

F1 AP Motion - Enactment of Small Sablefish Release Rule Change

The Advisory Panel recommends that the Council request assistance from NMFS Headquarters in Washington, D.C., to ensure that the small sablefish release amendment is enacted in time for implementation during the 2027 fishing season.

Motion passes 15-0

Rationale in Support of Motion

- *The slow pace that NOAA has taken to work on most of the recent actions from our council is frustrating. And it's worth signaling to NOAA what should be prioritized.*
- *But there is a component of managing expectations regarding what the council can achieve by signaling to NOAA, and what NOAA can do to increase that pace given less resources.*
- *The council took final action on this issue in 2025 and it appears it will not be implemented until 2028.*
- *During final action of small sablefish release, it was noted that there are tools such as the Exempted Fishing Permit (EFP) to essentially test, work through the pinch points, start collecting data on whether or not the program could be successful or gain an empirical understanding of catch accounting and mortality, or determine if or what kind of observer coverage needs to be set up.*
- *We heard that there are assumptions of what this small sablefish release regulation would do for recovery or economics, but the fleet could already be collecting that data and building a record. Similar examples of this type of "pre-regulatory" testing via EFPs can be found in the Deck sorting EFP and trawl EM EFP. It's important to identify to the public and stakeholders that, in a low resource situation that NOAA is in, there are tools that could be used for testing and data collection in the meantime.*
- *An AP member noted in response to public comment that the small sablefish action still needs to be implemented appropriately as written when the Council took final action.*
 - *There are differences in monitoring levels between IFQ CVs (subject to partial coverage budget & deployment rates) and freezer longliner CPs (100-200% monitoring) that warrant the different approach the Council took for IFQ CVs compared to the freezer longliners. The AP also mentioned that when asked during the process of the small sablefish action, IFQ CV stakeholders indicated they would not agree to 100% monitoring for the action and the Council maintained status quo monitoring.*
 - *The AP reiterated that this lower level of monitoring and the need for sablefish catch and release discard mortality to be appropriately accounted for in the sablefish stock assessment led to the creation of a Sablefish Discard Allowance (SDA). While it may complicate implementation, the SDA and accurate stock assessments are necessary for conservation.*