

**ADVISORY PANEL**  
**Motions and Rationale**  
**April 2-5, 2019 - Anchorage, AK**

**C3     BSAI Cod Trawl**

The AP recommends the Council select Alternative 2, Option 1, Sub option 1.3 and Option 2, and Alternative 4 as its final preferred alternative.

*Motion passed 19-1*

*Rationale:*

- Since 2016 there has been an influx of six to seven catcher processors operating as motherships that are displacing historical processing participants and negatively impacting communities, while causing management and conservation problems.*
- Halibut rates have been alarmingly high as effort is shifted earlier in an already shortened BSAI trawl CV cod season.*
- Limiting catcher/processors (CPs) operating as motherships to the two historically dependent CPs with consistent activity in the BSAI trawl CV cod fishery before, and after Amendment 80, will help return the fishery to long-term stable processing patterns to benefit communities, shore side processors, and catcher vessels.*
- The analysis indicates the restrictive sub-options of Alternative 2 are responsive to the purpose and need. Limiting entry is a common tool used by the Council to address excess capacity issues in a fishery.*
- Sideboards under Alternative 3 are not necessary for the two qualifying historic mothership CPs and imposing them would likely delay implementation of the final rule, cause in-season management challenges, and does not reflect their participation in the fishery.*
- Alternative 3 does not encompass the two qualifying CP's participation in the BSAI trawl CV cod fishery because it doesn't include AI history. A sideboard punishes them for past stand downs to help reduce halibut bycatch and when Adak's plant faced regulatory uncertainty.*
- Sideboards would complicate management, requiring additional decisions about- whether they would apply to A/B seasons, how to account for incidental catch, and whether they be imposed as a hard or soft cap, all of which have unintended and detrimental management consequences.*
- A sideboard is not an allocation and would likely cause a race, leading to higher halibut bycatch by shifting effort earlier into the A season*
- There are expectations that the two qualifying vessels under Alternative 2 will not increase their historic levels of participation and have already been operating at full capacity; this was confirmed in public testimony and reflected by their consistent participation. The Council always has the right to impose sideboards at a later time should these offshore operations change.*
- Testimony and written comments from BSAI cod shoreplant and community representatives acknowledged that the two qualifying historic mothership CPs are not part of the recent problems the purpose and needs seeks to address.*

- *Limiting the entry of CPs operating as motherships will not result in a lack of processing capacity in the BSAI trawl CV cod fishery, which is provided through the numerous BSAI shoreplants, floaters, and the two historic mothership CPs as there was in the past.*
- *The catcher processors that would not be allowed to take cod mothership deliveries under this action would still be able to provide offshore processing in other fisheries and will still have access to their secure limited access privilege program allocations that have sustained their businesses in the past. The analysis shows two distinct patterns of participation/dependence.*
- *Catcher vessels will still have access to a variety of markets in the BSAI trawl CV cod fishery as they had in the past. A lack of BSAI processing capacity has not been identified as a problem the Council is seeking to address. However, some have emphasized that this action should not substitute a more comprehensive approach to issues within the BSAI cod trawl CV fishery that warrant further consideration of a catch share program.*
- *Aleutian Island (AI) stakeholders expressed concerns with any action that would allow additional motherships beyond the two historic mothership CPs. If additional motherships were to only take deliveries in the AI, BSAI onshore participation would still be eroded because the CV trawl allocation is BSAI wide and AI CV deliveries would reduce the aggregate sector allocation, which is counter to the purpose and need. A tight BS sideboard on any additional motherships would also have the effect of shifting more effort into the AI.*
- *Alternative 4 is meant to harmonize the existing AFA catcher processor restrictions on replacement vessels so that a replaced A80 catcher processor can't become a floater and process cod. The action will not impact floating processors and AFA true motherships which are vessels that don't engage in harvesting fish and only take deliveries.*
- *Action to control offshore cod deliveries is urgent and the public is advocating for implementation of the final rule for 2020.*