



# NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

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## Action Memo

**File Number:**HAL 17-029

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**Agenda Date**10/2/2017

**Agenda Number:**C1

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**Dan Hull, Chairman**  
**David Witherell, Executive Director**

**SUBJECT:**  
Charter Halibut Annual Permit Registration - Initial Review

**STAFF CONTACT:** Sarah Marrinan

**ACTION REQUIRED:**  
Consider Initial Review Draft of analysis and take action as necessary.

### BACKGROUND:

This Regulatory Impact Review (RIR) examines a proposal to implement an annual renewal process for the Charter Halibut Permit (CHP), a component of the Charter Halibut Limited Access Program. The information collected in an annual registration process would update and/or expand on the CHP data. This is an Initial Review draft which means the Council is still considering the possible alternatives to move forward, but will not take final action at this meeting (unless it chooses to no longer pursue any action).

Specifically, the Council is considering a requirement for CHP holders to submit certain information to National Marine Fisheries Service (NMFS) Restricted Access Management (RAM) Program on an annual basis in order to receive an up-to-date version of their permit, valid for that calendar year. Under the alternative, CHP holders would be required to submit: CHP number, CHP holder name, and CHP holder address. The intention of this action would be to provide more accurate information on CHP ownership (both for transferable and non-transferable CHP), in which a change may have unintentionally gone unreported to NMFS, as well as clarifying and accelerating the retirement of non-transferable CHPs that have had a change in ownership. The analysis lists benefits and drawbacks of this renewal process. The analysis also includes a suite of implementation details with feedback from representatives from NMFS RAM, Sustainable Fisheries, and Office of Law Enforcement. These topics could benefit from Council consideration and recommendations.

Under the first option for this alternative, the renewal would also require submission of the ownership structural information, updating what NMFS RAM received in 2011, during CHLAP implementation and what has been updated through transfers or volunteered information.

Options 2 and 3 would both require new information to be registered with NMFS RAM on CHP use. Option 2 would restrict use of CHPs to persons and/or vessels identified during the annual registration process, and Option 3 would restrict the use of the CHP to specific ports identified during the annual registration process. Both Options 2 and 3 contain a sub-option that would render the CHP invalid in the following year if used by a person, vessel, and/ or port not registered through the annual renewal process. The analysis of Option 2 and Option 3 highlights the need for the Council to further clarify the intent of action, possibility updating the purpose and need to reflect this intent.

An addendum is **posted separately** as a correction to Table 7 and Table 8 (page 39, Section 3.2.4).