Amendment 25 (Revised)

to the

Northeast Multispecies Fishery Management Plan

Appendix IV

Development of Phase 1 Measures for Atlantic Cod Management Transition Plan: Common Pool and Recreational Measures

New England Fishery Management Council
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Rick Bellavance, *Chair* | Cate O'Keefe, PhD, *Executive Director*

MEMORANDUM

DATE: October 23, 2024

TO: Groundfish Committee

FROM: Groundfish Plan Development Team

SUBJECT: Common pool trimester TAC distributions and areas for cod stocks

The Groundfish Plan Development Team (PDT) met as a sub-group on October 4 and 16, 2024, and as a whole on October 18, 2024, to discuss analysis to support development of Framework 69 cod measures for Phase 1 of the Atlantic Cod Management Transition Plan. This memorandum focuses on the Committee tasking analysis to develop common pool trimester total allowable catch (TAC) distributions and areas for the new cod stocks.

Background

At their June 11, 2024, meeting, the Groundfish Committee tasked the PDT with the following motion:

> *The Groundfish Committee tasks the Plan Development Team (PDT) to determine the appropriate trimester TAC areas and trimester TAC distributions that may be needed for common pool management to adequately prevent overfishing of four stocks under Option 2 (4 stock TACs) (see Groundfish PDT memo to Committee dated June 5, 2024).*

1. Trimester TAC Distributions

The PDT followed the methodology established in Amendment 16 to use the most recent five-year period to determine trimester TAC distributions.

For each stock, the PDT examined the percentage of common pool catch by trimester over FY2019-2023. The PDT also looked at total catch, trip count, and permit count for context.

Table 1- Common pool percent catch by trimester, total catch (lbs), trip count, and permit count for FY2019-2023 by cod stock.

Fishing Year	Stock	Percent Trimester 1	Percent Trimester 2	Percent Trimester 3	Total Catch (lbs)	Trip Count	Permit Count
2019	EGOM Cod	91.76	0	8.24	1.7	28	5
2020		99.58	0	0.42	19.25	36	8
2021		100	0	0	0.78	23	5
2022		77.44	22.55	0	2266.36	54	11
2023		91.79	0	8.21	2.8	39	12
AVG		92	5	3			
2023	GB Cod	0	0	100	NA*	2	1
2019	SNE Cod	14.01	49.46	36.53	3184.57	122	34
2020		40.64	32.66	26.7	5444.34	203	35
2021		34.24	32.1	33.66	2996.03	179	36
2022		27.58	23.82	48.61	5707.01	250	33
2023		63.49	14.53	21.98	8996.07	276	36
AVG		36	31	33			
2019	WGOM Cod	55.01	26.33	18.67	10235.33	353	59
2020		60.57	19.01	20.42	7057.79	310	55
2021		49.61	18.55	31.84	9084.19	225	37
2022		36.9	26.64	36.46	18541.69	227	32
2023		69.25	20	10.74	27642.54	256	38
AVG		54	22	24			

*NA due to confidentiality

Note the very low number of trips for the Georges Bank (GB) area. There were also relatively low number of trips from few permits in the Eastern Gulf of Maine (EGOM) area. The PDT took a closer look at the four years with very low catch in EGOM. With the exception of a few pounds in 2020, all of the values contributing to those low values come from estimated discards, and are the result of low sub-trip Kall values x broadstock discard rate x discard mortality rate.

For GB cod, the PDT recommends an alternative approach of distributing the trimester TACs evenly, to avoid setting any trimester TAC percentages at 0%.

Table 2- Proposed common pool trimester TAC distributions.

Stock	Trimester 1	Trimester 2	Trimester 3
EGOM Cod	92%	5%	3%
GB Cod	33%	33%	34%
SNE Cod	36%	31%	33%
WGOM Cod	54%	22%	24%

2. Trimester TAC Areas

The PDT followed the Amendment 16 methodology for determining the trimester TAC closure areas as the statistical areas that make up 90% of catches for each cod stock. This analysis uses commercial (common pool and sector) catches. The PDT examined catches in the most recent five years (FY2019-2023).

In Table 2 below, the statistical areas highlighted in bold contribute to 90% of commercial cod catches on average over the five-year period for each stock area. Greyed out areas contribute to the remainder. See Attachment for more detail.

The PDT recommends defining trimester TAC areas based on the statistical areas contributing to 90% of commercial catches in recent years (those highlighted in bold).

For cod stocks, trimester TAC areas would close to all gear types.

Table 3- Average percent contribution of commercial catches over the five-year period by statistical area and the number of years contributing towards 90% of commercial catches, for each cod stock.

Stock	Stat Area	Average Percent	Years in Top 90%
EGOM	**512**	**77.2**	**5**
EGOM	**511**	**13.4**	**1**
EGOM	**465**	**9.4**	**3**
GB	**522**	**69.8**	**5**
GB	**561**	**28.7**	**5**
GB	562	0.6	0
GB	464	0.5	0
GB	525	0.3	0
GB	542	0.0	0
GB	543	0.0	0
SNE	**539**	**62.7**	**5**
SNE	**537**	**13.8**	**5**
SNE	**613**	**11.9**	**5**
SNE	611	6.8	3
SNE	612	3.9	0
SNE	538	0.6	0
SNE	614	0.2	0
SNE	615	0.1	0
SNE	622	0.1	0
SNE	533	0.0	0
WGOM	**521**	**45.3**	**5**
WGOM	**514**	**29.0**	**5**
WGOM	**513**	**16.0**	**5**
WGOM	515	9.6	2
WGOM	526	0.0	0

Table 4- Proposed trimester TAC areas that would close when 90% of trimester TAC reached. Closures would apply to all gear types.

Stock	Statistical Areas
EGOM	465, 511, 512
GB	522, 561
SNE	537, 539, 613
WGOM	513, 514, 521

Differential Days-At-Sea

Prior to Amendment 16, differential days-at-sea (DAS) was used as an effort control, whereby vessels fishing in certain areas were charged a higher ratio of DAS. As part of the transition to

sectors under Amendment 16 (2010), differential DAS was maintained in the FMP as a common pool accountability measure for 2010 and 2011, and replaced by the trimester TAC system in 2012. Framework 44 (2010) provided the Regional Administrator with the authority to implement differential DAS counting in 2012 and beyond, to prevent overharvest or underharvest of groundfish stocks by the common pool. Each stock has a prescribed differential DAS area, in which DAS would be counted at a different ratio if adjusted.

Rather than attempt to adapt the existing authority to implement differential DAS to include the four new cod stocks, the PDT recommends the removal of this provision entirely. It has not been used since the transition to the Trimester TAC system, which is used to prevent overharvest of groundfish stocks by the vessels fishing under the provisions of the common pool. Instead, the Regional Administrator adjusts common pool possession limits to prevent over- and underharvest of groundfish stocks.

Common Pool Trip Limits

The PDT notes that common pool trip limits for various permit categories for the cod stocks will need to be developed as part of Framework 69. This follow-up work is expected to be completed in November.

Attachment

Commercial cod catches by area

Statistical areas highlighted in bold contribute to 90% of commercial cod catches for each stock area in a given year. Greyed out areas contribute to the remainder.

Fishing Year	Stock	Area	Percent Catch	Cumulative Catch
2019	**CODEGOM**	**512**	**83.79**	**83.79**
2019	**CODEGOM**	**465**	**9.55**	**93.34**
2019	CODEGOM	511	6.66	100
2020	**CODEGOM**	**512**	**84.89**	**84.89**
2020	**CODEGOM**	**465**	**14.73**	**99.62**
2020	CODEGOM	511	0.38	100
2021	**CODEGOM**	**512**	**97.95**	**97.95**
2021	CODEGOM	465	1.36	99.31
2021	CODEGOM	511	0.69	100
2022	**CODEGOM**	**511**	**54.48**	**54.48**
2022	**CODEGOM**	**512**	**42.61**	**97.09**
2022	CODEGOM	465	2.91	100
2023	**CODEGOM**	**512**	**76.91**	**76.91**
2023	**CODEGOM**	**465**	**18.34**	**95.25**
2023	CODEGOM	511	4.75	100
2019	**CODGBT**	**522**	**72.07**	**72.07**
2019	**CODGBT**	**561**	**26.31**	**98.38**
2019	CODGBT	562	1.29	99.67
2019	CODGBT	525	0.22	99.89
2019	CODGBT	464	0.11	100
2019	CODGBT	543	0	100
2020	**CODGBT**	**522**	**67.25**	**67.25**
2020	**CODGBT**	**561**	**31.75**	**99**
2020	CODGBT	525	0.71	99.71
2020	CODGBT	464	0.22	99.93
2020	CODGBT	562	0.07	100
2020	CODGBT	543	0	100
2021	**CODGBT**	**522**	**67.76**	**67.76**
2021	**CODGBT**	**561**	**29.41**	**97.17**
2021	CODGBT	562	1.9	99.07
2021	CODGBT	525	0.47	99.54
2021	CODGBT	464	0.42	99.96
2021	CODGBT	542	0.04	100
2022	**CODGBT**	**522**	**61.2**	**61.2**
2022	**CODGBT**	**561**	**37.21**	**98.41**
2022	CODGBT	464	0.84	99.25
2022	CODGBT	562	0.69	99.94

Attachment

2022	CODGBT	525	0.06	100
2022	CODGBT	542	0	100
2023	**CODGBT**	**522**	**80.48**	**80.48**
2023	**CODGBT**	**561**	**18.61**	**99.09**
2023	CODGBT	464	0.88	99.97
2023	CODGBT	562	0.03	100
2023	CODGBT	525	0	100
2023	CODGBT	542	0	100
2019	**CODSNE**	**539**	**74.36**	**74.36**
2019	**CODSNE**	**537**	**11.66**	**86.02**
2019	**CODSNE**	**613**	**6.76**	**92.78**
2019	CODSNE	612	4.2	96.98
2019	CODSNE	611	2.66	99.64
2019	CODSNE	614	0.28	99.92
2019	CODSNE	538	0.08	100
2019	CODSNE	533	0	100
2019	CODSNE	615	0	100
2019	CODSNE	622	0	100
2020	**CODSNE**	**539**	**61.39**	**61.39**
2020	**CODSNE**	**613**	**21.08**	**82.47**
2020	**CODSNE**	**537**	**12.87**	**95.34**
2020	CODSNE	611	2.08	97.42
2020	CODSNE	612	1.2	98.62
2020	CODSNE	615	0.54	99.16
2020	CODSNE	622	0.5	99.66
2020	CODSNE	538	0.33	99.99
2020	CODSNE	533	0.01	100
2020	CODSNE	614	0	100
2021	**CODSNE**	**539**	**55.85**	**55.85**
2021	**CODSNE**	**613**	**15**	**70.85**
2021	**CODSNE**	**537**	**14.67**	**85.52**
2021	**CODSNE**	**611**	**7.02**	**92.54**
2021	CODSNE	612	6.88	99.42
2021	CODSNE	614	0.58	100
2021	CODSNE	538	0	100
2021	CODSNE	615	0	100
2021	CODSNE	622	0	100
2021	CODSNE	533	0	100
2022	**CODSNE**	**539**	**55.48**	**55.48**
2022	**CODSNE**	**537**	**17.84**	**73.32**
2022	**CODSNE**	**611**	**14.92**	**88.24**
2022	**CODSNE**	**613**	**7.44**	**95.68**
2022	CODSNE	612	3.8	99.48
2022	CODSNE	538	0.52	100

Attachment

2022	CODSNE	614	0	100
2022	CODSNE	615	0	100
2022	CODSNE	622	0	100
2022	CODSNE	533	0	100
2023	**CODSNE**	**539**	**66.32**	**66.32**
2023	**CODSNE**	**537**	**11.74**	**78.06**
2023	**CODSNE**	**613**	**9.13**	**87.19**
2023	**CODSNE**	**611**	**7.33**	**94.52**
2023	CODSNE	612	3.56	98.08
2023	CODSNE	538	1.92	100
2023	CODSNE	614	0	100
2023	CODSNE	615	0	100
2023	CODSNE	622	0	100
2023	CODSNE	533	0	100
2019	**CODWGOM**	**521**	**50.61**	**50.61**
2019	**CODWGOM**	**514**	**24.63**	**75.24**
2019	**CODWGOM**	**513**	**14.92**	**90.16**
2019	CODWGOM	515	9.82	99.98
2019	CODWGOM	526	0.02	100
2020	**CODWGOM**	**521**	**51.07**	**51.07**
2020	**CODWGOM**	**514**	**26.22**	**77.29**
2020	**CODWGOM**	**515**	**11.79**	**89.08**
2020	**CODWGOM**	**513**	**10.73**	**99.81**
2020	CODWGOM	526	0.19	100
2021	**CODWGOM**	**521**	**55.34**	**55.34**
2021	**CODWGOM**	**514**	**22.77**	**78.11**
2021	**CODWGOM**	**513**	**12.61**	**90.72**
2021	CODWGOM	515	9.28	100
2021	CODWGOM	526	0	100

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Rick Bellavance, *Chair* | Cate O'Keefe, PhD, *Executive Director*

MEMORANDUM

DATE: November 18, 2024

TO: Groundfish Committee

FROM: Groundfish Plan Development Team

SUBJECT: Follow-up on common pool measures for cod stocks

The Groundfish Plan Development Team (PDT) met as a sub-group on November 1, 2024, and as a whole on November 13, 2024, to discuss follow-up analysis to develop common pool measures for the new cod stocks. This includes both follow-up analysis for developing common trimester TAC distributions and areas and analysis to develop default common pool trip limits.

Background

At their October 29th, 2024, meeting, the Groundfish Committee tasked the PDT with the following motion:

> *The Groundfish Committee tasks the PDT to provide additional information and analysis to inform further refinement of the common pool trimester TAC closure areas for the cod stocks.*

1. Trimester TAC Distributions

The PDT investigated the higher common pool catches reported for 2022 for the Eastern Gulf of Maine (EGOM) area[1]. The source of the higher landings (~2000 lbs) in common pool in EGOM for 2022 was due to a VTR mis-attributing catch to statistical area 511 (in EGOM), rather than the Western Gulf of Maine (WGOM). This has been corrected and is reflected below in Table 1. As a result, this changes the trimester percentages of catch over the most recent five years for EGOM and WGOM.

[1] See Table 1 in "241023 Memo GF PDT to CMTE re common pool trimester TAC analysis for cod stocks": https://d23h0vhsm26o6d.cloudfront.net/4d_241023-GF-PDT-memo-to-CMTE-re-cod-common-pool-trimester-TAC-analysis-FW69_with-attachment.pdf

Table 1- Common pool percent catch by trimester, total catch (lbs), trip count, and permit count for FY2019-2023 by cod stock.

Fishing Year	Stock ID	Trimester 1 Percent	Trimester 2 Percent	Trimester 3 Percent	Total Catch (lbs)	Number of Trips	Number of Permits
2019	EGOM	91.8	0.0	8.2	1.7	28	5
2020	EGOM	99.6	0.0	0.4	19.3	36	8
2021	EGOM	100.0	0.0	0.0	0.8	23	5
2022	EGOM	94.3	4.1	1.6	3.2	54	11
2023	EGOM	90.1	0.0	9.9	2.6	40	13
AVG		95	1	4			
2023	GB	0.0	0.0	100.0	NA*	2	1
2019	SNE	14.0	49.5	36.5	3184.6	122	34
2020	SNE	40.6	32.7	26.7	5444.3	203	35
2021	SNE	34.2	32.1	33.7	2996.0	179	36
2022	SNE	27.6	23.8	48.6	5707.0	250	33
2023	SNE	63.5	14.5	22.0	8995.7	277	36
AVG		36	31	33			
2019	WGOM	55.0	26.3	18.7	10235.3	353	59
2020	WGOM	60.6	19.0	20.4	7057.8	310	55
2021	WGOM	49.6	18.6	31.8	9084.2	225	37
2022	WGOM	41.3	26.2	32.5	20807.9	239	32
2023	WGOM	69.3	20.0	10.7	27642.5	256	37
AVG		55	22	23			

*NA due to confidentiality

For EGOM, the PDT suggests 80%, 10%, 10%, to set at a minimum level for each trimester. This revised trimester TAC distribution will facilitate catch similar to historical levels in trimester 1. Given that underages from one trimester roll into the next, it is expected that the remaining trimester TAC amounts in trimesters 2 and 3 will be sufficient for bycatch levels of cod in the EGOM.

Table 2- Proposed common pool trimester TAC distributions.

Stock	Trimester 1	Trimester 2	Trimester 3
EGOM Cod	80%	10%	10%
GB Cod	33%	33%	34%
SNE Cod	36%	31%	33%
WGOM Cod	55%	22%	23%

2. Trimester TAC Areas

As described in the October 23rd memo[2], the PDT followed the Amendment 16 methodology for determining the trimester TAC closure areas as the statistical areas that make up 90% of catches for each cod stock. This analysis uses commercial (common pool and sector) catches. The PDT examined catches in the most recent five years (FY2019-2023).

The PDT provides additional information on common pool catches by statistical area in response to the Committee's tasking in Attachment 1. The PDT also updated the previous analysis to reflect the data correction for EGOM, which results in a different proposal for trimester TAC closure areas for EGOM than what was previously included. **The PDT continues to recommend defining trimester TAC areas based on the statistical areas contributing to 90% of commercial catches in recent years** (Table 3). This accounts for commercial activity as a whole, and avoids a situation where the trimester TAC areas do not adequately cover areas where relevant stocks of cod are available. In this case, continued catch by the common pool in open water could result in trimester or sub-ACL overages.

Table 3- Average percent contribution of total commercial catches over the five-year period (FY2019-2023) by statistical area and the number of years contributing towards 90% of commercial catches, for each cod stock.

Total 2019-2023 Cod Catch By Area			
Stock	Area	Average Percent of Total Catch	Years in Top 90%
EGOM	**512**	**87.0**	**5**
EGOM	465	10.1	3
EGOM	511	2.9	0
EGOM	467	0.0	0

[2] "241023 Memo GF PDT to CMTE re common pool trimester TAC analysis for cod stocks": https://d23h0vhsm26o6d.cloudfront.net/4d_241023-GF-PDT-memo-to-CMTE-re-cod-common-pool-trimester-TAC-analysis-FW69_with-attachment.pdf

GB	**522**	**69.8**	**5**
GB	**561**	**28.7**	**5**
GB	562	0.8	0
GB	464	0.5	0
GB	525	0.3	0
GB	542	0.0	0
GB	543	0.0	0
SNE	**539**	**62.7**	**5**
SNE	**537**	**13.7**	**5**
SNE	**613**	**11.9**	**4**
SNE	611	6.8	3
SNE	612	3.9	0
SNE	538	0.6	0
SNE	614	0.2	0
SNE	615	0.1	0
SNE	622	0.1	0
SNE	533	0.0	0
SNE	534	0.0	0
SNE	616	0.0	0
SNE	621	0.0	0
WGOM	**521**	**45.3**	**5**
WGOM	**514**	**29.1**	**5**
WGOM	**513**	**16.0**	**5**
WGOM	515	9.6	2
WGOM	526	0.0	0
WGOM	541	0.0	0

Table 4- Proposed trimester TAC areas that would close when 90% of trimester TAC reached. Closures would apply to all gear types.

Stock	Statistical Areas
EGOM	512
GB	522, 561
SNE	537, 539, 613
WGOM	513, 514, 521

3. Default Common Pool Trip Limits

Default common pool trip limits for the new cod stocks need to be developed as part of Framework 69. The PDT makes the following recommendations for default trip limits for the different common pool permit categories (Days-At-Sea (DAS), Handgear A (HA), Handgear B (HB), and Small Vessel Category), as well as recommendations for updates to the process used by the Regional Administrator to adjust common pool trip limits.

1. Trip limit recommendations

   - EGOM: Sub-ACL estimated to be 1.6 mt
     - Average per trip landings were 42 lb
     - **Suggest 25 lb per DAS/50 lb per trip *OR* 50 lb per trip as DAS permit limits**
     - Supports a reasonable amount of cod bycatch consistent with historical landings

   - GB: Sub-ACL estimated to be 2.1 mt
     - Extremely minimal effort on GB cod in recent years, only 2023 w/ <3 trips by < 3 vessels
     - Propose matching EGOM limit this year to support small amount of bycatch (**25 lb per DAS/50 lb per trip OR 50 lb per trip as DAS permit limits)**

   - SNE: Sub-ACL estimated to be 0.12 mt
     - **0 lb trip limit/possession prohibited**
     - The common pool sub-ACL for SNE cod is insufficient to maintain any amount of landings; even at 25 lb per trip, it would take <11 trips to exceed the sub-ACL.

   - WGOM: Sub-ACL estimated to be 8.2 mt
     - This is slightly reduced relative to the 9.8 mt sub-ACL for GOM cod in FY 2024. However, WGOM should see higher effort relative to GOM given the inclusion of former GB statistical areas with active fishing in previous years.
     - A trip limit analysis was conducted for trips in FY2018 to present in WGOM stat area that followed the methods used to set initial FY 2024 catch limits and described below:
       - During any part of the time period, trips exceeding the proposed possession limit were adjusted down to land the proposed limit. During time periods when the possession limit was less than the proposed limit, if the landing was greater than or equal to 80% of the then possession limit the trip was assumed to be constrained by the possession limit. In this case the trip landings were adjusted up to the proposed possession limit. Trip landings of less than 80% of the then possession limit were not adjusted.
       - For trips in statistical areas in "old" GOM, GOM trip limits at the time of the trip were used, likewise for trips in GB.
       - The highest 12-month rolling sum for adjusted landings was between Aug 2022-Jul 2023.
       - The analysis was run for 3 daily/trip proposed possession limit scenarios for landings: 50/100 lbs, 100/200 lbs, and 150/300 lbs
         - Under 50/100 lb limit estimates are 13,295 lbs (6.0 mt)
         - Under 100/200 lb limits estimates are 16,320 lbs (7.4 mt)

    - Under 150/300 lb limits, estimates are 19,379 lbs (8.8 mt) Note: this estimate is above the proposed sub-ACL of 8.2 mt. Therefore, the PDT does not recommend considering further.
- When examining discards in the WGOM stat areas, there were some higher values (~2000 lbs over 12 months), but these numbers were driven primarily by high discards in FY2018. Since FY 2020, cumulative discards over 12-month periods ranged from 50lbs to 750 lbs.
- From this analysis, **the PDT recommends the Committee consider one of two options for daily/trip proposed possession limit:**
    - 50 lb per DAS/100 lb per trip
    - 100 lb per DAS/200 lb per trip

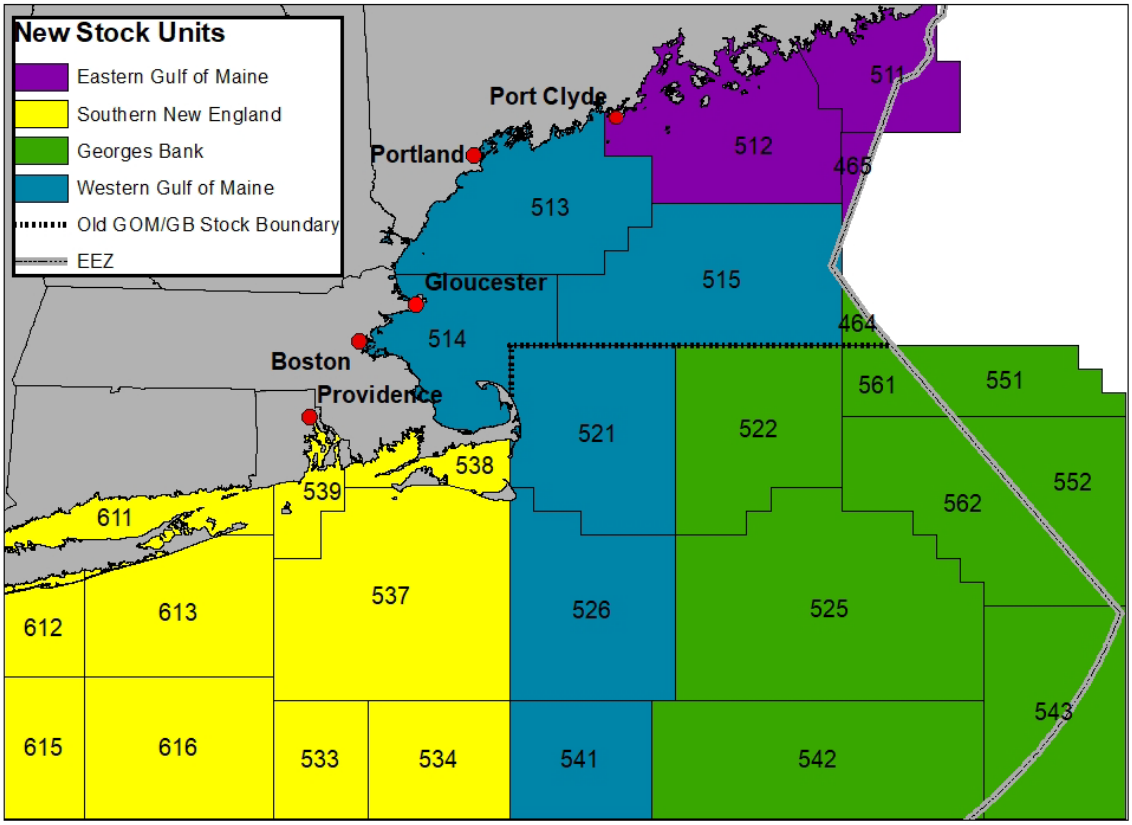
2. HA, HB, and Small Vessel recommendations

    - HA should remain tied to the DAS limit (i.e. if the A DAS limit is 50 lb per DAS, then the HA limit would be 50 lb per trip), and the 300 lb cap should remain.

    - HB should be set at 25 lb per trip (consistent with past years) for FY2025, except for stocks with a trip limit at 0. Instead of a proportional system for determining this limit, the RA should have the authority to set limits for HB up to 75 lb per trip (the current maximum in the proportional method), consistent with the methodology used for other permits (the "in-house" analysis provided above).

    - For the Small Vessel Category, regulations should be clarified regarding the 300 lb combined trip limit for cod, yellowtail, and haddock and that small vessel category vessels are also subject to limits for those stocks below 300 lb (i.e. if the A DAS limit for cod is 50 lb per DAS, then Small Vessel Category will have a limit of 50 lb per trip on cod nested within its overall 300 lb limit for the cod, haddock, and yellowtail flounder). The Council could consider, in a future action, whether the 300 lb combined limit for these three stocks is still appropriate for the small vessel category.

Figure 1- New stock unit boundaries for the four new cod stocks along with the previous GOM/GB stock boundary outlined for reference. Note that Canadian catch is only included in the GB cod assessment.



Attachment 1

Average percent contribution of common pool catches over the five-year period (FY2019-2023) by statistical area and the number of years contributing towards 90% of catches, for each cod stock.

Common Pool Only 2019-2023 Cod Catch By Area			
Stock	Area	Average Percent of Total Catch	Years in Top 90%
EGOM	**512**	**95.2**	**5**
EGOM	511	4.8	1
EGOM	465	0.0	0
EGOM	467	0.0	0
GB	**561**	**100.0**	**1**
GB	464	0.0	0
GB	522	0.0	0
GB	525	0.0	0
GB	542	0.0	0
GB	543	0.0	0
GB	562	0.0	0
SNE	**539**	**50.9**	**5**
SNE	**613**	**21.5**	**5**
SNE	611	9.9	3
SNE	537	9.3	3
SNE	612	7.4	2
SNE	538	0.6	0
SNE	615	0.3	0
SNE	614	0.2	0
SNE	533	0.0	0
SNE	534	0.0	0
SNE	616	0.0	0
SNE	621	0.0	0
SNE	622	0.0	0
WGOM	**514**	**64.3**	**5**
WGOM	**513**	**17.0**	**3**
WGOM	**521**	**13.9**	**4**
WGOM	515	4.8	1
WGOM	526	0.0	0
WGOM	541	0.0	0

Attachment 1

Average percent contribution of sector catches over the five-year period (FY2019-2023) by statistical area and the number of years contributing towards 90% of catches, for each cod stock.

Sector Only 2019-2023 Cod Catch By Area			
Stock	Area	Average Percent of Total Catch	Years in Top 90%
EGOM	**512**	**87.0**	**5**
EGOM	**465**	**10.1**	**3**
EGOM	511	2.9	0
EGOM	467	0.0	0
GB	**522**	**69.8**	**5**
GB	**561**	**28.6**	**5**
GB	562	0.8	0
GB	464	0.5	0
GB	525	0.3	0
GB	542	0.0	0
GB	543	0.0	0
SNE	**539**	**67.1**	**5**
SNE	**537**	**28.4**	**5**
SNE	613	2.0	0
SNE	611	1.8	0
SNE	538	0.4	0
SNE	622	0.2	0
SNE	614	0.1	0
SNE	612	0.0	0
SNE	533	0.0	0
SNE	534	0.0	0
SNE	615	0.0	0
SNE	616	0.0	0
SNE	621	0.0	0
WGOM	**521**	**45.7**	**5**
WGOM	**514**	**28.6**	**5**
WGOM	**513**	**16.1**	**5**
WGOM	515	9.6	2
WGOM	526	0.0	0
WGOM	541	0.0	0

Percent contribution of total commercial catches annually from FY2019-2023 by statistical area, for each cod stock.

FY	STOCK_ID	AREA	PERC_TOT	SUM_TOT
2019	EGOM	512	83.8	83.8
2019	EGOM	465	9.6	93.3
2019	EGOM	511	6.7	100.0
2019	EGOM	467	0.0	100.0
2020	EGOM	512	84.9	84.9
2020	EGOM	465	14.7	99.6
2020	EGOM	511	0.4	100.0
2020	EGOM	467	0.0	100.0
2021	EGOM	512	98.0	98.0
2021	EGOM	465	1.4	99.3
2021	EGOM	511	0.7	100.0
2021	EGOM	467	0.0	100.0
2022	EGOM	512	91.3	91.3
2022	EGOM	465	6.2	97.6
2022	EGOM	511	2.4	100.0
2022	EGOM	467	0.0	100.0
2023	EGOM	512	77.0	77.0
2023	EGOM	465	18.4	95.4
2023	EGOM	511	4.6	100.0
2023	EGOM	467	0.0	100.0
2019	GB	522	72.1	72.1
2019	GB	561	26.3	98.4
2019	GB	562	1.3	99.7
2019	GB	525	0.2	99.9
2019	GB	464	0.1	100.0
2019	GB	543	0.0	100.0
2019	GB	542	0.0	100.0
2020	GB	522	67.3	67.3
2020	GB	561	31.8	99.0
2020	GB	525	0.7	99.7
2020	GB	464	0.2	99.9
2020	GB	562	0.1	100.0
2020	GB	543	0.0	100.0
2020	GB	542	0.0	100.0
2021	GB	522	67.8	67.8
2021	GB	561	29.4	97.2
2021	GB	562	1.9	99.1

2021	GB	525	0.5	99.5
2021	GB	464	0.4	100.0
2021	GB	542	0.0	100.0
2021	GB	543	0.0	100.0
2022	GB	522	61.2	61.2
2022	GB	561	37.2	98.4
2022	GB	464	0.8	99.3
2022	GB	562	0.7	99.9
2022	GB	525	0.1	100.0
2022	GB	543	0.0	100.0
2022	GB	542	0.0	100.0
2023	GB	522	80.5	80.5
2023	GB	561	18.6	99.1
2023	GB	464	0.9	100.0
2023	GB	562	0.0	100.0
2023	GB	525	0.0	100.0
2023	GB	543	0.0	100.0
2023	GB	542	0.0	100.0
2019	SNE	539	74.4	74.4
2019	SNE	537	11.7	86.0
2019	SNE	613	6.8	92.8
2019	SNE	612	4.2	97.0
2019	SNE	611	2.7	99.6
2019	SNE	614	0.3	99.9
2019	SNE	538	0.1	100.0
2019	SNE	615	0.0	100.0
2019	SNE	534	0.0	100.0
2019	SNE	616	0.0	100.0
2019	SNE	622	0.0	100.0
2019	SNE	533	0.0	100.0
2019	SNE	621	0.0	100.0
2020	SNE	539	61.4	61.4
2020	SNE	613	21.1	82.5
2020	SNE	537	12.9	95.3
2020	SNE	611	2.1	97.4
2020	SNE	612	1.2	98.6
2020	SNE	615	0.5	99.2
2020	SNE	622	0.5	99.7
2020	SNE	538	0.3	100.0
2020	SNE	533	0.0	100.0
2020	SNE	534	0.0	100.0
2020	SNE	616	0.0	100.0
2020	SNE	614	0.0	100.0

2020	SNE	621	0.0	100.0
2021	SNE	539	55.9	55.9
2021	SNE	613	15.0	70.9
2021	SNE	537	14.7	85.5
2021	SNE	611	7.0	92.5
2021	SNE	612	6.9	99.4
2021	SNE	614	0.6	100.0
2021	SNE	538	0.0	100.0
2021	SNE	615	0.0	100.0
2021	SNE	534	0.0	100.0
2021	SNE	616	0.0	100.0
2021	SNE	622	0.0	100.0
2021	SNE	533	0.0	100.0
2021	SNE	621	0.0	100.0
2022	SNE	539	55.5	55.5
2022	SNE	537	17.8	73.4
2022	SNE	611	14.9	88.3
2022	SNE	613	7.4	95.7
2022	SNE	612	3.8	99.5
2022	SNE	538	0.5	100.0
2022	SNE	615	0.0	100.0
2022	SNE	534	0.0	100.0
2022	SNE	616	0.0	100.0
2022	SNE	622	0.0	100.0
2022	SNE	614	0.0	100.0
2022	SNE	533	0.0	100.0
2022	SNE	621	0.0	100.0
2023	SNE	539	66.3	66.3
2023	SNE	537	11.7	78.0
2023	SNE	613	9.1	87.2
2023	SNE	611	7.3	94.5
2023	SNE	612	3.6	98.1
2023	SNE	538	1.9	100.0
2023	SNE	615	0.0	100.0
2023	SNE	534	0.0	100.0
2023	SNE	616	0.0	100.0
2023	SNE	622	0.0	100.0
2023	SNE	614	0.0	100.0
2023	SNE	533	0.0	100.0
2023	SNE	621	0.0	100.0
2019	WGOM	521	50.6	50.6
2019	WGOM	514	24.6	75.2
2019	WGOM	513	14.9	90.2

2019	WGOM	515	9.8	100.0
2019	WGOM	526	0.0	100.0
2019	WGOM	541	0.0	100.0
2020	WGOM	521	51.1	51.1
2020	WGOM	514	26.2	77.3
2020	WGOM	515	11.8	89.1
2020	WGOM	513	10.7	99.8
2020	WGOM	526	0.2	100.0
2020	WGOM	541	0.0	100.0
2021	WGOM	521	55.3	55.3
2021	WGOM	514	22.8	78.1
2021	WGOM	513	12.6	90.7
2021	WGOM	515	9.3	100.0
2021	WGOM	526	0.0	100.0
2021	WGOM	541	0.0	100.0
2022	WGOM	514	39.7	39.7
2022	WGOM	513	27.7	67.4
2022	WGOM	521	22.1	89.5
2022	WGOM	515	10.5	100.0
2022	WGOM	526	0.0	100.0
2022	WGOM	541	0.0	100.0
2023	WGOM	521	47.5	47.5
2023	WGOM	514	32.0	79.5
2023	WGOM	513	14.1	93.6
2023	WGOM	515	6.4	100.0
2023	WGOM	526	0.0	100.0
2023	WGOM	541	0.0	100.0

Percent contribution of common pool catches annually from FY2019-2023 by statistical area, for each cod stock.

FY	STOCK_ID	AREA	PERC_TOT	SUM_TOT
2019	EGOM	512	100.0	100.0
2019	EGOM	465	0.0	100.0
2019	EGOM	511	0.0	100.0
2019	EGOM	467	0.0	100.0
2020	EGOM	512	100.0	100.0
2020	EGOM	465	0.0	100.0
2020	EGOM	511	0.0	100.0
2020	EGOM	467	0.0	100.0

2021	EGOM	512	100.0	100.0
2021	EGOM	465	0.0	100.0
2021	EGOM	511	0.0	100.0
2021	EGOM	467	0.0	100.0
2022	EGOM	512	77.1	77.1
2022	EGOM	511	22.9	100.0
2022	EGOM	465	0.0	100.0
2022	EGOM	467	0.0	100.0
2023	EGOM	512	98.9	98.9
2023	EGOM	511	1.2	100.0
2023	EGOM	465	0.0	100.0
2023	EGOM	467	0.0	100.0
2019	GB	522	0.0	0.0
2019	GB	525	0.0	0.0
2019	GB	543	0.0	0.0
2019	GB	464	0.0	0.0
2019	GB	561	0.0	0.0
2019	GB	542	0.0	0.0
2019	GB	562	0.0	0.0
2020	GB	522	0.0	0.0
2020	GB	525	0.0	0.0
2020	GB	543	0.0	0.0
2020	GB	464	0.0	0.0
2020	GB	561	0.0	0.0
2020	GB	542	0.0	0.0
2020	GB	562	0.0	0.0
2021	GB	522	0.0	0.0
2021	GB	525	0.0	0.0
2021	GB	543	0.0	0.0
2021	GB	464	0.0	0.0
2021	GB	561	0.0	0.0
2021	GB	542	0.0	0.0
2021	GB	562	0.0	0.0
2022	GB	522	0.0	0.0
2022	GB	525	0.0	0.0
2022	GB	543	0.0	0.0
2022	GB	464	0.0	0.0
2022	GB	561	0.0	0.0
2022	GB	542	0.0	0.0
2022	GB	562	0.0	0.0
2023	GB	561	100.0	100.0
2023	GB	522	0.0	100.0
2023	GB	525	0.0	100.0

2023	GB	543	0.0	100.0
2023	GB	464	0.0	100.0
2023	GB	542	0.0	100.0
2023	GB	562	0.0	100.0
2019	SNE	539	49.4	49.4
2019	SNE	613	19.1	68.4
2019	SNE	612	13.2	81.6
2019	SNE	537	10.3	91.8
2019	SNE	611	8.2	100.0
2019	SNE	615	0.0	100.0
2019	SNE	534	0.0	100.0
2019	SNE	616	0.0	100.0
2019	SNE	538	0.0	100.0
2019	SNE	622	0.0	100.0
2019	SNE	614	0.0	100.0
2019	SNE	533	0.0	100.0
2019	SNE	621	0.0	100.0
2020	SNE	613	44.3	44.3
2020	SNE	539	35.2	79.5
2020	SNE	537	11.5	91.0
2020	SNE	611	4.2	95.2
2020	SNE	612	2.8	98.0
2020	SNE	615	1.3	99.3
2020	SNE	538	0.8	100.0
2020	SNE	534	0.0	100.0
2020	SNE	616	0.0	100.0
2020	SNE	622	0.0	100.0
2020	SNE	614	0.0	100.0
2020	SNE	533	0.0	100.0
2020	SNE	621	0.0	100.0
2021	SNE	539	40.0	40.0
2021	SNE	613	23.2	63.2
2021	SNE	537	13.1	76.3
2021	SNE	612	11.5	87.8
2021	SNE	611	11.3	99.0
2021	SNE	614	1.0	100.0
2021	SNE	615	0.0	100.0
2021	SNE	534	0.0	100.0
2021	SNE	616	0.0	100.0
2021	SNE	538	0.0	100.0
2021	SNE	622	0.0	100.0
2021	SNE	533	0.0	100.0
2021	SNE	621	0.0	100.0

2022	SNE	539	58.8	58.8
2022	SNE	611	17.9	76.6
2022	SNE	613	10.6	87.2
2022	SNE	537	7.4	94.6
2022	SNE	612	5.4	100.0
2022	SNE	615	0.0	100.0
2022	SNE	534	0.0	100.0
2022	SNE	616	0.0	100.0
2022	SNE	538	0.0	100.0
2022	SNE	622	0.0	100.0
2022	SNE	614	0.0	100.0
2022	SNE	533	0.0	100.0
2022	SNE	621	0.0	100.0
2023	SNE	539	70.9	70.9
2023	SNE	613	10.3	81.2
2023	SNE	611	8.7	89.8
2023	SNE	612	4.2	94.0
2023	SNE	537	3.7	97.7
2023	SNE	538	2.3	100.0
2023	SNE	615	0.0	100.0
2023	SNE	534	0.0	100.0
2023	SNE	616	0.0	100.0
2023	SNE	622	0.0	100.0
2023	SNE	614	0.0	100.0
2023	SNE	533	0.0	100.0
2023	SNE	621	0.0	100.0
2019	WGOM	514	54.6	54.6
2019	WGOM	513	41.1	95.7
2019	WGOM	521	4.3	100.0
2019	WGOM	526	0.0	100.0
2019	WGOM	541	0.0	100.0
2019	WGOM	515	0.0	100.0
2020	WGOM	514	58.9	58.9
2020	WGOM	521	20.5	79.4
2020	WGOM	513	18.5	97.9
2020	WGOM	515	2.1	100.0
2020	WGOM	526	0.0	100.0
2020	WGOM	541	0.0	100.0
2021	WGOM	514	78.9	78.9
2021	WGOM	521	20.5	99.3
2021	WGOM	513	0.7	100.0
2021	WGOM	526	0.0	100.0
2021	WGOM	541	0.0	100.0

2021	WGOM	515	0.0	100.0
2022	WGOM	514	66.7	66.7
2022	WGOM	513	15.0	81.7
2022	WGOM	521	11.6	93.3
2022	WGOM	515	6.7	100.0
2022	WGOM	526	0.0	100.0
2022	WGOM	541	0.0	100.0
2023	WGOM	514	62.4	62.4
2023	WGOM	515	14.9	77.4
2023	WGOM	521	12.8	90.1
2023	WGOM	513	9.9	100.0
2023	WGOM	526	0.0	100.0
2023	WGOM	541	0.0	100.0

Percent contribution of sector catches annually from FY2019-2023 by statistical area, for each cod stock.

FY	STOCK_ID	AREA	PERC_TOT	SUM_TOT
2019	EGOM	512	83.8	83.8
2019	EGOM	465	9.6	93.3
2019	EGOM	511	6.7	100.0
2019	EGOM	467	0.0	100.0
2020	EGOM	512	84.8	84.8
2020	EGOM	465	14.8	99.6
2020	EGOM	511	0.4	100.0
2020	EGOM	467	0.0	100.0
2021	EGOM	512	98.0	98.0
2021	EGOM	465	1.4	99.3
2021	EGOM	511	0.7	100.0
2021	EGOM	467	0.0	100.0
2022	EGOM	512	91.4	91.4
2022	EGOM	465	6.3	97.6
2022	EGOM	511	2.4	100.0
2022	EGOM	467	0.0	100.0
2023	EGOM	512	77.0	77.0
2023	EGOM	465	18.5	95.4
2023	EGOM	511	4.6	100.0
2023	EGOM	467	0.0	100.0
2019	GB	522	72.1	72.1
2019	GB	561	26.3	98.4
2019	GB	562	1.3	99.7
2019	GB	525	0.2	99.9

2019	GB	464	0.1	100.0
2019	GB	543	0.0	100.0
2019	GB	542	0.0	100.0
2020	GB	522	67.3	67.3
2020	GB	561	31.8	99.0
2020	GB	525	0.7	99.7
2020	GB	464	0.2	99.9
2020	GB	562	0.1	100.0
2020	GB	543	0.0	100.0
2020	GB	542	0.0	100.0
2021	GB	522	67.8	67.8
2021	GB	561	29.4	97.2
2021	GB	562	1.9	99.1
2021	GB	525	0.5	99.5
2021	GB	464	0.4	100.0
2021	GB	542	0.0	100.0
2021	GB	543	0.0	100.0
2022	GB	522	61.2	61.2
2022	GB	561	37.2	98.4
2022	GB	464	0.8	99.3
2022	GB	562	0.7	99.9
2022	GB	525	0.1	100.0
2022	GB	543	0.0	100.0
2022	GB	542	0.0	100.0
2023	GB	522	80.7	80.7
2023	GB	561	18.4	99.1
2023	GB	464	0.9	100.0
2023	GB	562	0.0	100.0
2023	GB	525	0.0	100.0
2023	GB	543	0.0	100.0
2023	GB	542	0.0	100.0
2019	SNE	539	85.7	85.7
2019	SNE	537	12.3	98.0
2019	SNE	613	1.2	99.2
2019	SNE	614	0.4	99.6
2019	SNE	611	0.2	99.8
2019	SNE	612	0.1	99.9
2019	SNE	538	0.1	100.0
2019	SNE	615	0.0	100.0
2019	SNE	534	0.0	100.0
2019	SNE	616	0.0	100.0
2019	SNE	622	0.0	100.0
2019	SNE	533	0.0	100.0

2019	SNE	621	0.0	100.0
2020	SNE	539	81.6	81.6
2020	SNE	537	13.9	95.5
2020	SNE	613	3.2	98.7
2020	SNE	622	0.9	99.6
2020	SNE	611	0.4	100.0
2020	SNE	533	0.0	100.0
2020	SNE	615	0.0	100.0
2020	SNE	534	0.0	100.0
2020	SNE	616	0.0	100.0
2020	SNE	538	0.0	100.0
2020	SNE	614	0.0	100.0
2020	SNE	612	0.0	100.0
2020	SNE	621	0.0	100.0
2021	SNE	539	79.6	79.6
2021	SNE	537	17.0	96.7
2021	SNE	613	2.7	99.4
2021	SNE	611	0.6	100.0
2021	SNE	538	0.0	100.0
2021	SNE	615	0.0	100.0
2021	SNE	534	0.0	100.0
2021	SNE	616	0.0	100.0
2021	SNE	622	0.0	100.0
2021	SNE	614	0.0	100.0
2021	SNE	533	0.0	100.0
2021	SNE	612	0.0	100.0
2021	SNE	621	0.0	100.0
2022	SNE	539	47.9	47.9
2022	SNE	537	42.4	90.4
2022	SNE	611	7.9	98.3
2022	SNE	538	1.7	100.0
2022	SNE	615	0.0	100.0
2022	SNE	534	0.0	100.0
2022	SNE	616	0.0	100.0
2022	SNE	622	0.0	100.0
2022	SNE	614	0.0	100.0
2022	SNE	533	0.0	100.0
2022	SNE	612	0.0	100.0
2022	SNE	621	0.0	100.0
2022	SNE	613	0.0	100.0
2023	SNE	537	56.5	56.5
2023	SNE	539	40.7	97.2
2023	SNE	613	2.8	100.0

2023	SNE	611	0.0	100.0
2023	SNE	615	0.0	100.0
2023	SNE	534	0.0	100.0
2023	SNE	616	0.0	100.0
2023	SNE	538	0.0	100.0
2023	SNE	622	0.0	100.0
2023	SNE	614	0.0	100.0
2023	SNE	533	0.0	100.0
2023	SNE	612	0.0	100.0
2023	SNE	621	0.0	100.0
2019	WGOM	521	51.0	51.0
2019	WGOM	514	24.4	75.4
2019	WGOM	513	14.7	90.1
2019	WGOM	515	9.9	100.0
2019	WGOM	526	0.0	100.0
2019	WGOM	541	0.0	100.0
2020	WGOM	521	51.3	51.3
2020	WGOM	514	26.0	77.3
2020	WGOM	515	11.9	89.1
2020	WGOM	513	10.7	99.8
2020	WGOM	526	0.2	100.0
2020	WGOM	541	0.0	100.0
2021	WGOM	521	55.6	55.6
2021	WGOM	514	22.3	77.9
2021	WGOM	513	12.7	90.6
2021	WGOM	515	9.4	100.0
2021	WGOM	526	0.0	100.0
2021	WGOM	541	0.0	100.0
2022	WGOM	514	38.9	38.9
2022	WGOM	513	28.0	67.0
2022	WGOM	521	22.4	89.4
2022	WGOM	515	10.6	100.0
2022	WGOM	526	0.0	100.0
2022	WGOM	541	0.0	100.0
2023	WGOM	521	48.4	48.4
2023	WGOM	514	31.2	79.6
2023	WGOM	513	14.2	93.8
2023	WGOM	515	6.2	100.0
2023	WGOM	526	0.0	100.0
2023	WGOM	541	0.0	100.0

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Rick Bellavance, *Chair* | Cate O'Keefe, PhD, *Executive Director*

MEMORANDUM

DATE: October 24, 2024

TO: Groundfish Committee

FROM: Groundfish Plan Development Team

SUBJECT: SNE cod recreational sub-ACL and AMs

The Groundfish Plan Development Team (PDT) met as a sub-group on October 16, 2024, and as a whole on October 23, 2024, to discuss analysis to support development of Framework 69 cod measures for Phase 1 of the Atlantic Cod Management Transition Plan. This memorandum focuses on Committee tasking to develop a recreational sub-ACL and accountability measures (AMs) for Southern New England (SNE) cod.

Background

At their September 11, 2024 meeting, the Groundfish Committee passed the following motion:

> *The Committee recommends to the Council to create a recreational sub-ACL for SNE cod, using recent PDT analysis of recreational/commercial catches for most recent ten years, and appropriate accountability measures.*

The rationale was that, following the Committee and Council development of the initial cod management transition plan, the outcome of the management track assessment and SSC recommendations for SNE cod became available. The result of these is a very low FY2025 ABC for SNE cod of 22 mt. There are great concerns about maintaining the catch target approach that has been used for the "old GB cod" stock. Without a recreational sub-ACL, if the ACL is exceeded, the commercial fishery would face accountability measures (pound-for-pound payback) even if the ACL overage is due to recreational fishery.

SNE cod OFL and ABC recommendations from the SSC

Fishing Year	OFL (mt)	ABC (mt)
2025	29	22
2026	47	36
2027	65	36

1. SNE cod recreational sub-ACL

The PDT initially discussed establishing a SNE cod recreational sub-ACL following a similar method as Western Gulf of Maine (WGOM) cod in using a recent percentage split in catch between the commercial and recreational groundfish fisheries. However, given high uncertainty and inter-annual variability in recreational catch estimates for SNE cod, the PDT offers a different approach for determining the SNE cod recreational sub-ACL that would focus on first determining an amount to be set aside for the commercial fisheries (including the commercial groundfish fishery and state and other commercial sub-components). The commercial component catch is more certain and consistent. The PDT recommends using the most recent five years.

Total commercial catches of SNE cod across the groundfish fishery, other sub-component fisheries, and state sub-component fisheries from FY2019-2023 have averaged ~10 mt. Commercial catches of SNE cod have remained consistent over the five-year period, with slight declines in more recent years.

Table 1- SNE cod commercial catch (mt) over FY2019-2023.

Fishing Year	Commercial Groundfish Fishery Catch (mt)	Other Commercial Sub-components Catch (mt)	State Commercial Sub-components Catch (mt)	Total Commercial Catch (mt)
2019	4.6	2.5	3.2	10.3
2020	5.7	1.6	5.8	13.1
2021	2.3	2.2	4	8.4
2022	3.7	2.4	3.4	9.4
2023	4.8	1.5	1.9	8.1
Average	4.2	1.9	3.8	9.9

The Committee could consider whether reductions in catch would be expected from any of the commercial fishery components. However, given these low catch amounts in recent years of 4.2 mt in the commercial groundfish fishery, 1.9 mt in other commercial fisheries, and 3.8 mt in state commercial fisheries, it is not clear if it is reasonable to expect further reductions or if these fisheries are already operating at bycatch levels for cod.

To determine the recreational sub-ACL, the ABC would be divided into a commercial sub-ABC and a recreational sub-ABC, with the commercial sub-ABC sufficient to cover the expected catch for the commercial groundfish fishery (plus the management uncertainty buffer) and the state and other sub-components. The recreational sub-ABC would have a management buffer applied to calculate the recreational sub-ACL.

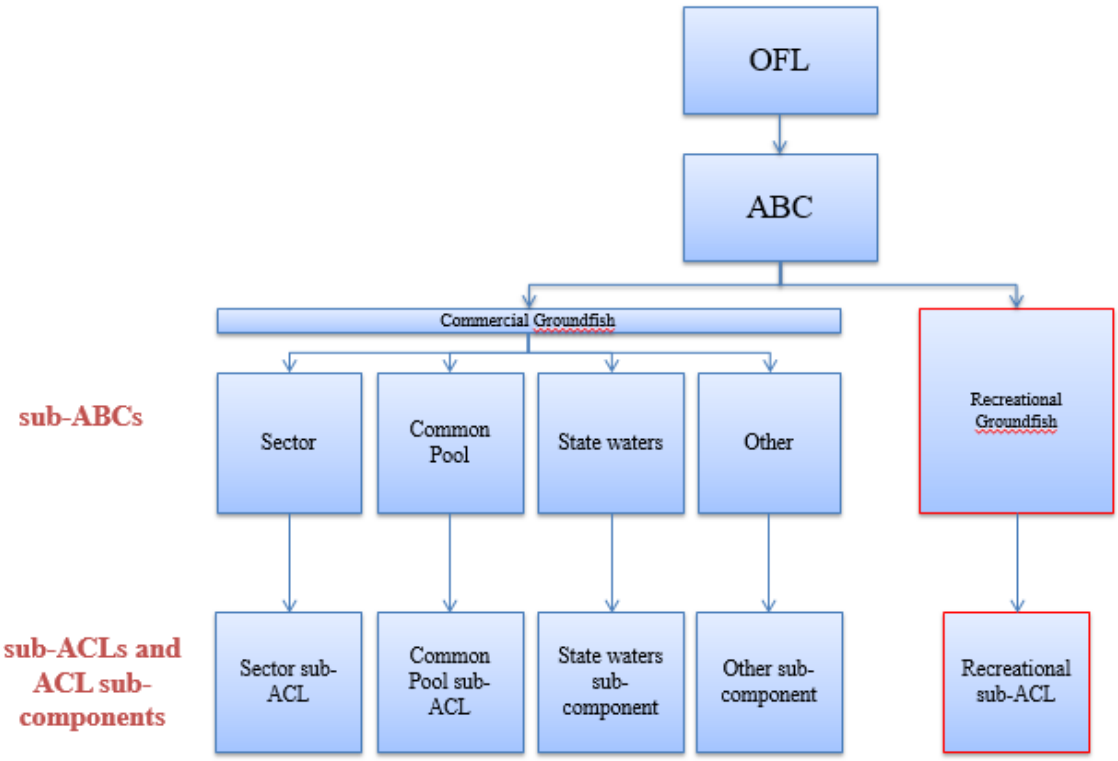

Table 2- Possible SNE cod sub-ABCs, sub-ACLs, and sub-components for FY2025.

ABC	22 mt			
Sub-ABC	Commercial			Recreational
	10.1 mt (46% of ABC)			11.9 mt (54% of ABC)
	Commercial Groundfish	State Waters	Other	
	4.4 mt	1.9	3.8	
Management Uncertainty Buffer	5%	0%	0%	7%
Sub-ACL/ sub-component	4.2 mt	1.9 mt	3.8 mt	11 mt

For comparison, the PDT provides the split between recreational and commercial catch (by weight) over the same most recent five-year period.

Table 3- SNE cod recreational catch, commercial catch, and recreational proportion of catch (2024 Assessment), using similar method for recreational/commercial allocation as WGOM.

Year	Recreational Catch (mt)	Commercial Catch (mt)	Recreational Proportion
2019	244	14	0.946
2020	202	13	0.940
2021	217	10	0.956
2022	126	16	0.887
2023	263	16	0.943
Average	210.4	13.8	0.934

Under a FY2025 ABC of 22mt using the resulting percentage in the table above for the recreational sub-ACL, this split would put the total commercial fishery catch amount (including commercial groundfish fishery, and state and other commercial sub-components) at less than 1.5mt.

The PDT emphasizes that whichever approach is taken to determine the SNE cod recreational sub-ACL should be considered temporary, as it is anticipated that MRIP estimates will be revised in the near future and the Council will be revisiting recreational/commercial allocations. Similar to the scallop sub-ACL for SNE/MA yellowtail flounder, it may be appropriate to reassess the percentage split between commercial and recreational if the total ABC for SNE changes, to ensure that sufficient quota is being set aside for the commercial fishery, without unnecessarily restricting the recreational fishery.

2. Accountability measures

The PDT discussed one approach for the AMs for a SNE cod recreational sub-ACL would be to follow what is done for WGOM (formerly GOM) cod and GOM haddock with reactive and proactive AMs.

Reactive AMs

- If catches exceed the sub-ACL, NMFS determines the measures necessary to prevent exceeding the sub-ACL in future years following consultation with the Council
- Final measures are to be published no later than January.
- The three-year average of recreational harvest is compared to the three-year average of the recreational sub-ACL and if necessary, AMs are to be implemented in the year immediately following.
- The recreational AM is either/or adjustments to season, adjustments to minimum size, or adjustments to bag limits.
- Separate AMs can be determined for the private boat and party/charter components of the recreational fishery – that is, the AMs may be different for these two components.

Proactive AMs

- Can be adjusted by the Regional Administrator to ensure the recreational fishery will achieve, but not exceed, its sub-ACL.
- Changes are typically made prior to the start of the fishing year.
- The Regional Administrator consults with the Council, or the Council's designee, and tells the Council, or its designee, what recreational measures are under consideration for the upcoming fishing year.
- If time allows, the Council also provides the Recreational Advisory Panel an opportunity to meet and discuss the proposed management measures.
- These AMs require development in consultation with the Council, because the appropriate suite of measures (e.g., bag limit, minimum fish size, and season) depends on the sub-ACL specified.

3. Recreational measures

The PDT recommends that recreational measures for SNE cod be included in Framework 69. While recreational catch estimates under the new stock units are still under development, the "old GB cod" recreational catch estimates are a reasonable stand in for SNE cod as these catches occurred almost entirely in Southern New England. Given the magnitude of recent recreational catches relative to the FY2025 ABC of 22 mt, it is anticipated that recreational measures for FY2025 will be set at zero possession. There is high uncertainty as to how incidental encounter rates with cod might look like under a closure of the SNE recreational cod fishery. The PDT recognizes there will be large negative impacts for the recreational fishery operating in Southern New England.

Table 4- Recreational fishery catches for "old GB cod".

Fishing Year	*Federal Waters Recreational Catch*	*State Waters Recreational Catch*	*All Recreational Catch*
2019	88.9	11.0	99.9
2020	152.6	141.8	294.4
2021	191.8	44.2	236.0
2022	128.3	28.8	157.1
2023	206.9	81.3	288.2