LAGC IFQ Access Area Trip Counting Discussion Document v2

The Council has identified "LAGC IFQ access area trip counting" as a 2021 work priority for the Scallop FMP. The following describes how LAGC IFQ access area fishing is administered and relevant fishery data to inform initial discussion by the PDT, Advisory Panel, and Committee.

Overview

The LAGC IFQ access area possession limit is expected to be increased through Amendment 21 in FY2022 from 600 pounds to 800 pounds. During the 2021 work priorities discussion at the Council, concerns were raised around the current method used to track LAGC IFQ access area fishing because trips are counted equally regardless of how many pounds are landed. A higher possession limit means that there will be fewer access area trips allocated to the LAGC IFQ component. Council members suggested that the higher possession limit could increase the rate of trip utilization and that alternative methods for counting IFQ access area trips could help improve the precision of access area closures in terms of pounds landed as opposed to trips landed.

Administering Access Area Fishing for LAGC IFQ Component

The LAGC IFQ component is allocated a fleet-wide number of trips to available access areas at the start of a fishing year. The number of trips to each access area is calculated by dividing the available allocation in pounds by the LAGC IFQ trip limit. LAGC IFQ vessels can choose to fish quota on open trips or in access areas that have trips available but are not required to fish in access areas. GARFO monitors quota utilization by the LAGC IFQ component in-season in open and access areas, but determines when an access area should close for the LAGC IFQ based on the number of trips that have been taken.

Importantly, in-season catch accounting for LAGC IFQ access area fishing is based on the number of trips taken, regardless of how many pounds are landed per trip. To illustrate a concern raised by the Council, Vessel A and Vessel B both declare a trip in the MAAA. Vessel A lands 599 pounds and Vessel B lands 200 pounds. While only 799 pounds of the 1,200 pound potential landings (2 trips * 600-pound trip limit) are landed, both trips are counted equally against the total MAAA trip allocation to the LAGC IFQ component.

Challenges of Tracking Landings in Real-Time

One issue with tracking landings in real time is that dealers are required to report weekly, which can result in a one week or more lag in landings data. Allocating and administering access area fishing in terms of trips instead of pounds landed reduces the uncertainty around when an access area will be closed because the exact number of trips taken (and the exact number of trips remaining) are known at any given point in time from VMS declarations, whereas the exact number of pounds landed are not known until several weeks or more following a trip due to the lag in dealer reports. Tracking pounds in real time can be particularly challenging in derby conditions when the rate of harvest is elevated. A recent example of this is in the NGOM management area, where a relatively small common TAC was available to be fished in 200-pound increments and was caught in less than one month of fishing. Due to the difficulty in tracking landings in real-time, assumptions needed to be made of average landings per trip based on available dealer data (i.e., one week lag), which was applied to the total number of trips taken in real-time for the purposes of projecting when the area would close. This approach made it virtually impossible to close the NGOM exactly when the TAC was harvested, resulting in the NGOM TAC being both exceeded and underutilized each year in this time period.

Challenges with closing access areas to the LAGC IFQ component almost always coincide with derby fishing. Derby fishing in an access area is typically an indicator that catch rates and(or) meat yield is high and that it is economically viable for IFQ vessels to fish there compared to open bottom fishing. The elevated rate of harvest can be an indicator that vessels are able to catch the possession limit in less time than it takes in other areas of the resource. Considering these factors, it is most often the case that derby fishing in an access area means that trips are landing very close to the possession limit. This is expressed in Table 1, which shows the relative difference in total landings from an access area by the LAGC IFQ component relative to the landing's potential for that year (i.e., total number of trips allocated * the possession limit), with areas that were closed before the end of the fishing year shaded in gray. Assuming that an area being closed before the end of the fishing year is an indicator of favorable fishing conditions and(or) derby fishing (i.e., high catch rates), it is worth noting that realized landings have been very close to the potential landings in those scenarios (within 2.3% on average). The same data are shown in Table 2 in terms of actual landings relative to potential landings.

Accountability Measures

There are no accountability measures in place for access area fishing in the LAGC IFQ component. NMFS projects when the area will close based on the number of trips that have been declared in real-time. Due to the simplicity in tracking the number of trips, access area closures typically occur very close to the total number of trips that were allocated without exceeding that number. In a scenario where the number of LAGC IFQ trips to an access area does exceed the total number allocated, there are no payback measures. This is different than the NGOM, which has a pound-for-pound payback accountability measure in a scenario when the LAGC TAC is exceeded prior to NMFS closing the area to fishing. Pounds landed over the NGOM TAC are deducted from a future year's TAC. In recent years where the NGOM TAC has projected to have been caught approximately one month into the fishing year, the actual landings have been both underestimated and overestimated relative what was projected at the time of the closure.

Questions/Discussion Points

- What are alternative methods for tracking IFQ access area fishing?
    - Utility in using a hybrid approach (i.e., average landings (from dealer reports) * number of trips).
- LAGC IFQ vessels are exempt from the possession limit when fishing RSA compensation pounds and can also land additional pounds over possession limit when carrying an observer on board.
    - In a system where landings are tracked in pounds, how do we handle RSA compensation trips or trips with observers on board?
- Consider whether consistency in catch accounting across the board for the LAGC component makes sense. For example, should different mechanisms be used for administering IFQ access area fishing and the NGOM management area?
- Can transitioning to a different access area counting metric be handled administratively outside of a Council action?

PDT Input from May 20, 2021

- Accounting effort in terms of number of trips is preferred over tracking effort in terms of pounds landed. As shown in Table 1, the current system is resulting in harvest within 5% of an individual access area allocation. The PDT recommends continuing tracking LAGC IFQ access area effort in numbers of trips, and to consider a variation of the current approach to better capture realized landings per trip in access areas.
    - Develop a 'maximum average' approach for calculating landings per trip. This is a variation of the current approach to better capture actual landings per trip. Instead of assuming that each LAGC IFQ access area trip lands the full possession limit (i.e., currently 600 pounds), average pounds per access area trip could be analyzed, and the maximum landings per trip could be used as an assumption of landings per trip. This way, trip accounting is still based on a certain number of trips, but the assumption of scallops landed is more reflective of reality. This also ensures that closures occur before the total number of expected landings per access area are exceeded.
    - There is limited data available about landings per trip when vessels can land 800 or more pounds on the trip (only observed trips). The Council specifies the number of AA trips for the LAGC IFQ component in each action, and it is published as a regulation. The PDT would need to consider options to scale this approach to the new trip limit as part of FW34. This could be as simple as using a ratio. However, based on the data in Table 1, the realized harvest is generally within 5% of the poundage allocation using the current approach.
- NGOM management area was discussed as an example of the challenges of tracking effort in pounds landed. Due to a lag in dealer data and challenge in accurately projecting a closure when the rate of harvest is high, it has been impossible to precisely project when the NGOM will close without an overage or underage of the NGOM TAC. Consider consistency in catch accounting for LAGC IFQ access area fishing and the NGOM.
- The PDT was interested in learning the original rationale for allocating access area trips instead of pounds. FW16 (FY2004) to the Scallop FMP was the first action to set a number of trips that could be taken in access areas by any open access GC permit holder. The allotment of trips was equal to 2% of the overall TAC for each scallop access area. While specific rationale was not provided on the allotment of trips instead of pounds, all measures associated with allowing GC vessels to fish in access areas were intended to support enforcement efforts and to control mortality (i.e., requirement to have VMS, trip declaration requirement, 400-pound trip limit, observer requirement, consistent reporting requirements with limited access component).

Figure 1 – Distribution of LAGC IFQ access area trips by pounds landed from FY2015 to FY2020.

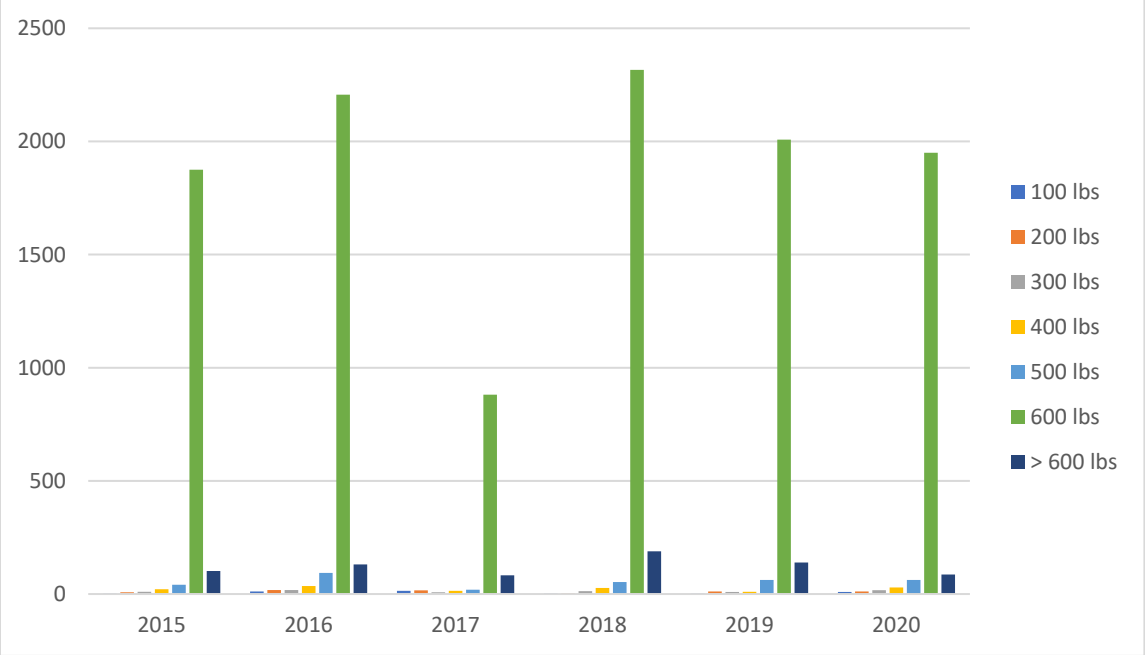

Table 1 – The relative difference (%) in landing potential and realized landings for access area trips from FY2015 to FY2020. Gray shading represents years where the access area was closed prior to the end of the fishing year. RSA compensation trips are excluded from data.

FY	CAI	MAAA	NLS	NLS-S	NLS-W
2015		-2.5%			
2016		-4.9%	0.3%		
2017		-15.9%	-0.4%		
2018	-1.7%	-2.0%		-4.2%	-2.3%
2019	-1.4%	-1.9%			-10.2%
2020	-5.1%	-3.3%	-5.1%		

*Table 2 – Potential (no. of trips * 600-pound trip limit) and actual pounds landed from access areas by the LAGC IFQ component, FY2015-FY2020. Gray shading represents years where the access area was closed prior to the end of the fishing year. RSA compensation trips excluded from data.*

	CAI			MAAA			NLS			NLS-S			NLS-W		
FY	Potential	Actual	Diff.	Potential	Actual	Diff.	Potential	Actual	Diff.	Potential	Actual	Diff.	Potential	Actual	Diff.
2015				1,228,200	1,197,337	**30,863**									
2016				1,220,400	1,160,358	**60,042**	287,400	288,354	**-954**						
2017				102,000	85,759	**16,241**	519,000	517,124	**1,876**						
2018	333,600	328,024	**5,576**	660,600	647,357	**13,243**				28,800	27,601	**1,199**	534,000	521,958	**12,042**
2019	316,800	312,268	**4,532**	1,004,400	985,228	**19,172**							23,400	21,021	**2,379**
2020	321,000	304,511	**16,489**	667,800	646,096	**21,704**	306,000	290,538	**15,462**						