

Subject: Request for Input by July 1: Procedural Guidance for Changing Assessed Stock Status from Known to Unknown

Date: Thursday July 2, 2020

From: NPFMC SSC

To: Jennifer Wallace, Stephanie Hunt and Regina Spallone

The North Pacific Fishery Management Council's (NPFMC's) Scientific and Statistical Committee (SSC) reviewed "*NMFS Procedural Guidance for Changing Assessed Stock Status from Known to Unknown*". This document describes proposed procedural changes to the required status determination decisions under section 304(e) of the Magnuson-Stevens Fishery Conservation and Management Act (MSA). The document identifies four case studies wherein a change in stock status from a "known" to "unknown" status is warranted, and includes recommended approaches for addressing each scenario.

The proposed procedures identified for scenario "*A*" *Changes to Management Units* are consistent with NPFMC procedures. The examples for this scenario highlight circumstances when the spatial stock structure changes or when an indicator stock is removed from a complex and information is insufficient to assess the status of the remaining stocks in the complex. The NPFMC has removed indicator species from a complex when evidence is sufficient to suggest that one member of the complex is being targeted. In most cases, there is sufficient information within the tier system to make a status determination for the remaining members of the complex. Similarly, the NPFMC has split stocks spatially, based on a revised understanding of stock structure. The two options provide a way for the NPFMC to proceed in these cases, consistent with past practices.

Aging Stock Assessments (scenario "*B*") are not likely to occur for the stocks managed by the NPFMC. During the stock prioritization process, the NPFMC recommended that all managed stocks and stock complexes are assessed at least every 4 years. Many stocks are assessed every year or every other year. Thus, it is unlikely that this scenario would occur in our regions. However, the proposed procedures seem reasonable if this scenario did occur.

The proposed procedures for scenario "*C*" *Stock Assessment Does Not Provide Sufficient Information to Support a Stock Status Recommendation* are consistent with existing NPFMC procedures. Stock assessment authors typically provide an updated version of the previously accepted assessment model (a "continuity" run), or an assessment at the next lower tier. Therefore, sufficient information is typically provided to make a status determination that is aligned with the SDC defined in the FMP. It should be noted that while a determination of whether or not overfishing is occurring will be possible for all tiers used in the groundfish and

crab FMPs, moving a stock or stock complex into a tier for which an estimate of, nor a proxy for, B_{MSY} are available may eliminate the possibility that an overfished determination can be made.

With respect to the three sub-cases for scenario C, the NPFMC notes that the guidelines for preparation of the Stock Assessment Fishery Evaluation (SAFE) reports include a requirement for “continuity runs” where the last accepted model is updated with new data. Therefore, proposed approaches to circumstances envisioned under case C.1 are consistent with existing procedures. Scenario C.2 identifies a case when the assessment model is updated with only new data, and the update is rejected, and the alternative is to use the previously accepted assessment without the new data. Scenario C.2 type cases are rarely encountered by the NPFMC. The NPFMC’s tier system normally allows for status determinations using alternative data should this occur. Under the rare circumstance when status could not be determined based on an alternative tier, the proposed procedure for using qualitative information to assess status relative to the overfished designation are reasonable in the short-term (1 year). However, the use of qualitative assessments of stock status for continuation of an overfished designation across multiple years is not recommended. Cases when the proposed new models, the current model updated with new data, and the previous assessment without new data are all rejected are also rarely encountered by the NPFMC (scenarios C.3). The proposed procedure is reasonable when, under rare circumstances, status determinations could not be based on an existing tier.

Scenario *D* addresses the circumstance when the *Stock Assessment Deviates from SDC Specified in the FMP*. This circumstance has not been encountered by the NPFMC. The only circumstance where SDCs may change within the same Tier is the lowest tier 6, where different catch-scalar approaches may be used, but this is allowed under the FMP SDC. The procedures for addressing this circumstance, should it arise for the NPFMC, are reasonable.