

2025 POLLOCK TRAWL EM INCENTIVE PLAN AGREEMENT

Vessel Operator Handout

Objective: The Trawl EM Incentive Plan Agreement (TEM IPA) is required by regulation for all Trawl EM vessels operating in the Gulf of Alaska (GOA). During the Trawl EM EFP it was known as the “Performance Standard for GOA Pollock Trip Limit and GOA MRAs”. Due to the Maximum Retention requirement of the Trawl EM program, vessels operating in TEM are exempt from the GOA pollock trip limit and GOA MRA regulations. The goal of the IPA is to control behavior so that vessels continue to operate under the intent of the regulations, yet provide the added flexibility that is needed due to the full retention requirement of TEM. This document specifically provides information for Vessel Operators so they understand how to function under the 2025 Agreement that their vessel is signed onto.

Overage Monetary Surrender: All participating EM EFP vessels will be required to surrender the ex-vessel value above the prescribed limits (GOA 300,000 pollock average 4-trip limit and GOA maximum retainable amounts as published in CFR Table 10). Processors will be allowed to process the overages and sell the product but vessels will be responsible for remitting any fines/overage proceeds to the non-profit managing this IPA.

Note: A Frequently Asked Questions section starts on Page 3 with example scenarios to help you better understand the IPA.

IPA Representative: Chelsae Radell, Alaska Groundfish Data Bank

GOA POLLOCK TRIP LIMIT OVERAGES

All EM GOA Pollock trips will be assessed towards the IPA as follows:

1. A 4-Trip Pollock average will be taken over the course of the year. How that average is calculated depends on your vessel LOA to ensure compliance with both parts of the GOA Pollock Trip limit rule (see below).
2. 4-Trip Averages over 300,000 pounds will constitute an offense resulting in abandonment of proceeds from the overage.
3. Any egregious trip overage ($\geq 335,000$ pounds) will constitute an offense regardless of circumstances plus abandonment of proceeds from the overage.
4. All offenses, both 4 trip average overages and egregious overages, are additive and counted together. (ex: 1 trip average overage plus one egregious overage equals two total offenses). The Offense and Fine Schedule in Table 1 applies to both types of offenses.
5. Adherence to the IPA will be assessed after A Season; any “hanging” trips not included in a 4 trip average at the end of A season will be carried over and included in the first 4 trip average of the B season. The four trip average restarts every calendar year.
6. Vessels will be allowed up to four (4) offenses annually. More than four offenses would be referred to NMFS who may factor IPA compliance into their decision to approve the vessel into the TEM program in future years.

4 Trip Average Calculations for Vessels greater than 60 feet:

- Every 4 pollock trips will be averaged over the course of the year, excluding any egregious overages.
- If the average catch over four consecutive trips is above 300,000 pounds, the vessel will be charged with an offense and fined according to Table 1.
- Since vessels are already getting the flexibility of a 4 trip average, there is not any grace for 4 trip averages between 300,000 lbs and 301,000 lbs.
- The calculation of trip average restarts after every 4 consecutive trips, excluding egregious overages.
- If a vessel greater than 60 ft delivers to a processor twice in one calendar day, then both trips are included as normal in their 4 trip average since this is typically a rare occurrence.

4 Trip Average Calculations for Vessels less than 60 feet:

- The hold capacity of vessels <60 ft in length automatically guarantees that a typical 4 trip average would be under 300,000 pounds, so every trip is not included in a 4 trip average like it is for larger vessels. However, the IPA must still apply to EM vessels <60 ft in length for the “calendar day” part of the regulatory exemption.
- For any calendar day in which there is more than one EM pollock landing by an EM vessel to a tender or processor, the total amount of pollock delivered within that calendar day will be calculated. In the rare occurrence that 3 or more tender deliveries occur in a single day, a total will still be taken for all trips in that calendar day. In those instances, there may be more than 4 trips included in the average.
- A 4 trip (or more) average will be calculated by taking the average of two consecutive calendar day totals (*only for days in which there was more than one EM pollock landing*).
- If the **average catch over four (or more) consecutive trips on two calendar days** is above 300,000 pounds, the vessel will be charged with an offense and fined according to Table 1.
- Any day in which there is only one landing of pollock that trip is ignored and is not included in any averages.

Table 1. GOA Pollock Trip Limit Offense and Fine Schedule

Trip Limit Overage Offense	Fine
1 st Overage Offense	Abandonment of proceeds plus \$750 fine
2 nd Overage Offense	Abandonment of proceeds plus \$1,500 fine
3 rd Overage Offense	Abandonment of proceeds plus \$2,000 fine
4 th Overage Offense	Abandonment of proceeds plus \$2,500 fine

GOA MRA OVERAGES

All TEM GOA Pollock trips will be assessed towards the IPA as follows:

1. MRA Overages will be assessed at the end of A Season and again at the end of B Season. Overages and offenses are cumulative throughout the year.
2. MRA Overages and offenses are not carried over from year to year; in January each vessel gets a clean slate.
3. MRA Overages will be assessed for all GOA pollock trips according to Table 10 of the CFR - GOA Retainable Percentages.
4. AGDB will monitor incidental catch of the pelagic pollock fleets in the WGOA and CGOA independently to determine if incidental catch of a particular species between EM and Non-EM (discarded catch and retained catch) is problematic for all or most fishery participants in that area. If the data shows there is a fishery problem overall for that area and NMFS is in agreement, then EM vessels will only have to forfeit overage proceeds >\$250, but overages for that species will not count towards offenses or fines.
5. For all other MRA overages (when it is not a fishery-wide problem), overages will be counted towards offenses and the Fine Schedule in Table 2.

Table 2. Actions for GOA Overage Offenses

MRA OFFENSE	ABANDONMENT OF PROCEEDS	FINE
1st Offense & 2nd Offense	Yes, for each overage valued >\$250	None
3rd Offense	Yes, for each overage valued >\$250	\$1,000 fine
4th Offense	Yes, for each overage valued >\$250	\$1,500 fine
5th Offense	Yes, for each overage valued >\$250	\$2,000 fine

IPA FREQUENTLY ASKED QUESTIONS (FAQ)

General Questions

Q: When do MRA or Trip Limit Overage Invoices get sent out?

A: The database of all EM Landings for the GOA will be sent to the IPA representative after the GOA has closed for the season. Invoices for A season are typically sent out in late May - June. Invoices for B season are sent out in late November - December.

Q: How do I pay my crew if it takes so long for EM overage invoices to be sent out?

A: All MRA and Trip Limit Overages should still be marked on your fish ticket. We calculate MRA overages the same way as NMFS/eLandings and the forfeiture amount we end up invoicing you should be the same as is marked on your fish ticket. You can keep track of your crews overages towards the offenses in Table 1 & 2 and withhold fines if necessary. If we determine that overages for a particular species were a fishery-wide problem, you can always return the money in a retro later.

For trip limits, it's a little trickier since it is a 4-trip average and the amount on the fish ticket is not going to be the amount on your overage invoice (except for trips >335K). AGDB has spreadsheet templates available for both MRA and GOA pollock trip limit overages to help you calculate them during the season. Feel free to reach out to Chelsae at cradell@alaskagroundfish.org to get a template or ask additional questions.

MRA OVERAGES

Q: Why do I still have to forfeit the value of an MRA overage >\$250 if it was a fishery-wide problem?

A: Even though the IPA gives us the flexibility and discretion to determine when there is an ecosystem problem, like abundance of a particular species that makes it difficult to avoid, we still need to comply with the component of the regulation that says you can not benefit from an MRA overage. This is the same action that would occur if the vessel was non-EM.

Q: If I was only paid for part of my MRA overage, how come the amount I owe includes all of the MRA overage pounds?

A: MRA's are Maximum Retainable Amounts and even though the EM program requires maximum retention of species, the goal of the IPA is still to prevent changes in behavior that would increase the amount of non-target catch that a boat brings in to deliver. Because of this, you still have to pay for the entire overage amount, but if you didn't get paid for all of it, the price per pound changes to reflect that. For example (see screenshot on next page):

- 101,285 round pounds of POP was delivered, and 24,690 lbs of the POP was sold at \$0.015 which is an ex-vessel value of \$370.35.
- When you take the Ex-vessel Value of \$370.35 divided by the total round pounds of Rockfish Delivered (101,285) it gives you an adjusted price per pound of \$0.0037. This is the price per pound value of all the rockfish delivered.
- Since the vessel caught 101,285 lbs of rockfish, the 5% Aggregated Rockfish MRA only allowed 28,050 pounds making the Overage Pounds 73,235 lbs.
- The adjusted price per pound value of all the rockfish delivered (\$0.0037 in this example) is multiplied by the overage pounds to give you \$267.79. That's the value of the overage. Since it's >\$250 it has to be paid back to the nonprofit managing the IPA.

Species	Round Lbs	Sold Wt	\$/LB	Ex-Vessel Value
POLLOCK	560,993			
POP	101,285	24,690	\$0.015	\$370.35
TOTAL RF	101,285	24,690	\$0.0037	\$370.35
% ROCKFISH	18%			
5% ALLOWED IN LBS	28,050			
OVERAGE	73,235	-	\$0.0037	\$267.79
			Landing Tax (1.075%)	\$2.88
			Observer Fee (1.65%)	\$4.42
			Total \$ to NPF	\$260.49

GOA POLLOCK TRIP LIMIT OVERAGES

Q: I still don't understand how overages are calculated. Does my egregious overage get calculated in my 4 trip average?

A: No, it does not. See below for an example. The vessel has one hanging trip from A season that is included in their first, 4-trip average. The 2nd trip is on 9/4. But then the vessel catches 343,337 lbs of pollock on 9/5. This is automatically an egregious overage with value forfeited and a fine, and is therefore not included in the average. The trips on 9/7 and 9/10 make up the rest of the 4 trip average of 297,065 pollock lbs.

Landing Date	Pollock Lbs	4 Trip Average	Notes
3/28/2023	278,456		Last "Hanging Trip" from A Season is included in first average of B Season
9/4/2023	299,123		
9/5/2023	343,337	-	Egregious overage >335,000 is not included in 4-trip average calculation
9/7/2023	303,476		
9/10/2023	307,203	297,065	4-trip average is beneath 300,000 and in compliance with performance standard, even though two trips in the average were over 300,000 pounds
9/12/2023	296,253		
9/14/2023	295,901		
9/18/2023	318,981		
9/22/2023	323,847	308,746	4-trip average is above 300,000 and counts as an offense.
9/24/2023	297,402		
9/27/2023	310,108		
10/1/2023	284,123		
10/2/2023	296,111	296,936	4-trip average is below 300,000 and is in compliance with performance standard. Even though the vessel had a trip of 310,000 pounds they were able to catch less on the next two trips to ensure they remained below 300K on average.

Q: My vessel is <60 ft and the trip limit IPA has never applied to me before. How are you calculating our 4 trip averages?

A: See example below. On 9/2 there were two pollock landings which made a "Calendar Day Total" of 281,668, and on 9/4 there were two pollock landings which added together to make a second "Calendar Day Total" of 306,900. Those two Calendar Day Totals are then averaged together and give a 4 trip average calculation of 294,284 lbs. Even though the second calendar day total was over 300,000, when averaged, the 4 trips are 294,284 lbs so the vessel is in compliance with the IPA.

However, on 9/8 the vessels' two pollock lbs made a calendar day total of 337,086, which is above the egregious limit of 335,000 lbs. This is an automatic offense and is not averaged with the other trips; the 37,086 overage pounds value is forfeited and a fine applied. On 9/9 and 9/10 the Calendar Day totals average out to be above 300,000 lbs. The value of the 17,731 lbs overage is forfeited and a fine is applied.

Landing ID	Landing Date	Pollock Lbs	Calendar Day Total	Average Calculation	Notes
1234456	9/1/2023	159,234	-	-	This trip was the only trip on 9/1 and is ignored completely.
1234457	9/2/2023	123,466	281,668	294,284	Even though one day was over 300,000, the average was not over 300,000 so this complies with the performance standard and there is nothing to forfeit.
1234458	9/2/2023	158,202			
1234459	9/4/2023	147,247	306,900		
1234460	9/4/2023	159,653			
1434461	9/5/2023	123,456	-	-	This was the only trip on 9/5 and is ignored completely.
1434462	9/6/2023	158,233	-	-	This was the only trip on 9/6 and is ignored completely.
1434463	9/8/2023	172,963	337,086	Egregious Overage, so automatic offense. No overage calculation.	
1434464	9/8/2023	164,123			
1434465	9/9/2023	169,246	328,492	317,731	Value over 300,000 lbs forfeited.
1434466	9/9/2023	159,246			
1434467	9/10/2023	147,123	306,969		
1434468	9/10/2023	159,846			

Q: My processing plant made a mistake and gave me two fish tickets with the same delivery day, even though the second delivery finished after midnight on the following calendar day.

A: Reach out to your processing plant as soon as you notice to have the issue corrected. The landing date on the fish ticket should always be the day the delivery ends. This is important for a lot of reasons (including matching with shoreside observer data), but for the IPA it's really important to make sure your averages are calculated correctly. This is also why we wait until the season has closed before calculating overage invoices, which gives time for eLandings errors to be corrected.

Q: Will I still get Summary Settlements from NMFS Office of Law Enforcement about Trip Limits and MRA Overages?

A: No, you should not get Summary Settlements from OLE about either type of overages on any trips logged in the Trawl EM category. However, you may still get them on trips outside of Trawl EM (ex: cod trips). If you get a Summary Settlement for overages on a TEM trip, your fish ticket is likely not coded correctly and/or you logged a trip wrong in ODDS. Contact the IPA Manager immediately so the source of the issue can be determined and do not pay enforcement fines for overages on Trawl EM trips. To prevent issues like this from occurring, if you're on a pelagic pollock trip and required to use EM, you should write TEM on your logbook pages and also check EVERY fish ticket to make sure it is coded correctly. If that trip was EM, you should always see TEM below OA in the upper right corner of your ticket:

Crew Size	4	Mgmt Pgm	OA
Observers onboard	0	ID	
		Mgt Pgm Mod	TEM