



**ADVISORY PANEL**  
**Motions and Rationale**  
**Dec 3-5, 2025**

The Advisory Panel met Wednesday, December 3, through Friday, December 5, 2025, at the Egan Center in Anchorage, AK. The following members were present for all or part of the meetings:

Tiffany Agayar	Lauren Howard	Chance Miller
Tamara Briggie	James Johnson	Patrick O'Donnell
Eva Dawn Burk	<del>Maktuayaq</del>	Landry Price
Bernie Burkholder	<del>(Formerly Johnson, Melissa)</del>	Chelsae Radell (Co-Vice Chair)
Shannon Carroll (Chair)	<del>Kavanaugh, Julie</del>	Annika Saltman
Nels Evens	Rick Laitinen	Paul Wilkins
Gretar Gudmundsson	Craig Lowenberg	Susie Zagorski
	Heather Mann (Co-Vice Chair)	

**C1 Crab Arbitration Motion**

The AP recommends that the Council takes final action and selects Alternative 2, Options 1 – 3 and 5, and Alternative 3, Option 2 as the preferred alternatives.

For reference, the full June 2025 motion, and the selected PPAs (in bold) is copied below.

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Alternative 1: Status Quo Action

**Alternative 2: Changes to the regulations governing the arbitration process.**

*Options are not mutually exclusive.*

**Option 1. Remove the requirement that the arbitrator can only select a remedy proposed by one side. Allow the arbitrator to select an independent or compromise remedy based on the facts provided in the arbitration.**

**Option 2. Require a written report and rationale from the arbitrator to the parties to the arbitration. The report should largely mirror the written report submitted by the Contract Arbitrator to NMFS to avoid external costs.**

**Option 3. Remove the requirement for a market report.**

Option 4. Remove the arbitration option for non-performance after a contract has been established to define BSAI crab price, delivery, or other terms.

**Option 5: Streamline the information submitted to NMFS in the Annual Arbitration Organization Report and notifications by removing requirements for information**

**NMFS already has, information that has not changed, and any other information that is no longer necessary.**

**Alternative 3. IFQ and IPQ application withdrawal. IFQ and IPQ applications can be withdrawn after being accepted by NMFS at any time before BSAI crab rationalization species TACs are announced and within**

Option 1: 24 hours or

**Option 2: 48 hours after BSAI crab rationalization species TACs are announced.**

*Motion passed 13-6*

*Rationale in Support of Main Motion*

*Option 1:*

- *Removing LBO is important because the system is not working as intended. The risks associated with arbitration are causing processors to not process and delay investments in infrastructure, which is harming all participants in the fishery. Allowing the potential for an optimal decision by using all submitted information could more evenly mitigate increasing operational costs and respond to evolving circumstances in the fisheries.*
- *Removing LBO doesn't eliminate the price formula or regulations requiring that the contract arbitrator make a decision based on the historical distribution of first wholesale revenues between fishermen and processors. Processors are still required to establish a price that preserves the historical division of revenues in the fishery.*
- *It does not prevent the arbitrator from choosing either the harvester or processor proposal during arbitration just like status quo, but it allows discretion to select a different outcome as supported by the available information if the arbitrator sees fit.*
- *Moving to a traditional arbitration system allows the contract arbitrator to select an outcome using their judgment as to what is fair and optimal, considering all the facts.*

*Option 2:*

- *Support selection of Alternative 2 because it will allow all parties to understand and adapt to arbitration outcomes, rather than speculating on the arbitrator's rationale.*
- *Requiring the arbitrator to ensure that their decisions are reasoned, fair, and logical should be a minimum requirement for the process.*

*Option 3:*

- *Reduces costs with no downside.*

*Option 5:*

- *This seems widely supported, and analysis shows no negative impacts on harvesters, processors, or NMFS.*

*Alternative 3, option 2:*

- *Provides clarity and certainty that benefits all stakeholders, while also preventing arbitrary and uneven application of the rule.*
- *Would not create any new risks or management issues; it would only provide additional certainty and clarity.*

*Rationale in Opposition to Main Motion*

*Same as the rationale posted in support of the substitute motion (below).*

**C1 Crab Arbitration Substitute Motion**

The AP recommends that the Council takes no further action.

*Motion failed 17-2*

*Rationale in Opposition to Substitute Motion*

- *The substitute motion was not responsive to the concerns raised by processors and community representatives.*
- *The lack of arbitration proceedings, coupled with the declining number of active processors and their documented concerns regarding risk of arbitration, suggests that the current system is not working as intended.*

*Rationale in Support of Substitute Motion*

*Specific to Alternative 2*

- *These are not small changes being proposed, but rather a fundamental change to the intended design of the CR program.*
- *The arbitration program is not broken. There have been 2 arbitrations in the past 10 years. Both of those arbitrations were triggered by processors paying well below the price paid by other processors. Because of baseball-style arbitration, harvesters only asked the arbitrator for a price paid by the lowest payers. Access to the arbitration system is very difficult for harvesters. Because of their FCMA status, ICE is the only cooperative that can arbitrate.*
- *There have not been any arbitration events in the recent years of low crab TACs.*

- *As long as harvesters must ShareMatch with IPQ holders the arbitration system must remain in place as it is the only viable means by which harvesters can ensure that they are paid a fair price for their catch.*
- *Harvesters' agreement to the development of CR Program, which necessarily caused them to give up the right to sell their crab to the processor offering the highest price, was based on the maintenance of the historical division of revenues between harvesters and processors being enshrined in the CR Program. The changes proposed to the Arbitration System will undermine this bargain. Crab harvesters believe the Council should exercise restraint rather than make sweeping changes to address issues that have proven to be fleeting in nature.*
- *Taking no further action is responsive to some public testimony*
- *The ICE written comment letter supports this rationale and did a great job of detailing harvester's perspective on these issues.*
- *Arbitration is a safeguard for harvesters against bad actors. Without it, potential bad behavior is encouraged with no viable recourse by harvesters other than costly and lengthy civil litigation.*
- *Processors won a price arbitration against harvesters in 2010.*

#### **Option 1 - LBO**

- *Baseball-style arbitration is a fundamental element of the CR program. It was implemented to maintain the balance of power between harvesters and processors due to the issuance of IPQ and requirement to ShareMatch.*
- *Baseball-style arbitration keeps a lid on the arbitration system. The risk of losing is a powerful disincentive to arbitrate that would effectively be removed if the arbitrator can choose a compromise price. It is reasonable to assume that without "baseball" arbitration, there will be a significant increase in arbitration events and therefore increased costs. This was referenced in the analysis. Further, arbitrators expressed the reasonable assumption of increased costs of arbitrations, due to the fact they are paid by the hour rather than by the event. Also, the current structure drives participants to provide a reasonable offer at the onset of arbitration.*

#### **Option 2 - Written explanation of Arbitration Outcome**

- *The arbitration issues are not that complicated. If a processor offers a price that is well below what others pay, they may end up in arbitration.*
- *Requiring a written report and rationale will increase the cost of the arbitration program.*

#### **Option 4 - Remove Arb for Non-Performance**

- *Despite the fact that there has never been a performance arbitration, its presence acts as a deterrent to anyone who could otherwise fail to comply with the arbitrator's decision or the terms of a contract. This is an important protection for*

*both parties that should remain in place. Without it, a very expensive civil suit is the only recourse.*

### **Alternative 3**

- *Harvesters believe there is a lack of consensus amongst processors.*
- *The withdrawal of IPQ/IFQ applications could be used as a negotiation tactic.*
- *Even with clearly defined rules, Harvesters fear that this change could be a slippery slope. As it stands, harvesters and processors will often form a "Lengthy Season Agreement" which obligates processors to accept deliveries. It is a basic assumption of the CR Program that holders of IPQ are supposed to actually process the crab. Both harvesters and processors run the risk that a particular season may be unprofitable. The Council should consider that if IPQ holders can unconditionally withdraw applications how are harvesters to be protected? So any new rule must preserve the right to do Lengthy Season Agreements and the right to arbitrate.*

### **Purpose and Need**

- *The P&N statement details the changes being considered arose out of concerns regarding "high annual uncertainty, fishing closures, and low TACs". Since this action was initiated, biomass has rebounded, fisheries have reopened and TACs have increased. With biomass trends indicating a high probability of continued improvement, it seems inappropriate to make significant, sweeping changes to address temporary conditions.*

## **C2 Crab C Shares Motion**

The AP recommends Council take final action on the BSAI Crab C-Shares agenda item with both Alternative 2 and Alternative 3 as the final recommendation. Specifically, under Alternative 3, the AP recommends the BBR, BSS, EBT and WBT C-Share use caps be raised to 3.5%, while SMB and PIK C-Share use caps remain unchanged at 4%.

*Motion passed 19-0*

### **Rationale in Support of Motion**

- *Taking this action will increase flexibility and opportunities for new entrants and promote more economic stability – one of the key objectives of the CR program.*
- *Challenging times observed during, and after, the pandemic, low harvest levels and closed fisheries with fewer vessels and therefore crew positions, participating in the fisheries has had a chilling effect on new entrants.*
- *The market for c-shares is weak and demand is low (little to none).*

- *This action would more closely mirror the new regulations for maintaining c-shares and retains the requirement to be a participant in the CR Program fisheries to keep that tie with crab fisheries.*
- *It will provide an alternative outlet for a CR Program crewmember to achieve the 150-day threshold for commercial fishing experience. It may increase opportunities for active CR program fishermen by increasing flexibility around C share requirements and encouraging new entrants, relative to no action.*
- *It would be particularly advantageous when harvesting crewmember opportunities are reduced, or for crewmembers who have primarily had tendering employment opportunities and experience.*
- *Tendering experience has been a common way for CR Program fishermen to begin working on a crab vessel.*
- *Both Alternatives provide more avenues and opportunities for C share markets to stabilize, compared to the status quo. Selecting only one alternative or another will only provide limited relief and response to the P&N. So, both alternatives 2 and 3 are appropriate.*
- *Increased demand & prices could motivate and enable current C share QS holders to initiate the sale and transfer of their currently held QS, creating additional churn in the QS holder pool*
- *A 3.5% use cap was chosen for BBR, BSS, EBT and WBT to address potential concerns or provide a compromise for those who are concerned about excessive consolidation. While most participants believe the cap should be increased, unanimous consent was not reached on what the cap should be. Again, this is why I chose a compromised position.*
- *Alaska Bering Sea Crabbers' anonymous member's poll was fairly evenly distributed. About 2/3 of respondents wanted 0-5% increase, or alternatively, 2/3 wanted 5-10% increase.*
- *It is important to distinguish between the C-Share market and the ROFO program. Both markets have been stale for several years and are very different programs. However, they both indicate the level of interest by captains and crew to invest in the fishery is currently extremely low. ICE has administered the ROFO program at it's own cost for all stakeholders (not just ICE members) since the program's inception. The program still exists but has suspended in recent years due to no interested parties signing up for the program. It can be reinstated at any time.*
- *This motion is responsive to public testimony.*

#### **C4 GOA Groundfish Harvest Specs Motion #1**

The AP appreciates the exceptional work of Council and Agency staff in this unprecedented and abbreviated annual Gulf of Alaska Specifications process.

The AP recommends that the Council approve the Final 2026 and 2027 GOA Groundfish harvest specifications for OFLs and ABCs as recommended by the SSC, and the TACs as shown in the attached Table 1.

- The TACs for both GOA Pacific cod and pollock have been adjusted to account for the State Water Guideline Harvest Level Fisheries, including the recent change by the Board of Fish to increase the deduction from the WGOA ABC to 35% for the South Alaska Peninsula state cod fishery. The GOA Pacific cod adjustments are shown in Table 2 in the action memo.
- The AP recommends that the Council set the Final 2025 and 2026 Pacific halibut PSC limits, allowances, and apportionments in the GOA as shown in Tables 3-5 in the C4 Additional Tables for GOA Groundfish document on the eAgenda.

*Motion passed 19-0*

*Rationale in Support of Main Motion*

- *The AP noted appreciation for Council and Agency staff at all levels for their exceptional work in pivoting in this unprecedented situation. The quality of leadership during this time, the level of information made available to explain this nuanced process, and the readiness to answer any and all questions was appreciated.*
- *The AP adopted the same Table 1 for GOA Specifications as the AP passed in October, which are reflective of the best available scientific information that we have at this meeting with the following changes:*
  - *The AP adopted the SSC's single change to the Deepwater Flats complex ABC, including the SSC's recommendation of ABC equal to TAC. The SSC was able to review the harvest projection for this change since it had already been completed before the lapse in appropriations.*
  - *The AP also included the deduction from the WGOA ABC to 35% to account for the change from the Board of Fisheries action for the South Alaska Peninsula state cod fishery. Since 35% of the WGOA ABC TAC is now deducted for that state fishery (rather than 30%), the WGOA cod TAC is now less.*
- *The TACs included in the motion are responsive to the AP's task to use the best available science and long term trends to maximize the long term yield of the fisheries.*
- *AP members did not support including the raw 2025 survey results as they represent one data point and are further complicated by the change to a new stratified random GOA bottom trawl survey that sampled 17% fewer stations. Without further analysis and peer review, the raw survey data seems to show an across the board decline in deepwater species and increase in shallow water species, further confusing whether this is a signal from the stocks or a figment of survey design/dropped stations.*
- *AP members noted frustration that the GOA bottom trawl survey doesn't effectively sample deep water species, such as rockfish, that inhabit areas untrawlable by the*





#### **C4 GOA Groundfish Harvest Specs Motion #2**

The AP requests the Council explore whether there could be benefits from updating GOA pollock and cod 2026 harvest projections with 2025 survey information to be in effect for 2026.

*Motion passed 14-4*

##### *Rationale in Support of Motion*

- *While the motion maker noted that the specifications passed in the prior motion reflected the best scientific information available at this meeting, this motion is a request to explore the possibility of providing additional updated information that would continue through the normal process after the conclusion of this meeting. The intent is that the Council would be considering whether updated information from the 2025 surveys used in pollock and cod assessments, as well as updated catch information could be put in the existing stock models with existing apportionments, since the current model and apportionments represent the best scientific information available.*
- *Note that after the AP took action, staff indicated to the motion maker that the correct term for this request is an “operational assessment” not an updated harvest projection.*
- *This motion is responsive to written comment that the AP received, stakeholder concerns discussed in preparation for the meeting, and oral testimony that the SSC received. It was noted that the GOA stakeholders, including communities, have been struggling for the last three years, they remain the last unrationalized trawl fisheries, and that pollock and cod are the species that keep the lights on for processors to be able to accept deliveries from other smaller fisheries. Further, updates to the GOA cod ABC and TAC would benefit all GOA sectors.*
- *During staff presentations, AFSC stated that Dr Foy stated that it would be possible specifically to update harvest projections but that there would be tradeoffs in work that they would be able to complete for that species. The motion maker noted that they had discussions with numerous GOA pollock and cod stakeholders who understand and are still eager to get updated information.*
- *GOA POP was not included in this motion due to the response from inseason that there were likely to be larger issues with midseason adjustments, especially when the TAC would be expected to decrease, since cooperative quota permits would potentially already be issued.*
- *AP members noted the difference between adjusting TAC numbers for an Open Access fishery, pollock, versus adjusting numbers for Pacific cod, which is assigned to the Rockfish Program Catcher Vessel Sector cooperative permits before the opening of the fishery April 1, and questioned whether adjustments to these permits midyear is possible within the current NMFS RAM/Inseason Management structure. Despite these concerns, since the GOA RP CV cod allocation is so small, the motion maker did not feel it was necessary to drop cod at this stage since benefits would still be significant if it is possible.*
- *AP members noted support for the intent of the motion, which may provide increased opportunity for the harvesters, processors, and communities of the Gulf of Alaska. However, one AP member noted concern with the precedent of going outside of the established process for*

*groundfish specifications, but supported the motion based on the soft language for the Council to simply explore this idea further rather than offering a concrete recommendation to proceed.*

- *Concerns that we could also be in the same situation next year were also brought up under this agenda item, with the AP briefly discussing the need for contingency planning for all species in the GOA and BS so that fisheries aren't continuing to operate on old information. The AP expressed hope that the Agency and Council were working on contingency plans for the future.*
- *The AP also noted that the challenges this year are indicative of the importance as well as the need for the EO 14276 Restoring American Seafood Competitiveness.*

#### Rationale Against Motion

- *An AP member noted concern about potential ecosystem impacts due to a change since there would not be updated ecosystem data included since there wouldn't be an updated 2025 Ecosystem Status Report that would be factored in.*
- *Another AP member noted that potentially a mid-season reallocation of GOA cod would have unequal benefits between sectors since some vessels may already be finished with GOA cod for the year before a reallocation is implemented.*

#### **C5 BSAI Groundfish Harvest Specs**

The AP has reviewed the most recent reports and the best scientific information available for the 2026 and 2027 BSAI groundfish specifications setting process.

The AP recommends the Council approve the final 2026 and 2027 BSAI groundfish specifications for OFLs and ABCs as recommended by the SSC, and the TACs as shown in the attached Table 1. The BSAI Pacific cod and sablefish TACs have been adjusted for the respective State Water fisheries.

The AP recommends the Council approve the 2026 and 2027 Seasonal and Spatial Allowances of Atka Mackerel, ABC Reserves, and PSC limits and apportionments as assigned to their respective target fisheries as provided in Tables 3, 7, 8, 9, 10, and 11.

The AP recommends the Council approve the halibut discard mortality rates for 2026 and 2027 as shown in Table 12.

*Motion Passed 19-0*

#### Rationale in Support of Motion

- *The AP appreciates the effort by Council Staff and others to maintain clarity and adherence to federal process despite the lapse in appropriations since setting Final Specifications is essential to allow fishing to occur. The AP noted that the process remains robust and transparent as described in the Council's Groundfish Specs process document on the eAgenda, 2025 Catch reports show no overfishing is occurring and no major stock concerns have been flagged.*

- *It was made clear to the AP that the best scientific information available for setting BSAI Specs are the 2024 SAFE Report, 2025 ESR Preview, 2025 catch reports, and preliminary 2025 survey data.*
- *The AP incorporated the SSC's recommended OFLs and ABCs rolled over from 2025/2026 BSAI Specifications and accounted for mandatory reductions including state water fisheries GHL deductions (Pacific cod, sablefish GHL), statutory minimums for AI pollock, and sea lion protection measures.*
- *It was noted that the following adjustments to the 2026 ABCs and TACs were already approved through the normal, transparent process to set the 2025/2026 ABCs and TACs which were supported by the 2024 SAFE report and approved by the SSC, AP, and Council in December 2024. This includes:*
  - *EBS pollock 16% decrease*
  - *EBS Pacific cod 8% decrease*
  - *Atka mackerel 10% decrease*
  - *Balanced increases to Yellowfin sole, Northern rock sole, flathead sole.*
  - *Overall BSAI ABC decrease from 2025 to 2026 is approximately 400,000 mt.*
- *There were no additional adjustments made at this meeting and the BSAI TAC total balances to the required 2 million metric ton limit.*
- *The updated herring biomass estimate from ADFG is delayed, therefore the AP rolled over last year's Herring PSC limit as placeholder. The Council is expected to update before final specs are complete. In-season authority cannot update PSC after TAC is set so the timely update to herring at this Council meeting is critical.*
- *All other PSC allocations have been maintained and halibut DMRs remain as accepted in October.*
- *The AP highlighted the urgency of the Final 2026/2027 Specs being published in the Federal Register before current ones expire in mid-March to avoid disruptions to all federal fishery operations. The AP appreciates NMFS in-season for prioritizing timely publication.*

Table 3–Final 2026 and 2027 Seasonal and Spatial Allowances, Gear Shares, CDQ Reserve, Incidental Catch Allowance (ICA), and Amendment 80 Allocations of the BSAI Atka Mackerel TAC

Sector <sup>1</sup>	Season <sup>2,3,4</sup>	BS/EAI	CAI <sup>5</sup>	WAI <sup>5</sup>
TAC	Total	41,731	23,716	17,494
CDQ reserve	Total	4,465	2,538	1,872
	A	2,233	1,269	936
	Critical Habitat		761	562
	B	2,233	1,269	936
	Critical Habitat		761	562
non-CDQ TAC <sup>7</sup>	Total	37,266	21,178	15,622
ICA	Total	800	100	20
Jig <sup>6</sup>	Total	182		
BSAI trawl limited access	Total	3,628	2,108	
	A	1,814	1,054	
	Critical Habitat		632	
	B	1,814	1,054	
	Critical Habitat		632	
Amendment 80	Total	32,655	18,971	15,602
	A	16,328	9,485	7,801
	Critical Habitat		5,691	4,681
	B	16,328	9,485	7,801
	Critical Habitat		5,691	4,681

Note: Seasonal or sector apportionments may not be total precisely due to rounding.

<sup>1</sup>Section 679.20(a)(8)(ii) allocates the Atka mackerel TACs, after subtracting the CDQ reserves, ICAs, and the jig gear allocation, to the Amendment 80 and BSAI trawl limited access sectors. The allocation of the ITAC for Atka mackerel to the Amendment 80 and BSAI trawl limited access sectors is established in table 33 to 50 CFR part 679 and § 679.91. The CDQ reserve is 10.7 percent of the TAC for use by CDQ participants (see § 679.20(b)(1)(ii)(C)).

<sup>2</sup> Sections 679.20(a)(8)(ii)(A) and 679.22(a) establish temporal and spatial limitations for the Atka mackerel fishery.

<sup>3</sup> The seasonal allowances of Atka mackerel for the CDQ reserve, BSAI trawl limited access sector, and Amendment 80 sector are 50 percent in the A season and 50 percent in the B season.

<sup>4</sup> Section 679.23(e)(3) authorizes directed fishing for Atka mackerel with trawl gear during the A season from January 20 to June 10, and the B season from June 10 to December 31.

<sup>5</sup>Section 679.20(a)(8)(ii)(C)(1)(i) limits no more than 60 percent of the annual TACs in Areas 542 and 543 to be caught inside of Steller sea lion critical habitat; § 679.20(a)(8)(ii)(C)(1)(ii) equally divides the annual harvest limits between the A and B seasons as defined at § 679.23(e)(3); and § 679.20(a)(8)(ii)(C)(2) requires that the TAC in Area 543 shall be no more than 65 percent of ABC in Area 543.

<sup>6</sup>Sections 679.2 and 679.20(a)(8)(i) require that up to 2 percent of the Eastern Aleutian District and Bering Sea subarea TAC be allocated to jig gear after subtraction of the CDQ reserve and ICA. The proposed amount of this allocation is 0.5 percent. The jig gear allocation is not apportioned by season.

<sup>7</sup>The 2027 allocations for Atka mackerel between Amendment 80 cooperatives and the Amendment 80 limited access sector will not be known until eligible participants apply for participation in the program by November 1, 2026.

Table 7–Final 2026 and 2027 ABC Surplus, ABC Reserves, Community Development Quota (CDQ) ABC Reserves, and Amendment 80 ABC Reserves in the BSAI for Flathead Sole, Rock Sole, and Yellowfin Sole

Sector	Flathead sole	Rock sole	Yellowfin Sole
ABC	87,700	158,225	267,639
TAC	36,000	75,000	145,000
ABC surplus	51,700	83,225	122,639
ABC reserve	51,700	83,225	122,639
CDQ ABC reserve	5,532	8,905	13,122
Amendment 80 ABC reserve <sup>1</sup>	46,168	74,320	109,517

Note: Seasonal or sector apportionments may not total precisely due to rounding.

<sup>1</sup>The 2027 allocations between Amendment 80 cooperatives and the Amendment 80 limited access sector will not be known until eligible participants apply for participation in the program by the deadline of November 1, 2026.

Table 8–Final 2026 and 2027 Apportionment of Prohibited Species Catch Allowances to Non-Trawl Gear, the CDQ Program, Amendment 80, and the BSAI Trawl Limited Access Sectors

PSC species and area and zone <sup>1</sup>	Total PSC	Non-trawl PSC	CDQ PSQ reserve <sup>2</sup>	Trawl PSC remaining after CDQ PSQ	Amendment 80 sector <sup>3,4</sup>	BSAI trawl limited access sector	BSAI PSC limits not allocated to Amendment 80
Halibut mortality (mt) BSAI	3,079	710	315		1,309	745	
Herring (mt) BSAI	2,651						
Red king crab (animals) Zone 1	97,000		10,379	86,621	43,293	26,489	16,839
C. opilio (animals) COBLZ	12,850,000		1,374,950	11,475,050	5,639,987	3,688,081	2,146,982
C. bairdi crab (animals) Zone 1	980,000		104,860	875,140	368,521	411,228	95,390
C. bairdi crab (animals) Zone 2	2,970,000		317,790	2,652,210	627,778	1,241,500	782,932

Note: Seasonal or sector apportionments may not total precisely due to rounding.

<sup>1</sup>Refer to § 679.2 for definitions of areas and zones.

<sup>2</sup>The PSQ reserve for the CDQ Program for crab species is 10.7 percent of each crab PSC limit.

<sup>3</sup>The Amendment 80 program reduced apportionment of the trawl PSC limits for crab below the total PSC limit. These reductions are not apportioned to other gear types or sectors.

<sup>4</sup>Under Amendment 123 and implementing regulations (88 FR 82740, November 24, 2023), the halibut PSC limit for the Amendment 80 sector is determined annually based on the most recent halibut biomass estimates from the IPHC setline survey index and the NMFS AFSC Eastern Bering Sea shelf trawl survey index (§ 679.21(b)(1)(i)(A)-(C)). Since both survey indices are not yet available, NMFS is unable to calculate the Amendment 80 sector halibut PSC limit for the proposed 2026 and 2027 harvest specifications and therefore proposes a roll-over from last year's 2025 and 2026 harvest specifications of 1,309 mt. NMFS will update the final halibut PSC limit for the Amendment 80 sector, as well as the total halibut PSC limit for the BSAI, in the final 2026 and 2027 harvest specifications.

Table 9–Final 2026 and 2027 Herring and Red King Crab Savings Subarea Prohibited Species Catch Allowances for All Trawl Sectors

Fishery categories	Herring (mt) BSAI	Red king crab (animals) Zone 1
Yellowfin sole	153	
Rock sole/flathead sole/Alaska plaice/other flatfish <sup>1</sup>	77	
Greenland turbot/arrowtooth flounder/Kamchatka flounder/sablefish	8	
Rockfish	8	
Pacific cod	14	
Midwater trawl pollock	2,359	
Pollock/Atka mackerel/other species <sup>2 3</sup>	31	
2026 Red king crab savings subarea non-pelagic trawl gear <sup>4</sup>		24,250
Total trawl PSC	2,651	97,000

Note: Seasonal or sector apportionments may not total precisely due to rounding.

<sup>1</sup>“Other flatfish” for PSC monitoring includes all flatfish species, except for halibut (a prohibited species), Alaska plaice, arrowtooth flounder, flathead sole, Greenland turbot, Kamchatka flounder, rock sole, and yellowfin sole.

<sup>2</sup> Pollock other than midwater trawl pollock, Atka mackerel, and “other species” fishery category.

<sup>3</sup>“Other species” for PSC monitoring includes skates, sharks, and octopuses.

<sup>4</sup>In October 2025, the Council recommended and NMFS proposes that the red king crab bycatch limit within the RKCSS be limited to 25 percent of the red king crab PSC limit (see § 679.21(e)(3)(ii)(B)(2)).

Table 10–Final 2026 and 2027 Prohibited Species Bycatch Allowances for the BSAI Trawl Limited Access Sectors and Pacific Cod Trawl Cooperative Programs

BSAI trawl limited access sector fisheries	Prohibited species and area <sup>1</sup>				
	Halibut mortality (mt) BSAI	Red king crab (animals) Zone 1	C. opilio (animals) COBLZ	C. bairdi (animals)	
				Zone 1	Zone 2
Yellowfin sole	250	23,337	3,521,725	346,228	1,185,500
Rock sole/flathead sole/Alaska plaice/other flatfish <sup>2</sup>					
Greenland turbot/arrowtooth flounder/Kamchatka flounder/sablefish					
Rockfish April 15-December 31	5		2,972		1,000
Total Pacific cod <sup>3</sup>	315	2,955	148,531	60,000	50,000
AFA CP Pacific cod	6	278	13,962	5,640	4,700
PCTC Program Pacific cod, A and B	220	1,653	83,097	33,567	27,973
Trawl CV Pacific cod, C season	15	134	6,728	2,718	2,265
PCTC Program unallocated reduction	73	890	44,744	18,075	15,062
Pollock/Atka mackerel/other species <sup>4</sup>	175	197	14,853	5,000	5,000
Total BSAI trawl limited access sector PSC	745	26,489	3,688,081	411,228	1,241,500

Note: Seasonal or sector apportionments may not total precisely due to rounding.

<sup>1</sup>Refer to § 679.2 for definitions of areas and zones.

<sup>2</sup>“Other flatfish” for PSC monitoring includes all flatfish species, except for halibut (a prohibited species), Alaska plaice, arrowtooth flounder, flathead sole, Greenland turbot, Kamchatka flounder, rock sole, and yellowfin sole.

<sup>3</sup>With the implementation of the PCTC Program, the BSAI trawl limited access sector Pacific cod PSC limits for halibut and crab are split between AFA CPs, PCTC A and B-season for trawl CVs, and open access C-season. NMFS will apply a 25 percent reduction to the A and B season trawl CV sector halibut PSC limit in the annual harvest specifications after the Council recommends and NMFS approves the BSAI trawl limited access sector’s PSC limit apportionments to fishery categories including the Pacific cod fishery category. In addition, NMFS will apply a 35 percent reduction to the A and B season trawl CV sector crab PSC limit. Any amount of the PCTC Program halibut or crab PSC limits remaining after the B season may be reapportioned to the trawl CV open access fishery in the C season. Because the annual PSC limits for the PCTC Program are not a fixed amount established in regulation and, instead, are determined annually through the harvest specification process, NMFS must apply the reduction to the A and B season apportionment of the trawl CV sector apportionment to implement the overall PSC reductions under the PCTC Program.

<sup>4</sup>“Other species” for PSC monitoring includes skates, sharks, and octopuses.



Table 11–Final 2026 and 2027 Halibut Prohibited Species Bycatch Allowances for Non-Trawl Fisheries

Non-trawl fisheries	Seasons	Catcher/processor	Catcher vessel	All Non-Trawl
Pacific cod	Annual Pacific cod	648	13	661
	January 1-June 10	388	9	n/a
	June 10-August 15	162	2	n/a
	August 15-December 31	98	2	n/a
Non-Pacific cod non-trawl-Total	May 1-December 31	n/a	n/a	n/a
Groundfish pot and jig	n/a	n/a	n/a	Exempt
Sablefish hook-and-line	n/a	n/a	n/a	Exempt
Total for all non-trawl PSC	n/a	n/a	n/a	710

Note: Seasonal or sector apportionments may not total precisely due to rounding.

Table 12–Final 2026 and 2027 Pacific Halibut Discard Mortality Rates (DMR) for the BSAI

Gear	Sector	Halibut discard mortality rate (percent)
Pelagic Trawl	All	100
Non-Pelagic Trawl	Mothership and catcher/processor	86
Non-Pelagic Trawl	Catcher vessel	62
Hook-and-line	Catcher vessel	10
Hook-and-line	Catcher/processor	10
Pot	All	19

Note: Seasonal or sector apportionments may not total precisely due to rounding.

Table 1. Harvest specifications for BSAI Groundfish for 2026 and 2027

pre-meeting DRAFT, November 2025

Species	Area	2024				2025				2026			2027		
		OFL	ABC	TAC	Catch through 12/31/24	OFL	ABC	TAC	Catch through 11/8/25	OFL	ABC	TAC	OFL	ABC	TAC
Pollock	BS	3,162,000	2,313,000	1,313,580	1,311,261	2,957,000	2,417,000	1,389,000	1,324,556	2,496,000	2,036,000	1,375,000	2,496,000	2,036,000	1,375,000
	AI	51,516	42,654	5,420	4,999	55,728	46,051	5,000	4,527	56,231	46,437	19,000	56,231	46,437	19,000
	Bogoslof	115,146	86,360	250	23	77,354	58,015	250	63	77,354	58,015	250	77,354	58,015	250
Pacific cod	BS	200,995	167,952	147,753	142,783	183,509	153,617	133,602	111,227	169,243	141,520	123,077	169,243	141,520	123,077
	AI	18,416	12,431	8,080	4,169	16,782	13,376	8,694	4,608	16,273	12,973	8,433	16,273	12,973	8,433
Sablefish	BSAI/GOA	55,084	47,146	n/a	6,333	58,532	47,605	n/a	4,672	57,797	47,008	n/a	57,797	47,008	n/a
	BS	n/a	11,450	7,996	4,591	n/a	13,203	8,496	3,751	n/a	13,037	8,996	n/a	13,037	8,996
	AI	n/a	13,100	8,440	1,742	n/a	11,566	7,940	921	n/a	11,421	7,440	n/a	11,421	7,440
Yellowfin sole	BSAI	305,298	265,913	195,000	91,192	299,247	262,557	135,000	80,971	305,039	267,639	145,000	305,039	267,639	145,000
	BSAI	3,705	3,188	3,188	768	2,598	1,678	1,678	618	2,059	1,328	2,059	1,328	2,059	1,328
Greenland turbot	BS	n/a	2,687	2,687	462	n/a	1,415	1,415	406	n/a	1,120	1,120	n/a	1,120	1,120
	AI	n/a	501	501	305	n/a	263	263	212	n/a	208	208	n/a	208	208
Arrowtooth flounder	BSAI	103,280	87,690	14,000	10,660	104,428	88,683	14,000	9,024	102,472	87,035	14,000	102,472	87,035	14,000
Kamchatka flounder	BSAI	8,850	7,498	7,498	5,157	8,019	6,800	6,800	5,038	7,790	6,606	6,606	7,790	6,606	6,606
Northern rock sole	BSAI	197,828	122,091	66,000	29,855	165,444	157,487	75,000	39,947	166,220	158,225	75,000	166,220	158,225	75,000
Flathead sole	BSAI	81,605	67,289	35,500	13,176	101,621	83,807	36,000	8,432	106,283	87,700	36,000	106,283	87,700	36,000
Alaska plaice	BSAI	42,695	35,494	21,752	10,399	34,576	28,745	15,903	6,947	33,965	28,230	16,200	33,965	28,230	16,200
Other flatfish	BSAI	22,919	17,189	4,500	3,197	26,083	19,562	4,500	5,353	26,083	19,562	4,500	26,083	19,562	4,500
	BSAI	49,010	41,096	37,626	37,096	44,594	37,375	33,458	31,652	43,084	36,578	33,490	43,084	36,578	33,490
Pacific Ocean perch	BS	n/a	11,636	11,636	11,746	n/a	10,121	10,121	9,483	n/a	9,905	9,905	n/a	9,905	9,905
	EAI	n/a	7,969	7,969	7,792	n/a	6,278	6,278	6,003	n/a	6,144	6,144	n/a	6,144	6,144
	CAI	n/a	5,521	5,521	5,250	n/a	5,559	5,559	4,803	n/a	5,441	5,441	n/a	5,441	5,441
	WAI	n/a	15,970	12,500	12,308	n/a	15,417	11,500	11,363	n/a	15,088	12,000	n/a	15,088	12,000
Northern rockfish	BSAI	23,556	19,274	16,752	8,809	22,848	18,694	12,000	8,014	22,284	18,232	12,000	22,284	18,232	12,000
Blackspotted/Rougheye Rockfish	BSAI	761	569	569	639	838	706	706	642	902	766	766	902	766	766
	BS/EAI	n/a	388	388	201	n/a	408	408	224	n/a	441	441	n/a	441	441
	CAI/WAI	n/a	181	181	439	n/a	298	298	418	n/a	325	325	n/a	325	325
Shortraker rockfish	BSAI	706	530	530	177	631	473	473	301	631	473	473	631	473	473
Other rockfish	BSAI	1,680	1,260	1,260	1,361	1,406	1,054	1,054	1,026	1,406	1,054	1,054	1,406	1,054	1,054
	BS	n/a	880	880	788	n/a	639	639	504	n/a	639	639	n/a	639	639
	AI	n/a	380	380	573	n/a	415	415	522	n/a	415	415	n/a	415	415
Atka mackerel	BSAI	111,684	95,358	72,987	72,173	122,622	103,247	82,000		107,889	92,361	82,941	107,889	92,361	82,941
	BS/EAI	n/a	41,723	32,260	31,765	n/a	46,650	39,000	37,871	n/a	41,731	41,731	n/a	41,731	41,731
	CAI	n/a	16,754	16,754	16,654	n/a	28,511	24,443	24,121	n/a	23,716	23,716	n/a	23,716	23,716
	WAI	n/a	36,882	23,973	23,754	n/a	30,087	18,557	18,448	n/a	26,914	17,494	n/a	26,914	17,494
Skates	BSAI	45,574	37,808	30,519	27,146	44,086	36,523	27,646	19,503	43,285	35,833	27,646	43,285	35,833	27,646
Sharks	BSAI	689	450	400	174	689	450	400	197	689	450	400	689	450	400
Octopuses	BSAI	6,080	4,560	400	246	6,080	4,560	400	296	6,080	4,560	400	6,080	4,560	400
<b>Total</b>	BSAI	4,609,077	3,476,801	2,000,000	1,781,793	4,334,715	3,588,066	2,000,000	1,748,054	3,849,059	3,188,585	2,000,000	3,849,059	3,188,585	2,000,000

Sources: 2024 and 2025 Final BSAI Harvest Specifications (published March 2024), 2025 and 2026 Final BSAI Harvest Specifications (published March 2025); 2026-2027 Proposed BSAI Harvest Specifications (Council recommendations, October 2025), Catch Accounting System. Changes from previously posted Table 1 in blue reflect additional flatfish exchanges that occurred between December 2024 and the FR publishing in March 2025.

Note: BSAI catch (not AK wide catch) for sablefish included in total. ABCs are at the level of the stock or stock complex and shown in "Total" rows. Any quantities shown in "Area" rows are spatial apportionments of ABC and do not reflect ACLs. 2026 and 2027 quantities based on 2026-2027 Proposed BSAI Harvest Specifications (October 2025); 2024 and 2025 OFLs, ABCs, and TACs are from harvest specifications adopted by the Council in December 2023 and 2024, respectively. Catch data are from the Catch Accounting System accessed 11/13/2025. \* TACs for AI pollock BS pollock, yellowfin sole, northern rocksole and flathead sole differ from the Council December 2024 motion to reflect inseason reallocation of pollock and flatfish exchanges. On June 27 the TAC for "other flatfish" was raised from 4,500 mt to 5,225 mt through a release of non-specified reserves.

## **C6 BSAI Crab Specs – Norton Sound Red King Crab**

The AP acknowledges the receipt of the CPT report and SAFE document. The AP recommends the Council approve the 2026 OFL and ABC for Norton Sound Red King Crab as recommended by the SSC.

*Motion passed 19-0*

### Rationale in Support of Motion

- *The AP appreciated the final work product of the Crab Plan Team, and the two new authors, adopting the 2026 OFL and ABC as recommended by the SSC with no concerns or discussion.*

## **C7 Charter Halibut Annual Management Measures**

For the 2026 charter fishing season in IPHC Regulatory Areas 2C and 3A, the AP recommends:

### **For IPHC Area 2C:**

All allocations shown below include a daily bag limit of one halibut and a reverse slot size limit where the upper limit is fixed at 080 (halibut 80 inches or longer may be retained).

1) If the allocation is at or above 0.858 Mlb:

- Begin with a lower size limit of U37 (retained halibut must be less than or equal to 37 inches in length) and increase the lower size limit until the allocation is reached, as indicated in Table 2C.4 (page 19) of the ADF&G analysis.

As indicated in Table 2C.6b (page 22) of the ADF&G analysis:

2) If the allocation is less than 0.858 Mlb but greater than or equal to 0.715 Mlb:

- Begin with a lower size limit of U37 closing Thursdays starting September 10 working to May 14 until the allocation is reached.

3) If the allocation is less than 0.715 Mlb but greater than or equal to 0.691 Mlb:

- Begin with a lower size limit of U36 closing Thursdays starting September 10 working to May 14 until the allocation is reached.

4) If the allocation is less than 0.691 Mlb but greater than or equal to 0.651 Mlb:

- Begin with a lower size limit of U35 closing Thursdays starting September 10 working to May 14 until the allocation is reached.

5) If the allocation is less than 0.651 Mlb but greater than or equal to 0.626 Mlb:

- Begin with a lower size limit of U34 closing Thursdays starting September 10 working to May 14 until the allocation is reached.

6) If the allocation is less than 0.626 Mlb but greater than or equal to 0.594 Mlb:

- Begin with a lower size limit of U33 closing Thursdays starting September 10 working to May 14 until the allocation is reached.

7) If the allocation is less than 0.594 Mlb but greater than or equal to 0.566 Mlb:

- Begin with a lower size limit of U32 closing Thursdays starting September 10 working to May 14 until the allocation is reached.

**For IPHC Area 3A:**

All allocations shown below include, unless otherwise specified:

A daily bag limit of 2 halibut. One fish of any size and one fish with a maximum size limit of 28 inches. 1 trip per charter vessel per day with retention of halibut; and 1 trip per charter halibut permit per day. All Wednesdays to be closed to the retention of halibut.

1) If the allocation is greater than or equal to 1.772 Mlb, raise the size of the second fish until the allocation is reached with no Tuesday closures as indicated in Table 3A.13 (page 33) of the ADF&G analysis.

2) If the allocation is less than or equal to 1.771 Mlb, but greater than or equal to 1.430 Mlb: lower the size of the second fish to as low as 27 inches. Close Tuesdays as needed to keep charter harvest removals within the Area 3A allocation, as indicated in Table 3A.13 (page 33) of the ADF&G analysis.

3) If the allocation is below 1.430 Mlb, but greater than or equal to 1.403 Mlb: Lower the size of the second fish to as low as 26 inches, continue to close Tuesday as needed until the projected charter harvest removals meet the allocation, as indicated in Table 3A.13 (page 33) of the ADF&G analysis.

4) If the allocation is below 1.403mlb, but greater than or equal to 1.327mlb, in addition to all closed Tuesdays and a second fish of 26 inches, adjust the season start date to open between May 1 and May 29 to align with allocation (Table 3A.14).

5) If the allocation is below 1.327mlb, but greater than or equal 1.243mlb, in addition to all closed Tuesdays, a second fish of 26 inches, and a season start date of May 29, adjust the season close date between September 28 and September 1 to align with allocation (Table 3A.14).

6) If the allocation is below 1.243mlb, in addition to all closed Tuesdays, a season start date of May 29, and a season close date of September 1, implement a daily bag limit of 1 halibut of any size (Table 3A.17).

*Motion passed 19-0*

*Rationale in Support of Motion*

- *The measures for areas 2C and 3A attempt to represent a huge variance in operations – the charter halibut fishery include lodges, multi day live-a-boards, full and half day operators, inspected and uninspected passenger vessels, vessels launched daily from shore and departing from harbors, high volume cruise ship ports and areas both on and off the road system.*
- *The 2C motion reflects a status quo approach of reverse slot options, maximizing the lower size limit allowed by the allocation.*
- *Once the lower limit drops to 37", Thursday closures apply as needed to maintain fish 37" repeating for 36", 35" etc. as needed to remain within the allocation.*
- *The removal of a single trip per vessel per day limitation at the cost of inches on the lower spectrum is a notable change for 2026 recommendations, as the committee considered the needs of stakeholders at points of access who rely on multiple trips per day.*
- *The 2C committee representatives noted that the recent and anticipated harvest measures have become a big deterrent for repeat and new customers. Many businesses have come to rely on expensive GAF options to subsidize opportunity.*
- *The 3A motion considers consistency for anglers and operators as much as possible when making the range of recommended measures. These favor a status quo approach which prioritizes the potential to include fewer closed Tuesdays as a primary driver over a larger second fish. They also include measures down to a 25% decline in allocation as requested by the council in 2024.*
- *There are two newly explored management levers here that were expectedly contentious, which staff analyzed to meet the 25% decline request. One involved seasonal opening and closing dates, and another was a single fish limit. Neither had ever been implemented in 3A.*
- *The single fish analysis was done to the best ability given the data, though having nothing to compare it to, the ranges were largely estimated. The analysis illustrated a significantly larger mean fish with a single fish limit, and as the industry are not managing to individual fish but to mean weight, there was favor given to the second fish model which lowers the average weight and thus was put forward as the prioritized preferred option.*
- *Some 3A stakeholders express concern about these new seasonal levers, and ultimately having a conversation about a 25% reduction is consistently going to be a challenging one with negative impacts to all users.*
- *The ability to retain the core operating part of the season was prioritized in these measures, with a status quo approach for stability to the operators as well as end users.*

- *It is important to mention that these low abundance management measures for both areas 2C and 3A have an extremely imbalanced economic impact on stakeholders as well as all facets of their communities when compared against the impact to the halibut stock itself. In short, the cuts implied have no measurable effect on the spawning biomass, but are critical to the solvency of those participating in the industry.*

## **D1 NSRKC Participation Recency**

The AP recommends the Council take no further action.

*Motion passed 18-0*

### Rationale in Support of Motion

- *The AP noted that the Council initiated the discussion paper to bring a better understanding of the NSRKC super exclusive summer fishery in response to stakeholder concerns. The AP felt this discussion paper fulfilled this purpose, bringing background information on how the fishery is structured and prosecuted.*
- *While the AP did hear oral testimony from one stakeholder organization, there was no additional input or engagement from the public to initiate an analysis. Without a stronger request from stakeholders, the AP felt this may be untimely considering council staff constraints and funding shortages.*
- *The AP also noted two aspects of the program design that stakeholders did not wish to change, which would still allow increased participation or capacity in the fishery, making a recency action likely to not have a significant benefit:*
  - *Oral testimony indicated that the main stakeholder group wished to maintain the LLP requirement exemption for boats < 32 feet; with no limit on the number of vessels of that size that could participate in the future, it could potentially decrease harvest opportunity for current participants.*
  - *The staff presentation and discussion paper indicated that the majority of permitted boats that participate are still closer to 32 feet in length, with few vessels participating at the 60 ft MLOA. Larger vessels could still purchase LLPs and enter the fishery to increase vessel capacity without exceeding the 60 ft MLOA.*

## **D2 EFH 5-Year Review**

The AP appreciates the opportunity to review the 2028 EFH 5-Year Review Plan and recommends the Council endorse the following prioritized components.

Component 1: EFH descriptions and identification

Component 2: Fishing activities that may adversely affect EFH

Component 6: Conservation and enhancement of EFH

Component 7: Changes to the availability of major prey species for Council-managed species

Component 10: Review and revision of EFH components of FMPs

The AP recommends that the Council consider the SSC's review of the 2028 EFH 5-year Review Plan in February 2026 to include broad input on the scope of work beyond just Component 1 and 2.

*Motion passed 19-0*

*Rationale in Support of Motion*

- *The AP Recognizes and appreciates the experts efforts in determining prioritized components for the 2028 EFH Review.*
- *The scope is limited to 5 of 10 components and focuses on a subset of commercially important species; the reduced scope is understandable given current staffing and resource limitations.*
- *The scope and therefore workplan is pragmatic and robust in expected outputs, despite limitations.*
- *North Pacific ecosystem changes due to climate change make a strong EFH review critical.*
- *Cumulative impacts, non-MSA fishing effects, non-fishing effects, and research needs are not prioritized this cycle. Some aspects of these components will still be addressed through other processes and annual reports, though less comprehensively.*
- *SSC review will ensure scientific standards and robust methodology. The SSC is currently scheduled to review only Components 1 and 2 in February but for transparency it would be helpful to understand whether the SSC will review the remaining prioritized components and when.*
- *Component 8 (HAPC process initiation) was not included in the motion because the Council can initiate HAPC identification at any time.*
- *Expanding EFH Review scope, even the inclusion of Component 8, would require additional resources; other components should be included as a priority if resources increase.*

**E Staff Tasking Motion #1: CHLA**

The AP requests the Council initiate a discussion paper of Charter Halibut Permit use and the effects of CHLAP on effort and harvest measures.

Discussion Paper should include data for each permit type- transferable, non-transferable, CQE, and Military permits -and for each Area 2C and 3A.

The Discussion Paper should include the following and may include additional information analysts find noteworthy:

1. Trends in annual renewal and retirement.
2. Trends in ownership transfer and lease transfer.

**3. Issuance of CQE CHP to non-active CQE entities.**

4. A description of the extent to which businesses exceed CHP caps through lease transfer.
5. Trends in CHP activity in terms of both trip counts and angler days. Include a description of any relationship between trends in angler-days and non-transferable CHP use.
6. Holding constant the most recent FCEY, average weight, and HPU, project the maximum effort level allowing for the following harvest measures:
  - 2C
    - U45080 reverse slot with no additional harvest measures.
    - One fish of any size with no additional harvest measures.
    - Two fish of any size with no additional harvest measures.
  - 3A
    - One fish of any size and a second fish of 28", closed Wednesdays, and a one-trip daily limit.
    - One fish of any size and a second fish of 32" with no additional harvest measures.
    - Two fish of any size with no additional harvest measures.
7. Holding constant the most recent FCEY, average weight, HPUE, and angler effort, project the maximum harvest measures available assuming full RQE pools:
  - For 2C use a reverse slot table.
  - For 3A, in order, increase size of the second fish up to 32", open up days of the week, repeal the one-trip daily limit.

*Amendment passed 18-0*

*Amended Motion passed 18-0*

*Rationale in Support of Amended Main Motion*

- *The Council has a responsibility to measure the effectiveness of its programs across time and the effects of those programs on the fisheries it manages; there is no scheduled, required review of this program like exists for other programs.*
- *There is no recent analysis on CHLAP performance or trends, or how capacity in the program relates to harvest measures available to guided anglers.*
- *There is a concern from stakeholders about the utilization of lease transfers, and specifically associated with understanding how non-transferrable CHP are being utilized.*



- *There is no comprehensive understanding of how effective the CHLAP program has been utilized, and particularly since annual registration requirements have been put into place since 2020, with the rollout of the RQE.*
- *The RQE is also scheduled for implementation in 2026. The program will lean on trend information in CHP activity and available harvest measures to make tactical decisions on quota purchases, CHP purchases, and to project revenue. Without analysis, it will be restricted in its ability to perform those tasks.*
- *The proposed discussion paper will provide important context for administrators and stakeholders for both programs. It was highlighted that this motion includes elements from a similar motion the Committee recommended in December 2024. That previous motion was not approved by the Council at that time; however, the rationale provided by the Council highlighted limited staff capacity at the time given that these staff were also engaged in efforts for the RQE funding mechanism.*
- *CQE's that have applied for CHP's are issued the permits annually regardless of their current status. There are many CQE's that were formed then dissolved or became inactive that will receive CHP's annually. It is unknown if they are being used or even if the communities know they are being issued, but they should not be issued to an entity that is not in good legal standing. This has been an issue for many years and RAM is aware of this.*

## **E Staff Tasking Motion #2: Unguided Sport**

The AP recommends the Council bring together representatives from the following agencies: IPHC, ADFG, NOAA/NMFS and a legislative representative or their staff, from Southeast Alaska, to address the issues of the growing unguided sport fish sector halibut take. The Council could consider to focus solely on area 2C or both areas 2C and 3A in the event this issue grows across the entire sector.

*Motion passed 17-0*

### *Rationale in Support of Motion*

- *This is a universally desired action from testimony given from all user groups. The unguided rental sector as a result is clearly and very effectively bypassing all management measures.*
- *This has been an issue for many years and it has been brought up in all possible forums, NPFMC, IPHC and BOF. Each time it is brought forward each agency punts it to the next and there are concerns that it can not be dealt with within one agency alone. The voices of concern on this issue have become louder and we urge the Council to initiate a cross agency discussion to help identify a path forward.*
- *Harvest of halibut in this sector has grown by 35% in the last year and it currently doubles the guided sport harvest in area 2C. This sector does not have logbook reporting or accountability measures other than dock surveys and mail in surveys which have very little response rate. While both the commercial and guided sport have been restricted in recent years, there have been no similar harvest restrictions on this user group.*

- *The spawning stock biomass of halibut is at its lowest levels in its time series and most areas are expecting further cuts this coming year following the IPHC meeting in January 2026.*
- *There are growing concerns across all halibut user groups, commercial, guided sport, recreational and subsistence and growing concerns from other entities that also rely on halibut for PSC.*
- *There are other more serious concerns about the legality of the way the unguided vessels are being offered. This is basically a guided charter, but without a captain with local knowledge and experience operating a vessel. The areas these vessels are operating are at times in open waters and areas that experienced captains avoid. There are safety concerns and there have been accidents and even deaths of people renting these vessels.*
- *An AP member noted that all other halibut user groups are managed and the Council frequently receives testimony and requests to update management for already managed sectors, including a recent ask for the Council to consider Gulf of Alaska abundance based management for halibut.*