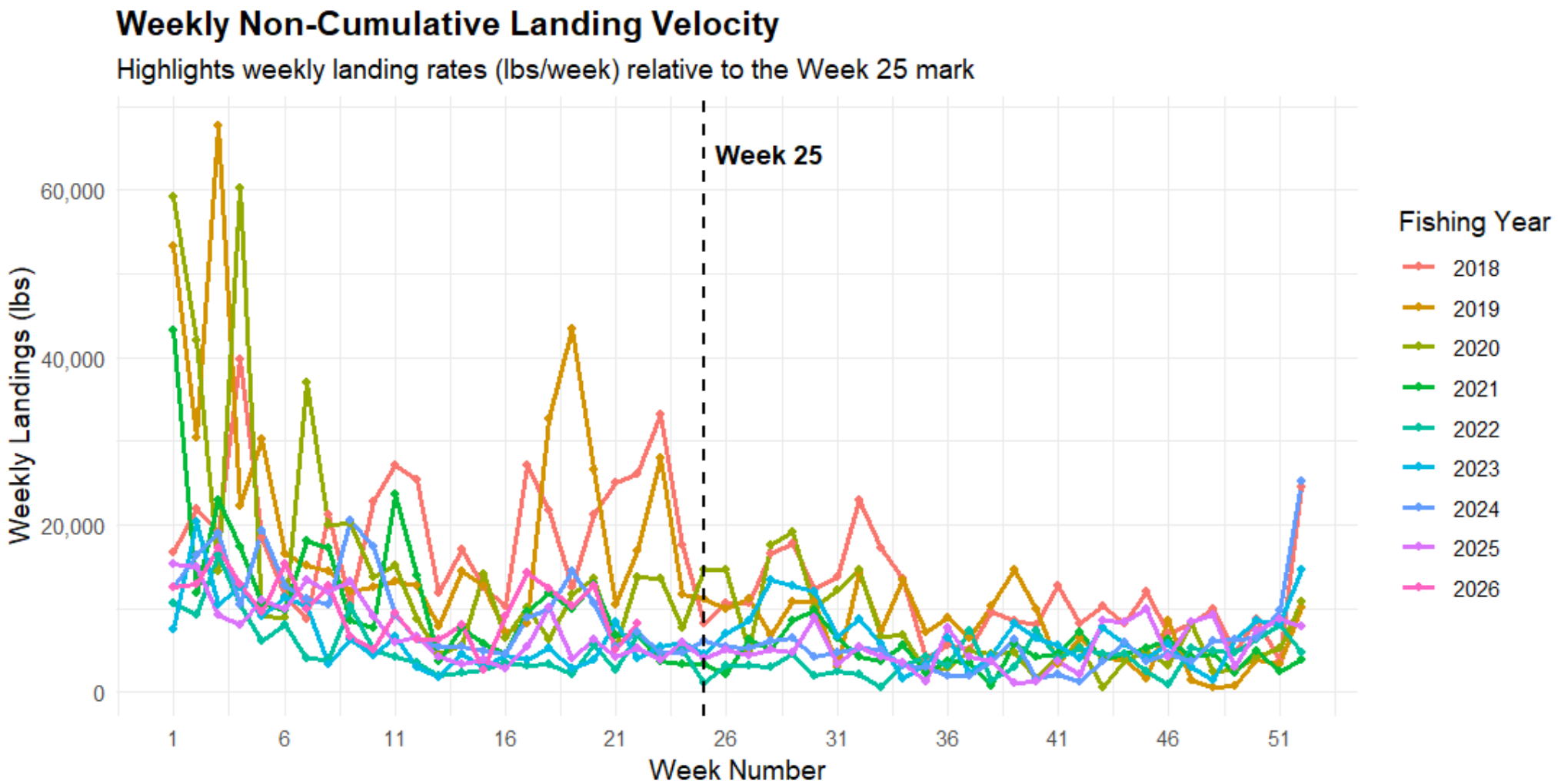


Southern Red Hake 2026 Trigger Evaluation

Chronological progression of weekly landings tracking against the 208,416 lb Trigger (40.4%) and 515,882 lb Commercial TAL




Cumulative Landings by Fishing Year
Week 25
800,000
600,000
400,000
200,000
0
Cumulative Landings (lbs)
1
6
11
16
21
26
31
36
41
46
51
Week Number
Fishing Year
2018
2019
2020
2021
2022
2023
2024
2025
2026


Weekly Non-Cumulative Landing Velocity
Highlights weekly landing rates (lbs/week) relative to the Week 25 mark
Week 25
Weekly Landings (lbs)
60,000
40,000
20,000
0
1
6
11
16
21
26
31
36
41
46
51
Week Number
Fishing Year
2018
2019
2020
2021
2022
2023
2024
2025
2026

Discard Origins Across Target Fleets

FLEET-LEVEL DISCARD CONTRIBUTION (SOUTHERN RED HAKE)

Squid Fishery Group [Longfin / Commercial Trawl]



80.9% (16,203,315 lbs)

Silver Hake / Offshore Hake Trips



14.2% (2,844,092 lbs)

Mixed Small-Mesh / Longfin Trips



4.85% (971,398 lbs)

UNDIRECTED SMALL-MESH IMPACT

95.1%

Combined discards from undirected operations fishing for whiting or squid.

ANALYSIS TAKEAWAY

An analysis of discard origins within the CAMS small-mesh baseline reveals the **Squid Fishery Group (Longfin)** is the primary source of Southern Red Hake discards at **16.20M lbs (80.9%)**.

Undirected small-mesh **Whiting/Silver Hake** trips account for **2.84M lbs (14.2%)** of discards.

ANALYSIS TAKEAWAY

Undirected trips fishing for whiting or squid collectively account for over 95% of all Southern Red Hake discards in this CAMS dataset. ACL overage risk is driven almost entirely by undirected small-mesh operations and is completely decoupled from directed commercial red hake landers (0.05%).

• SCENARIO PARAMETERIZATION

- The simulation evaluated two fleet effort scenarios across four TAL quota baselines and five policy trigger options:
  - Scenario A (Moderate Fleet Effort): Calibrated to FY 2021–2025 average landing levels. Parameters: Pace_Summer = 7,600 lbs/wk; Pace_Winter = 4,900 lbs/wk; Pace_Cut = 4,100 lbs/wk.
  - Scenario B (High Fleet Effort): Calibrated to FY 2018 peak landing levels. Parameters: Pace_Summer = 18,700 lbs/wk; Pace_Winter = 10,200 lbs/wk; Pace_Cut = 10,500 lbs/wk.
  - TAL Quota Baselines: Extreme Low Quota (200k lbs), Low Quota (400k lbs), Baseline TAL (515,882 lbs), and High Quota (1.0M lbs).
  - Policy Trigger Options: Unconstrained (No Trigger), Status Quo (40.4% Trigger), 65.0%, 80.0%, and 90.0% Triggers.

Strategic Evaluation: Updating the AM Trigger

Aligning Policy Mechanics with Fleet Reality & Stock Specifications

CORE DECISION DRIVERS

- **Baseline Origin:** The 40.4% statutory trigger was originally established when there were catch overages (post-season AM). Applied to relatively higher TALs, it creates administrative "false alarms" without offering biological protection.

- **Dual-Fleet Catch Mechanics:** Commercial landings (TAL) are primarily driven by Silver Hake/Whiting trips, whereas discards (ACL) are heavily driven by non-target Longfin Squid (80.9%) and general small-mesh operations. Directed Red Hake landers account for just 5% of total discards.

- **Post-October Ineffectiveness:** Fleet velocity naturally drops from ~14k lbs/wk in summer to <3k lbs/wk in winter. Enacting a 400 lb cap after Oct 1st yields zero biological reduction—merely converting landed catch to mandatory dead discards.

- **Administrative Lag Buffer:** A 3–4 week GARFO rulemaking lag is inevitable. A higher trigger threshold provides the necessary buffer during peak summer velocity without overshooting the overall TAL.

POLICY OPTIONS FOR COUNCIL CONSIDERATION

STATUS QUO — 40.4% TAL (208,416 lbs)
- Rulemaking Lag Buffer: Severe (Triggers too early in season)
- False-Alarm Risk: High (Fires even in low-effort years)
- Regulatory Discard Risk: Severe (Forces dumping on non-target trips)

OPTION A — 65.0% TAL (335,323 lbs)
- Rulemaking Lag Buffer: Moderate (242k lbs runway remaining)
- False-Alarm Risk: Low (Eliminates false triggers during normal run-rates)
- Regulatory Discard Risk: Significantly Reduced

OPTION B — 80.0% TAL (412,706 lbs)
- Rulemaking Lag Buffer: Optimized (138k lbs runway remaining) — Absorbs 3–4 wk GARFO lag.
- False-Alarm Risk: Minimal — Matches natural post-Oct seasonal surge flattening.
- Regulatory Discard Risk: Lowest — Prevents converting landed catch into mandatory dead discards.
- Fleet Alignment: Optimal Utilization — Rebalances trigger mechanics with modern specifications.

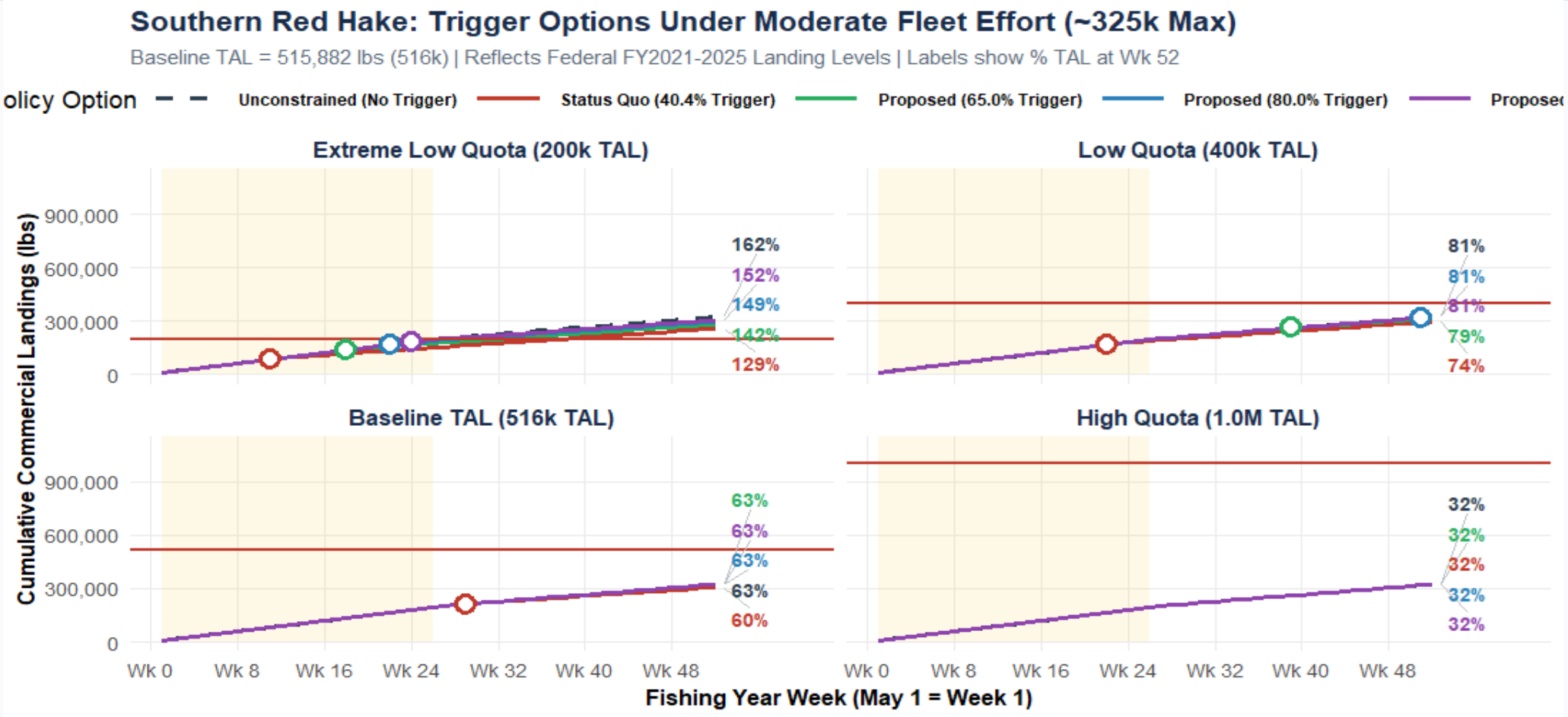
OPTION C — 90.0% TAL (464,294 lbs)
- Rulemaking Lag Buffer: Tight (69k lbs runway remaining)
- False-Alarm Risk: Very Low (Avoids triggering unless full quota exhaustion is imminent)
- Regulatory Discard Risk: Minimal (Eliminates nearly all premature forced discards)

SUMMARY OF COUNCIL DECISION SPACE

Decision Framework: Council options range from maintaining the 40.4% status quo baseline to updating the trigger to 65%, 80%, or 90% of TAL. Higher trigger levels absorb GARFO rulemaking lag during peak summer velocity, reduce unnecessary regulatory discards, and align policy mechanics with the 515,882 lb (516k) quota specification.

Landings Across Quotas (Moderate Landings Rate)

Simulated landings trajectories across quota options assuming 2 week trigger enforcement

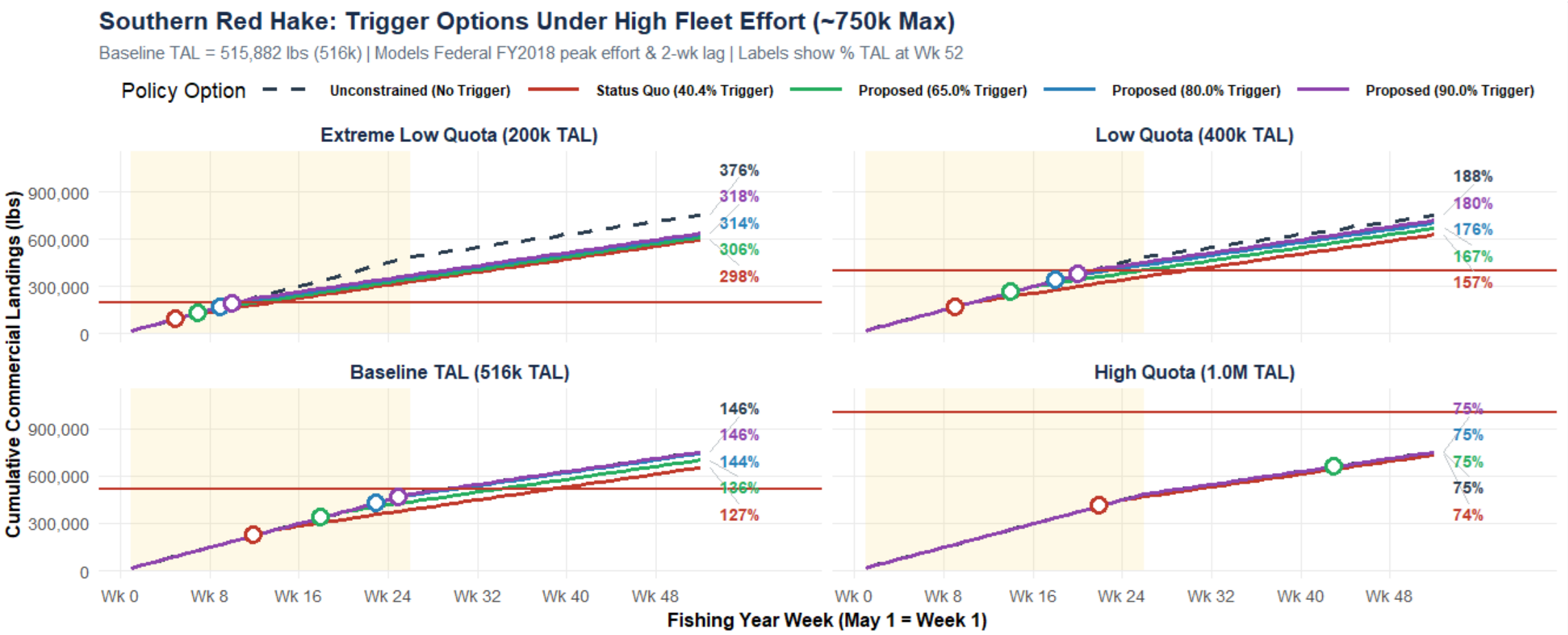


* Trajectories updated using FY2021–2025 CAMS southern red hake landings.

Key Takeaway: The 40.4% trigger is highly sensitive to the TAL baseline. Under low quotas (300k TAL), early triggers fail to prevent overages due to incidental co-landings; under the 516k TAL, moderate landings flattens safely near 340k–400k lbs without requiring in-season trip limit cuts.

Landings Across Quotas (High Landings Rate)

Simulated landings trajectories across quota options assuming 2 week trigger enforcement



* Trajectories updated using FY2018 CAMS southern red hake landings.

Key Takeaway: Here, early triggers under low quotas and the baseline quota fail to prevent TAL from being exceeded.

Evaluating Trigger Threshold Options: 40.4%, 65%, 85%, or 90%

STATUS QUO

40.4% TAL

- Early 400 lb trip limits (June–Aug) despite safe seasonal catch projections.
- Forces marketable whiting/red hake discarded with zero non-target reduction.
- Creates recurring friction for landers without mitigating total ACL overage risk.

OPTION 1

65% TAL

- Preserves ~200+ days of unconstrained commercial landings.
- Provides safety buffer against sudden, unexpected small-mesh discard surges.
- Carries moderate risk of triggering premature 400 lb limits during high-effort years.

OPTION 2

85% TAL

- Recognizes landings are only ~15% of mortality. Maintains operational buffer before TAL exhaustion for end-of-year reporting.
- Leaves tight buffer.

OPTION 3

90% TAL

- Minimizes risk of early restrictive trip limits, maximizing quota utilization.
- Avoids possession limit reductions when total catch is safely managed.
- Leaves tight buffer.