

**Addressing the Ecological Implications of Consolidation and
Quota Accumulation
Under the Amendment 16 to the
Northeast Multispecies Fishery Management Plan**

White Paper

**Northwest Atlantic Marine Alliance
September 02, 2010**



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The Problem: Sectors have been implemented under Amendment 16 to achieve its stated biological objectives. Although not stated as an objective or goal of the Amendment, it is widely recognized that consolidation of the fleet is an aim of this process in part because of the assumption that consolidation will reduce the size of the fleet thus helping managers achieve the ecological goals and objectives of A16. However, with no provisions in place to control how that reduction might occur the door is wide open for fleet consolidation on a scale that may in fact undermine the very ecological objectives the Council was intending to achieve. No goals have been set or measures put in place for matching the fleet to the characteristics of the ecosystem and the distribution of groundfish populations and subpopulations. Why is this a problem? Because an optimal diversity in the fleet is essential to achieving the ecological goals of Amendment 16 in pursuit of achieving the goals of the Magnuson Stevens Act (MSA). **Without public discussion of ecological implications of quota consolidation, management outcomes may run counter to the stated intent of Catch Shares to conserve and recover fish stocks.**

The Magnuson Stevens Act, with its ten national standards, recognizes that fisheries management has biological, social, and economic implications, and the best management structures will have successfully addressed *all* these aspects. These National Standards were designed to work together recognizing the symbiotic relationship between the social, economic and ecological issues involved in fisheries management. Instead of focusing only on National Standard 1 to the exclusion of all others until it is achieved, all standards should be applied simultaneously, including among them the following that are especially relevant to consolidation:

- Standard 4: Allocations of fishing privileges must be fair and equitable, promote conservation, and limit excessive individual shares.
- Standard 5: Efficiency in the utilization of fishery resources should be considered but not as a sole purpose.
- Standard 8: Provide for the sustained participation of fishing communities; and minimize adverse economic impacts upon fishing communities.

Amendment 16 also has goals and objectives that acknowledge the importance of all three -- biological, social, and economic vitality -- and it makes the link between diversity in fisheries and diversity in the ecosystem. For example:

- Goal 2 (A16): Achieve economic efficiency, biological conservation, and diversity within the fishery.
- Goal 4 (A16): Minimize, to the extent practicable, adverse impacts on fishing communities and shoreside infrastructure.
- Objective 7 (A16): To the extent possible, maintain a diverse groundfish fishery, including different gear types, vessel sizes, geographic locations, and levels of participation.”

Yet in the design and implementation of sectors, the Council and NMFS have not adequately addressed the full range of MSA standards and Amendment 16 goals and objectives and consequently have undermined the ability to achieve the ecological benefits intended by these actions. It is the role of responsible management, not market economics, to shape the fleet in a way that is socially, ecologically, and economically resilient.

The short and long-term solutions: We urge the Council to modify the design of the current sector system to effectively address these weaknesses, and to include among the measures in Framework 45, a tightly intermeshed suite of provisions that together will address consolidation in order to effectively shape the desired diversity of the groundfish fleet.

We are encouraged that the Council took the first step toward achieving this in June it passed the following motion regarding accumulation limits:

To direct the Groundfish PDT to use the following goals to shape its recommendations to the Council on measures relating to accumulation limits: 1) maintain inshore and offshore fleets; 2) to the extent possible, maintain a diverse groundfish fishery, including different gear types, vessel sizes, geographic locations, and levels of participation; 3) maintain a balance in the geographic distribution of permits to protect fishing communities and the infrastructure they provide and 4) prohibit any person or government entity from acquiring or controlling excessive access to the resource, through in order to prevent extraction of disproportionate economic rents from other permits holders.

With this directive, the Council is asking the PDT to consider one of a number of types of measures that might be effective in achieving the outcomes required by the Magnuson-Stevens Act and the goals of Amendment 16. The success of accumulation limits is likely to be greater when accompanied by other well-formed measures, such that all interact to guarantee the success of each other and to avoid loopholes that might exist with only one type of control. **We therefore strongly suggest that, in addition to a well designed mechanism to limit accumulation of quota, associated measures be established at the same time to ensure the diversity of groundfish and groundfishing.**

We have reviewed Catch Share/ITQ plans and evaluations from around the United States and the world. We'd be happy to share more details about this research with the Council. Based on our research, there are a number of provisions that have been widely proposed or adopted to make Catch Shares more effective in accomplishing their ecosystem goals. Properly regulated, Catch Shares can be successful in recovering and maintaining healthy fisheries and ecosystems in the long run if maintaining an economically healthy fleet and a diverse community of fishermen is achieved. We are compiling a catalog of such measures, which is available as a separate document. Some should be seriously considered for New England over the long term, but for now we believe four key interlinked measures will be rapidly effective in shaping consolidation that supports rather than eliminates diversity of the fleet, fisheries, and fish.

1. ***Leasing restrictions:*** There must be leasing restrictions to ensure fleet diversity, prevent excessive consolidation, and foster an affordable fishery. The Baseline Leasing Restrictions under the Days At Sea program accomplished these goals. The groundfish industry is accustomed to baseline leasing restrictions and the infrastructure to implement already exists. Baseline leasing restrictions ought to be considered as a tool to achieve both the socio-economic and biological goals of the Council.
2. ***Accumulation limits:*** There must be strict limits on the ability of a single individual, vessel, or corporation to accumulate quota. Generally such limits are imposed as a limit on percentage of the TAC for a year and/or on percentage of the sector's allotted quota. Experience has shown that, if the quota limit is placed on the vessel, there must be an accompanying limit on how many vessels an individual or corporation may have participating in the fishery.

3. ***Quota set asides:*** There are several kinds of quota set-asides that can be established to help Catch shares achieve their ecosystem and fleet objectives:
 - Set-asides for new entrants to ensure younger fishermen and their boats have an opportunity to enter the fishery.
 - Set-asides for owner/operators, crew and captains to help maintain reliability and dedication to stewardship and safe fishing standards as well as providing security.
 - Quota set aside for adaptive management to enable adjustments to new scientific information and thereby helps achieve ecosystem goals.
 - Conservation set-asides to reward ecologically sound fishing practices with additional quota (not to exceed accumulation limits).
 - Research set-asides are already options in the New England management system and should remain so.

4. ***Ownership restrictions:*** Restricting quota ownership to historically active participants in the fishery can further ensure that fish are available only to fishermen and not to non-fishing corporations or investors.

Further description and explanation of these four recommendations

It is widely claimed that management systems based on catch limits are better able to meet conservation goals than systems based on fishing effort regulation, but that has not been clearly demonstrated. One of the biggest challenges is that the biological success of a management system such as sectors is entirely dependent upon the accuracy of the science determining annual catch limits. This is not at all guaranteed, and is even unlikely if the scales of the science do not match the scales of the ecosystem and fish population and subpopulation distribution, as is the case in New England. In the absence of perfect science, having a diverse fleet fishing with diverse gear and sensibly dispersed in inshore and offshore areas will better adjust to unanticipated conditions of stocks discovered as new science becomes available.

There have already been adjustments in catch limits made in the face of uncertain science and the challenges presented by choke species to the economic success of groundfish sectors. This clearly demonstrates how catch shares can drive management away from multi-species and ecosystem based systems toward more intense single species management. It is not clear that the desired recovery of fish stocks and fishery ecosystems – the primary justification for catch share management – will occur.

If the goal is to recover and maintain a healthy fishery ecosystem and also healthy fishing communities, extra measures are needed. If tightly regulated, with appropriate scales of management and sufficiently restrictive measures to avoid consolidation into a small industrial fleet, the sector system will better meet the desired objectives for fishermen, communities, and ecosystems alike. A complex of such measures should be able to address the goals laid out in the June Council meeting. There should also be measures that add adaptability and that alleviate the absolute need for perfectly accurate science.

Leasing restrictions

- Baseline leasing restrictions under the Days At Sea program served many functions, which included:

1. Maintaining a diverse groundfish fishery in terms of vessel size, geographical locations, and levels of participation,
2. Maintaining a balance in the geographic distribution of permits to protect fishing communities and the infrastructure they provide; and,
3. Prohibiting any person or government entity from acquiring or controlling excessive access to the resource.

Under Baseline leasing restrictions a lessor may only lease DAS to another vessel that is within 10 percent of the baseline length overall (LOA) and within 20 percent of the baseline engine horsepower of the Lessor's vessel. Information pertaining to vessel baseline specifications can be found on NOAA Fisheries' NE Regional Webpage http://www.nero.noaa.gov/ro/doc/das_baseline.htm

Baseline leasing restrictions is a practical solution to achieve the stated goals. The fishing industry is accustomed to the rule and infrastructure already exists to enforce the rule. Baseline leasing restrictions is legislatively feasible and ought to be placed into framework 45.

- Owner/Operator incentives: While leasing is essential for flexible exchange of quota among fishermen in order to accommodate and account for bycatch, reasonable limits can be applied that prevent a quota holder from going into the business of leasing quota. For instance, controls or limits might be placed on both the acquisition and release of quota. The exact cap — either on the owner or leaser or both — would need to be designed to meet the need for fishing flexibility while restricting fishermen from unfairly profiting from absentee quota ownership.

Accumulation limits

Once it has been established how the quota will be dispersed among eligible entities, accumulation limits can be imposed to further restrict consolidation. Accumulation limits may be tied to individuals or entities eligible to own or lease quota; to vessels with associated quota; to vessel categories (e.g. size categories); and other categories such as geographic units.

Different regions of the US and world have adopted accumulation caps ranging from as low as 0.5 percent to as high as 35%. The higher caps not only fail to prevent consolidation, they could very easily encourage it, whether intentionally or unintentionally. The one ITQ that is consistently held up as a successful example of restricting consolidation and protecting communities is the Alaska halibut-sablefish fishery, and at 0.5-1.5% the accumulation caps are considerably lower than in most other Catch Share management systems. However in the British Columbia halibut fishery, a seemingly low cap of 1% of the TAC was placed on each licensed vessel, which limited the concentration of catch per vessel. But they did nothing to prevent a single party from holding multiple vessels, so it did not stop consolidation. Accumulation limits on the order of 1% seem to be an essential component of any Catch Share system that wants to avoid consolidation that preferentially eliminates small- and medium-scale shore based fisheries operations and excludes crew.

In general, accumulation limits prevent excessive accumulation of quota, which should inhibit consolidation into corporations with large holdings, which should in turn hold down the price of leasing quota. To strengthen this resolve, limits on quota accumulation may be accompanied by provisions to:

- Ensure restrictions on accumulation of fishing vessels,
- Ensure that quota holders be active fishermen, and
- Prevent perpetual leasing or open market trading of quota shares.

Quota Set-asides

In any of the Catch Share systems, there should be measures to prevent exclusivity and to protect all levels of or groups of fishermen. Some portion of the TAC or sector allocations could be reserved for crew and captains as has been strongly recommended by fishermen on the west coast. Some portion of quota might be reserved for communities, community fishing associations, and/or geographic areas – including both initial allocations and eligibility to acquire additional quota within limits. To encourage new active fishermen to enter the fishery and to maintain a diverse fleet in inshore areas, permit prices and quota leasing must remain affordable. Owner-operator requirements and community quotas help accomplish this. In addition, a portion of initial allocation could be set-aside for new entrants.

Not all set-asides need be implemented each year, but the option should be there. When set asides turn out to be unneeded, they can be dispersed among owner-operators toward the end of the fishing year.

New entry set-asides could be coupled with public permit as a partial solution to maintaining diversity in the fleet. However, permit banks alone will not guarantee this.

Community-based non-profit permit banks that buy permits from retiring fishermen and lease or sell them to new entrants or returning fishermen at reasonable cost provide another mechanism for keeping entry costs fairly low and help maintain community connections to the local fishery.

Accountability, transparency, and enforcement are all key to making any of these measures work the way they are intended to work. As examples have shown, it is important to pay attention to the ease of creating parent companies to get around some of these restrictions and to provide for oversight and investigation, all of which requires forethought and planning and financing. It is difficult to do this right, as we are already seeing during the early months of sector implementation. It is essential to enact a few strong and quickly enforceable measures to stem consolidation. Once it happens, it is too hard to un-do, because large amounts of financial and political capital become entrenched and difficult to re-distribute. Only when the train has been slowed down, can the time be taken to design a more long-lasting and ecologically effective set of rules that shapes the character of the fishing fleet.

Incentives that reward additional quota beyond initial allocations (but not beyond accumulation limits) might be considered for fishermen switching to more sustainable fishing practices such as reducing size of gear, scaling fishing effort to the discrete ecosystem, changing number of hooks or gillnets, using sensors on trawls, etc. This might be accomplished with quota held available in a conservation set aside. Such a set-aside might also be used to enable the flexibility to respond to new information or unanticipated changes in the fishery, there might be an adaptive management quota set-aside.

Ownership rules

One way to manage consolidation is to place enforceable qualifications and rules on eligibility to acquire quota in a way that will constrain consolidation. For example, quota should be restricted to active fishermen, which would eliminate absentee ownership or investment speculation. There might also be a requirement that quota go only to owners onboard, which would restrict

accumulation of large numbers of vessels by a single entity (although there are bookkeeping methods that can and have been known to get around this requirement). Once rules for quota acquisition are determined, transferability may be addressed – whether, how much, and to/from whom quota can be transferred. Options range from non-transferable to no restrictions on transfer of quota. In the British Columbia halibut fishery, for instance, there was a planned sequential move from *non-transferable* for two years, to temporary leasing with *term limits* and finally to *permanent* transferability (sales), at which time consolidation into larger corporations occurred.

Transferability of a species quota between fishermen in different management regions, for which allowable catch is determined independently, should not occur. In fact, there are arguments supported by emerging science that suggest that spatial management units should be significantly smaller than they currently are and should be based on areal distribution of subpopulations. To the extent that these areas are based on fish population structure, the transfer of quota between them would presumably be restricted. The spatial allocation and transferability of quota needs more careful consideration than it has so far received, as it is key to the ecological success of Catch Share management plans.

The next steps

As the Council deliberates accumulation limits along with other measures to reinforce their effectiveness, we are confident that they will remain focused on the urgency to achieve their own defined goals – maintaining or increasing fleet diversity, preventing excessive and exclusive access to the fishery resource, maintaining geographic balance in the fleet, and sustaining both inshore and offshore fleets.

We look forward to working with the Council as you move forward in this process.

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