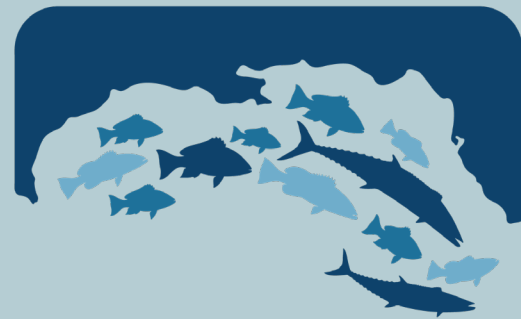


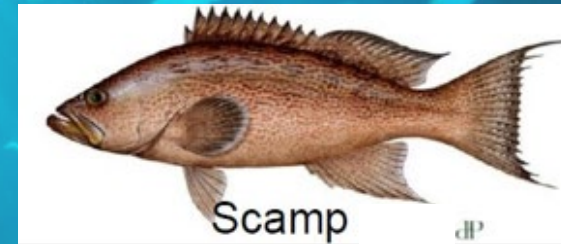
# Discussion of Amendment 58A: IFQ Distribution (Action 1.2) and Black Grouper Complex Accountability Measures (Action 3)



**GULF**  
**COUNCIL**

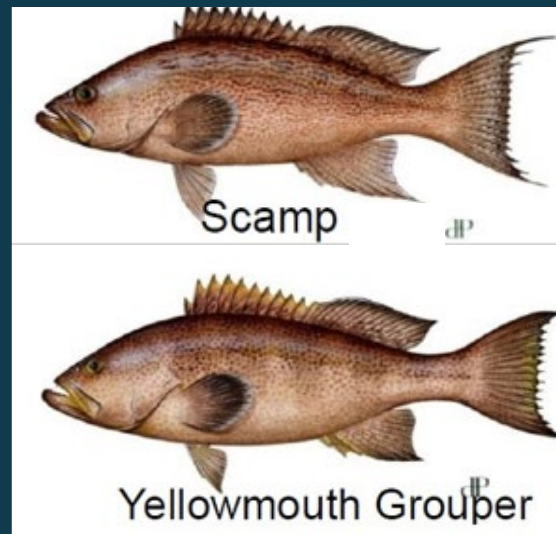
# Document Purpose and Need

- Other shallow-water (SWG) grouper complex
  - Scamp, yellowmouth grouper, black grouper, yellowfin grouper
- Scamp and yellowmouth assessed in SEDAR 68 (March 2023)
  - Updated catch advice (~50%) reduction in harvest
  - Assessment informed by MRIP-FES
  - Managed within Gulf Council jurisdictional boundary
- Black grouper and yellowfin grouper have not been assessed
  - Black grouper jointly managed with SAFMC
  - Catch limits provided from Generic ACL/AM Amendment
  - Catch limits informed by MRFSS



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  - Black grouper jointly managed with SAFMC
  - Catch limits provided from Generic ACL/AM Amendment
  - Catch limits informed by MRFSS
- **Need to break up existing complex into 2 new complexes and update catch levels consistent with BSIA:**
  - **Black Grouper Complex = black grouper + yellowfin grouper**
  - **Scamp Complex = scamp + yellowmouth grouper**



# Motions from August 2025 Council Meeting

## **Break up of Other SWG Complex Action**

1. Re add the [IFQ distribution] alternatives from the Considered but Rejected section of the document. Additionally, to develop options for setting share caps for the new complexes.

## **Black Grouper Complex Recreational AM Action**

2. Modify posts-season AM as follows:
  - A post-season recreational AM would be implemented for the Black Grouper Complex if the recreational *ACL and the Black Grouper complex ACL* are exceeded. In the year following an overage, NMFS would close the recreational black grouper complex to harvest when the recreational ACL is met or is projected to be met, unless NMFS determines based upon the best scientific information available (BSIA) that closure of the recreational fishing season is unnecessary.
3. Move and in-season AM 4 to Considered but Rejected.
4. New Alternative: For the recreational sector, if the average recreational black grouper complex landings exceed the average recreational ACL, and the average black grouper complex landings exceed the average black grouper complex ACL over a three-year moving period, the Regional Administrator would reduce the duration of the recreational season by the amount projected such that the recreational ACL is not exceeded during the following fishing year unless NMFS determines based upon the best scientific information available (BSIA) that no adjustment to the recreational fishing season is necessary.

# Break up of Other SWG Complex Action

## **Discussion of Action 1.2**

# Action 1.2: Distribution of IFQ Program Shares to Newly Established Scamp and Black Grouper Complex Share Categories

**Alternative 1:** No Action. Proportionally distribute Scamp Complex and Black Grouper Complex share categories based on existing Other SWG share percent and maintain the IFQ *share category*.

**Alternative 2.** Proportionally distribute Scamp Complex and Black Grouper Complex share categories based on *landings histories of species* within each sub-complex. Scamp and yellowmouth grouper landings would determine landings history for Scamp Complex. Black grouper and yellowfin grouper landings would determine landings history for Black Grouper Complex.

**Option 2a:** Use landings history from 2011 – 2024

**Option 2b:** Use landings history from 2016 – 2024

**Option 2c:** Use landings history from 2020 – 2024

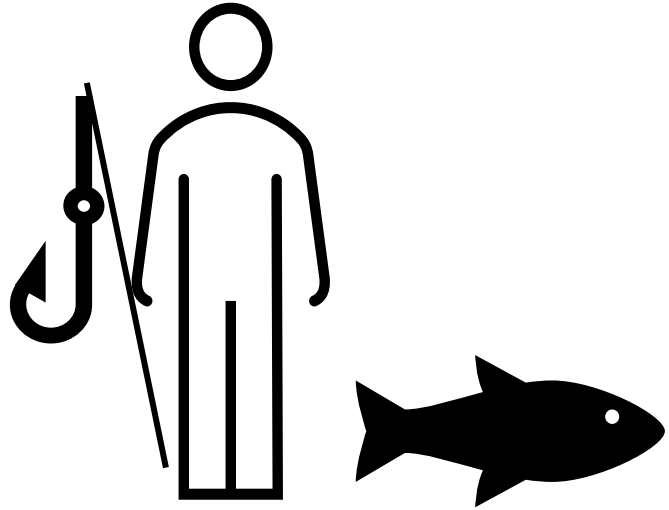
**Alternative 3.** Proportionally distribute Scamp Complex and Black Grouper Complex share categories, with *50% based on existing Other SWG share percentages and 50% based on landings histories of species within each sub-complex*. Scamp and yellowmouth grouper landings would determine landings history for the Scamp Complex. Black grouper and yellowfin grouper landings would determine landings history for the Black Grouper Complex.

**Option 3a:** Use landings history from 2011 – 2024

**Option 3b:** Use landings history from 2016 – 2024

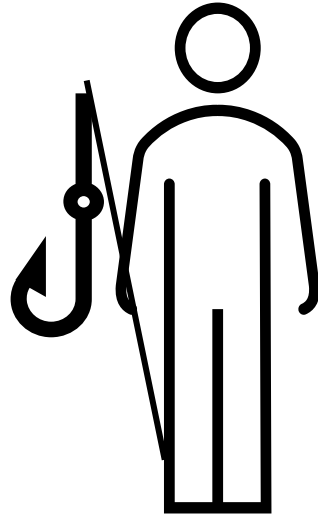
**Option 3c:** Use landings history from 2020 – 2024

# Introduction to IFQ shareholder types



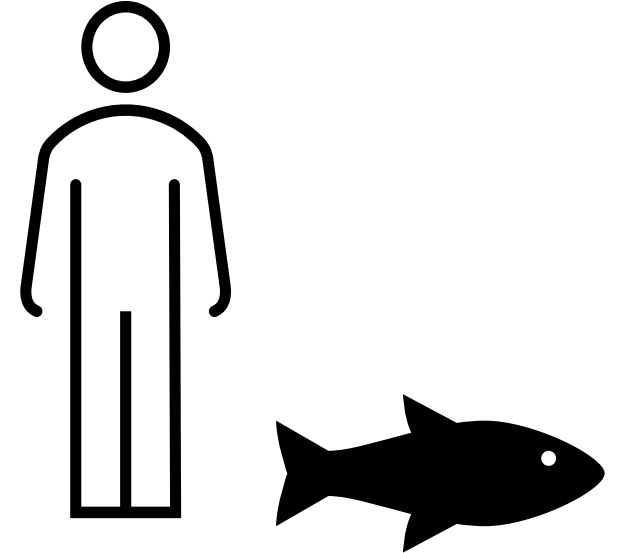
## **IFQ share holder with permit**

- Can land IFQ species
- Can lease in annual allocation
- Can lease out their annual allocation



## **Permit holder no IFQ shares**

- Can land IFQ species after purchasing shares or leasing annual allocation (lease in) from share holder
- Can also lease out IFQ allocation

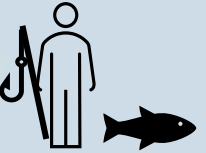

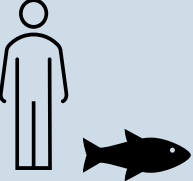


## **IFQ share holder no permit**

- Can lease in or out IFQ allocation but cannot land IFQ species

# Action 1.2: Overview of SWG IFQ Distribution Action

➤ *Alt. 1: Proportionally distribute Scamp Complex and Black Grouper Complex share categories based on existing Other SWG share percent only*

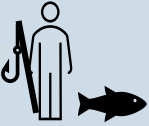
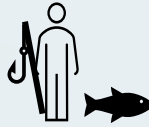



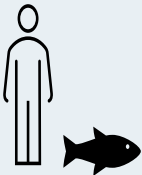

	Shareholder type	Current SWG Shares	Shares under Alt. 1	Change in shares
	Shareholder w/ permit	1% shares	1% shares of scamp 1% shares of BG	No change in shares*
	Permit no shares	0 shares	0% shares of scamp 0% shares of BG	No change in shares
	Shares no permit	1% shares	1% shares of scamp 1% shares of BG	No change in shares*

\* A shareholder could receive shares for a SWG species they have never landed before (e.g., only ever landed scamp but now has shares for the Black Grouper Complex share category). The IFQ program allows for shares to be harvested, leased, or divest.

# Action 1.2: Overview of SWG IFQ Distribution Action

➤ *Alt. 2: Uses **landings history only** of SWG species to calculate new IFQ shares*


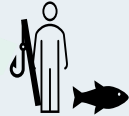



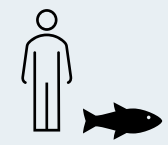

Leasing ≠ **landings**. Shares would be removed from accounts that lease proportional to the amount of leasing done from that account during the time periods considered in the Action.

	Shareholder type	Current SWG Shares	Landings	Shares under Alt. 2	Change in shares
	Shareholder w/ permit	1% shares = 1,000lb	1,000lb of scamp 0lb of BG	1% shares of scamp 0% shares of BG	No change in shares
	Shareholder w/permit	1% shares = 1,000lb	500lb of scamp 0lb of BG	0.5% shares of scamp 0% shares of BG	Lose 50% of current shares 
	Permit no shares	0 shares = 0lb	1,000lb of scamp	1% shares of scamp 0% shares of BG	Gain shares based on landings 
	Shares no permit	1% shares = 1,000lb	0lb	0% shares of scamp 0% shares of BG	Lose all shares 



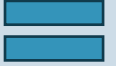















# Action 1.2: Overview of SWG IFQ Distribution Action

➤ *Alt. 3: Uses landings history and share percentage:*

Leasing ≠ **landings**. Shares would be removed from accounts that lease proportional to the amount of leasing done from that account during the time periods considered in the Action.

	Shareholder type	Current SWG Shares	Landings	Shares under Alt. 3	Change in shares
	Shareholder w/ permit	1% shares = 1,000lb	1,000lb of scamp 0 lb of BG	1% shares of scamp 0% shares of BG	No change in shares
	Shareholder w/permit	1% shares = 1,000lb	500lb of scamp 0 lb of BG	$(0.5 \times 1 \text{ shares}) + (0.5 \times 500\text{lb}) =$ 0.75% shares (750lb) scamp 0 shares of BG	Lose 25% of shares 
	Permit no shares	0 shares = 0lb	1,000lb of scamp	$(0.5 \times 0 \text{ shares}) + (0.5 \times 1,000\text{lb}) =$ 0.5% shares (500lb) scamp 0 shares of BG	Gain 50% of landings as shares 
	Shares no permit	1% shares = 1,000lb	0 lb	$(0.5 \times 1 \text{ shares}) + (0.5 \times 0 \text{ lb}) =$ 0.5% shares (500lb) scamp 0 shares of BG	Lose 50% of shares 

# Action 1.2: Overview of SWG IFQ Distribution Action

IFQ Participant Scenario	Alt 1. Share percentage only	Alt 2. Landings history only	Alt 3. Landings and share percentage
Lands all fish based on available shares			
Lands some fish; leases some fish annually			
Lands some fish; leases some fish annually, some allocation unused (not caught or leased)			
Lease only (does not land any fish)			
Lands all fish in some years but not all qualifying years (new entrant)			
Lease only fishermen, does not own shares			

# **Black Grouper Complex Recreational AM Action**

## **Discussion of Action 3**

# Action 3: Recreational Accountability Measures for the Black Grouper Complex

**Alternative 1:** No Action – Do not establish recreational sector accountability measures (AM) for the Black Grouper Complex.

**Alternative 2:** A post-season recreational AM would be implemented for the *Black Grouper Complex if the recreational ACL and the Black Grouper Complex ACL are exceeded*. In the year following an overage, NMFS would close the recreational Black Grouper Complex to harvest when the recreational ACL is met or is projected to be met, unless NMFS determines based upon the best scientific information available (BSIA) that closure of the recreational fishing season is unnecessary.

**Alternative 3:** For the recreational sector, if the average recreational Black Grouper Complex landings *exceed the average recreational ACL, and the average Black Grouper Complex landings exceed the average Black Grouper Complex ACL over a three-year moving period*, the Regional Administrator (RA) would reduce the duration of the recreational season by the amount projected such that the recreational ACL is not exceeded during the following fishing year unless NMFS determines based upon the best scientific information available (BSIA) that no adjustment to the recreational fishing season is necessary.

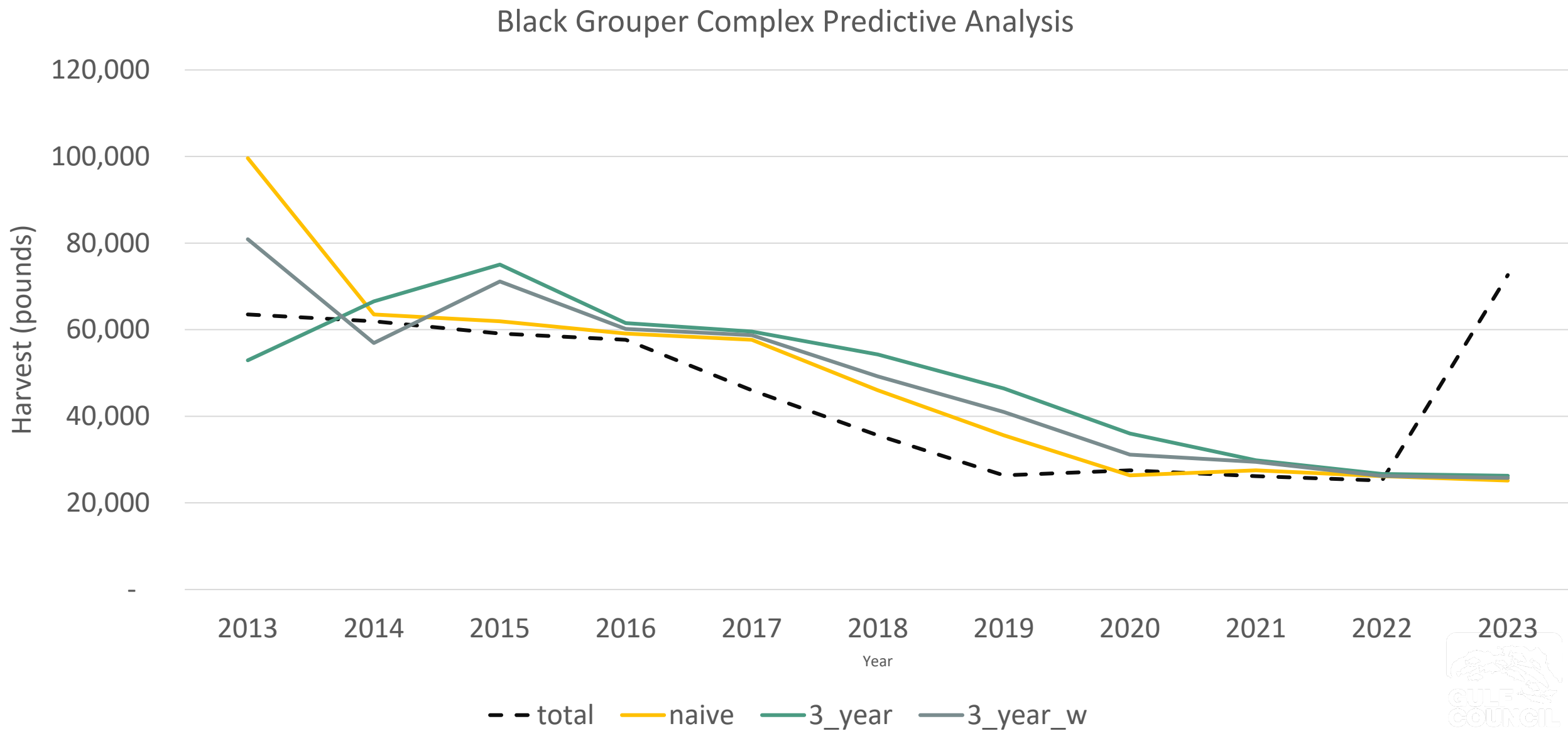
# Action 3: Exploring a 3-year moving average for the Black Grouper Complex

## Rudimentary prediction analysis (Appendix D)

*Does a three-year moving average provide a better prediction of Black Grouper Complex recreational landings than assuming what you caught last is what you'll catch this year?*

- Naïve prediction: What you caught last year is exactly what you will catch this year
- Three-year average: Take average of most recent 3-year landings to predict the next year
- Use a weighted three-year average: Weight some years more when calculating three-year average to predict the next year
  - Used Solver in Excel to optimize for lowest square error and inform weighting assignments to years

# Action 3: Exploring a 3-year moving average for the Black Grouper Complex



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## Rudimentary prediction analysis (Appendix D)

*Does a three-year moving average provide a better prediction of Black Grouper Complex recreational landings than assuming what you caught last is what you'll catch this year?*

Answer: No, does not appear so initially. The three-year average has difficulty capturing if there are truly needed management measures when landings are trending in any direction, as this approach can create a “lag”. That “lag” may take longer to reconcile with highly uncertain landings estimates. More investigation is warranted.

*Can an analysis be conducted to compare how historical Black Grouper Complex recreational landings look relative to the new recreational ACL considered in Action 2?*

Answer: YES!

# Action 3: Simulating Black Grouper Complex Recreational Landings (Appendix D)

## Simulation analysis set up

Year	OFL	ABC	Stock ACL	Comm ACL	Rec ACL
2027+	Undefined*	310,844	310,844	227,735	83,109

Black Grouper Complex Avg and SD Rec Landings (2000-2023): 22,852 +/- 40,239 lb

PSE range of black grouper only recreational landings (2000-2023): 31.1-96.9 with an average of 54.8+/-17.4.

Used a negative binomial probability distribution using average from 2000-2023

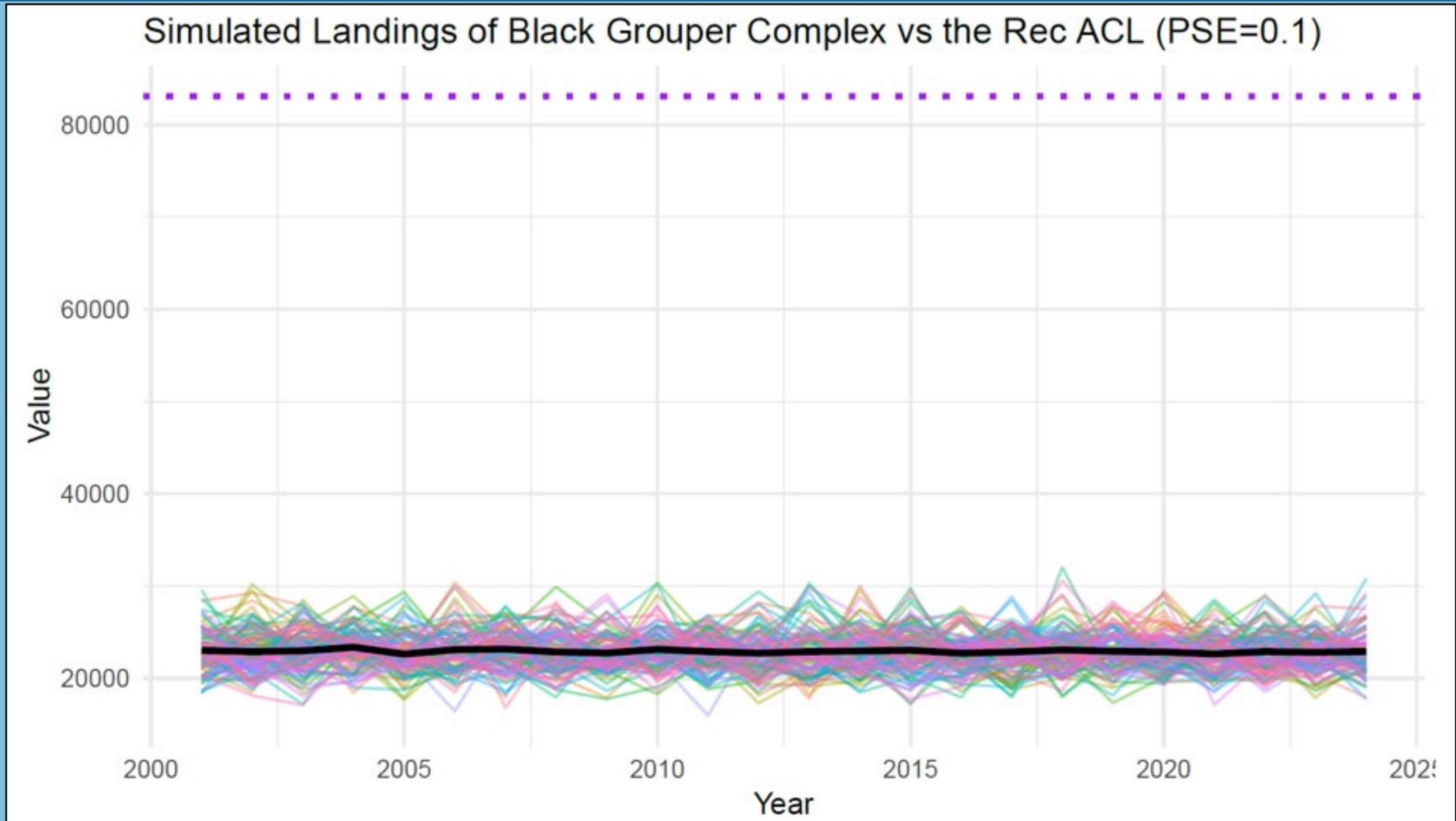
Set a “floor” of 0

Set a “ceiling” of highest observed landings \* PSE of 0.45

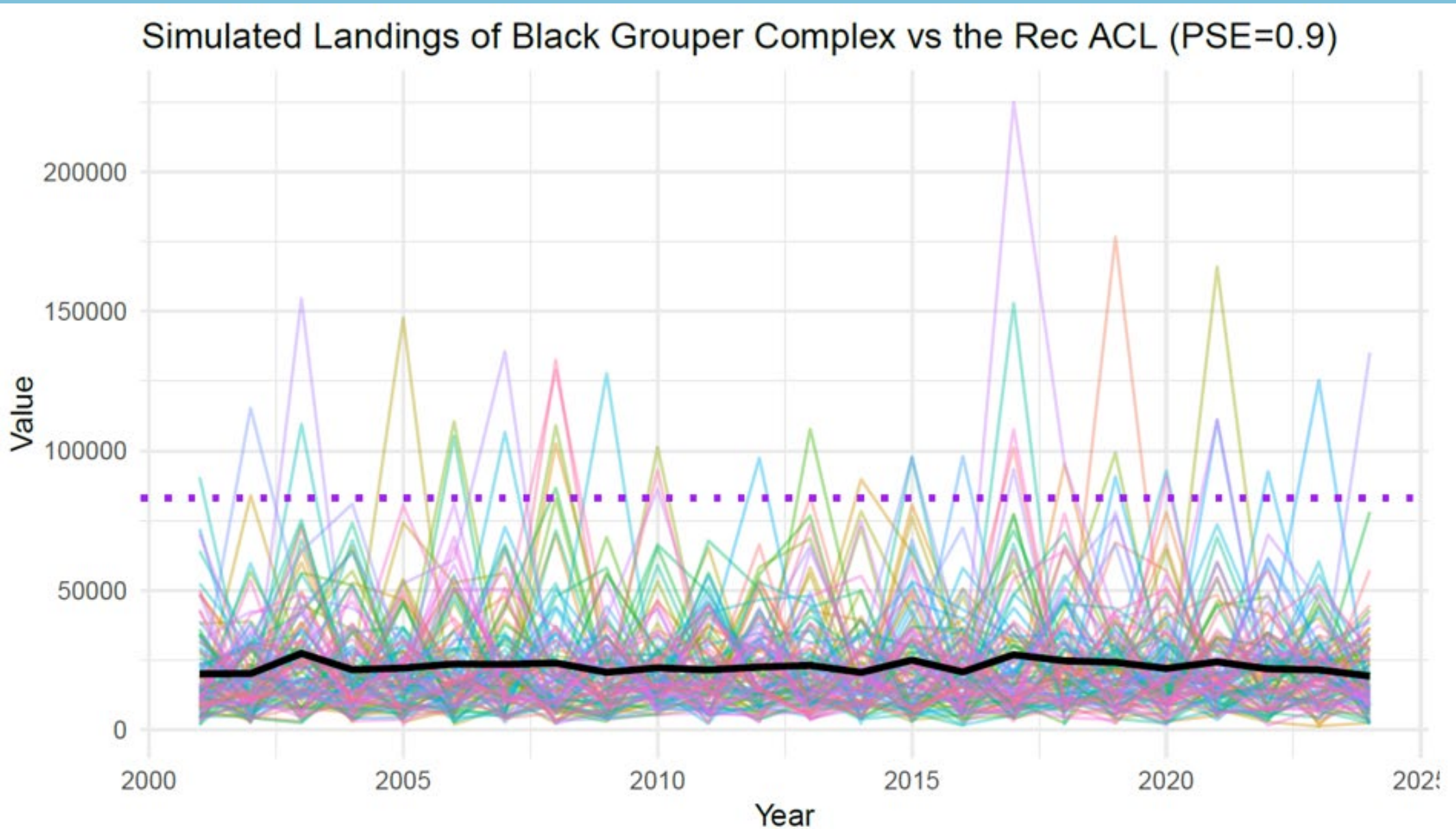
Ran 200 simulations

Use a variety of PSE values (10%, 30%, 50%, and 90%)

# Action 3: Simulating Black Grouper Complex Recreational Landings (Appendix D)



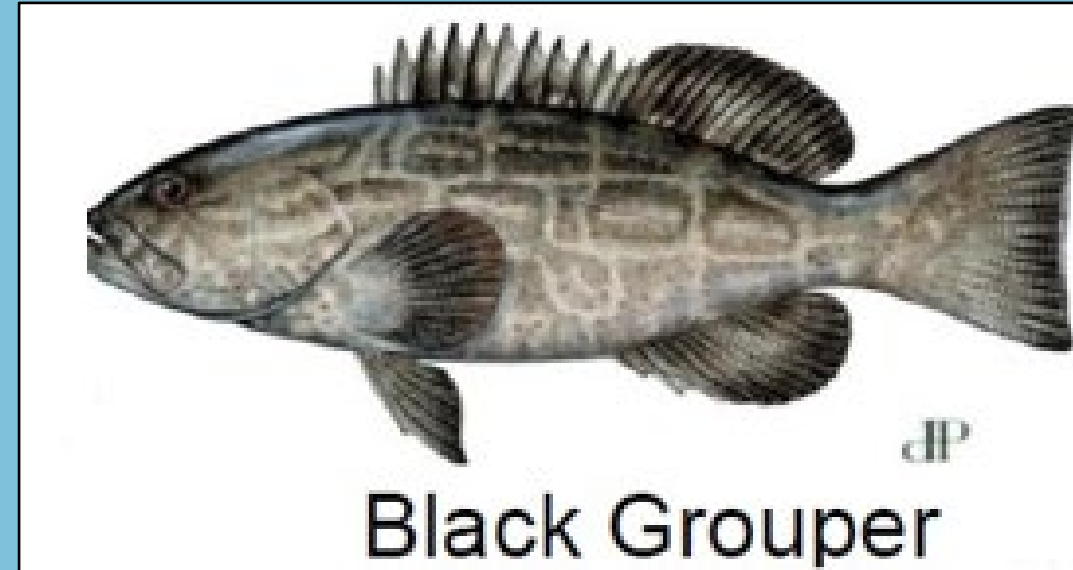
# Action 3: Simulating Black Grouper Complex Recreational Landings (Appendix D)



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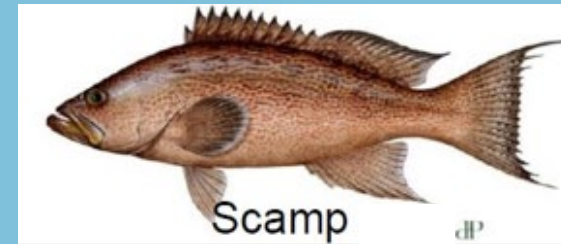
## Simulation Analysis Results

- ❖ Simulations suggest there is very low probability that Black Grouper Complex recreational landings will exceed the recreational ACL considered in Action 2
- ❖ In no simulation did Black Grouper Complex recreational landings ever exceed the complex ACL
- ❖ Potential revisit of language in Alternatives 2 and 3 would provide staff some further direction.



# Timing for Amendment 58A

- SEDAR 68 was completed nearly 3 years ago
- New catch limits for scamp/yellowmouth are necessary to be consistent with BSIA and prevent the probability of exceeding a sustainable harvest given the recommended reduction in catch advice for the new Scamp Complex
- Action 1.2 will require further analysis and the document would go final in April at the earliest
- All other Actions have the necessary analysis and would be ready for final action consideration at the January meeting





**QUESTIONS?**