

Allocation Review Triggers

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June 13, 2018



Policy

- Fisheries Allocation Review Policy (NMFS Policy Directive 01-119)
- Criteria for Initiating Fisheries Allocation Reviews (NMFS Procedural Directive 01-119-1)
- Recommended Practices and Factors to Consider (NMFS PD 01-119-2)

Fisheries Allocation Review Policy

- Ensure fisheries allocations are periodically evaluated to remain relevant to current conditions.
- Councils determine triggers for when reviews are performed
- NMFS Regional Administrators and Science Center Directors will support the trigger development and review of decisions.

What is an allocation?

- Generally: ““direct and deliberate distribution of the opportunity to participate in a fishery among identifiable, discrete user groups or individuals.” 50 CFR 600.10;”
- For this directive: “...only allocations that distribute specific quantities to identifiable, discrete user groups or individuals.”

Criteria for Review Initiation (1)

- Structured review of current allocations
- Review might lead to a reallocation action
- Council should define triggers for conducting a review, preferably when adopting allocation

Criteria for Review Initiation (2)

- Goals and objectives of original allocation decision should be considered
 - Are they still relevant?
- Define the management action for potential review
- Monitor and evaluate achievement of goals and objectives
- Adaptive response

Types of Triggers

Trigger Criteria	Description	PROs	CONs
Public Interest-based	Allows the public to request reviews through: 1) ongoing input, 2) solicitation by Council for input, or 3) by formal petition.	Most responsive to perceived or slight changes in fishery performance. Council can determine schedule for solicitation of input.	Sets up public expectations. Vulnerable to political or council dynamics (reviews might never happen, or occur frequently causing fishery instability and increased staff workload).
Time-based	Requires periodic allocation review; Directive suggests every 7-10 years.	Simple and unambiguous. Not vulnerable to political or council dynamics.	Not sensitive to competing Council priorities for staff time and meeting agendas.
Indicator-based	Requires an allocation review when indicator thresholds are met. Indicator criteria can be a mix of economic, social, or environmental criteria or data.	Reviews are not conducted until thresholds are hit.	Relatively complicated to develop indicators and thresholds. Requires continual monitoring of quantitative and qualitative thresholds.

NPFMC Example

“The Council identifies three non-LAPP allocations (the Halibut Catch Sharing Plan and the GOA and BSAI Cod Allocations), and LAPPs as subject to the allocation policy directive. The CDQ allocation is not subject to this review. The Council adopts the LAPP review process for meeting the allocation review policy with the necessary modifications to the LAPP review recommended by staff. **The Council adopts the 10-year timeframe as the primary trigger criteria for review for non-LAPP allocations, and the existing Council public input process as the secondary trigger criteria for review.** The Council will specify its approach to allocation review at final action for any future allocation decisions.”

Lessons Learned

- Work closely with NMFS to determine allocations subject to the policy.
- Carefully consider the tradeoffs of trigger types, while ensuring periodic review of allocations.
- Integrate allocation reviews into LAPP reviews for efficiency.
- Need to resolve the disconnect between procedural directive on relevant factors and methodology for reviews (PD 01-119-02) with wording that in-depth analyses are not required at Allocation Review stage.



Possible Triggers Needed

- LAGC IFQ (as part of LAPP requirements)
- Scallop IFQ/LA shares (and maybe NGOM as well)
- Rec/commercial groundfish allocations (GOM cod and GOM haddock at present)
- Groundfish sub-ACL allocations (e.g. SNE/MA and GOM/GB windowpane flounder, GB YTF, SNE/MA YTF, GB haddock allocated to herring MWTs, etc.)

Questions for Council

- Should we adopt a standard trigger or FMP-specific triggers?
- If standard trigger, what type?
- If time-based, what schedule?

Questions?