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Accountability Measures (AMs) for Pelagic Stocks under the Island-based Fishery Management Plans

Draft Options Paper

María López-Mercer, NMFS SERO
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Recap from August 2025 CFMC Meeting

AM Triggers and Corrective Actions

- Compared pelagic AMs with reef fish AMs.
- AM corrective actions are undefined when an annual catch target (ACT) or annual catch limit (ACL) is exceeded.
- Reviewed Magnuson-Stevens Act requirements for ACLs and AMs.
- Discussed replacing the ACT with the ACL as the pelagic AM trigger.

New Measures & Potential Options

- Discussed how new dolphin/wahoo size limits might help maintain harvest below ACT/ACL.
- Explored adjusting triggers and corrective actions, such as seasonal closures and size limit changes.

Challenges & Potential Approach

- Discussed AM corrective action challenges due to seasonality and low ACLs.
- Explored how the *matrix* process could improve federal management and ACL data.
- Agreed that AMs must be biologically appropriate for each species.

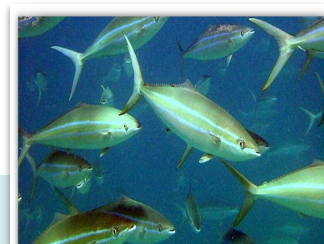
Recap from December 2025 CFMC Meeting

Discussion

- Presented preliminary options for 2 actions
 - 1) Trigger modification
 - a) Replace ACT with ACL as the trigger
 - b) Consider BSIA to determine if corrective action is needed.
 - 2) AM Corrective Action: e.g., Seasonal closures; trip limits, bag limits, size limits, other
- Flexibility of management tools, data validity, and catch limit impact.
- Increase focus on AM trigger
- Effects of different corrective actions.

Next Steps

- Include a detailed comparison of all options.
- Review the species matrix to determine if certain species should be removed from federal management or managed differently.
- Refine Options



Current Accountability Measures Applicable to Pelagic Stocks (all islands, all sectors)

The AM would be triggered if the applicable landings (e.g., sector landings, as available) exceed the applicable ACT for that stock/stock complex. If NMFS estimates that landings have exceeded the applicable ACT for a stock or stock complex, NMFS in consultation with the Council will determine appropriate corrective action.

- For Puerto Rico - when landings for one sector are not available for comparison to that sector's ACL and ACT, the ACL and ACT for the sector with available landings are the ACL and ACT for the stock or stock complex.

Current Annual Catch Monitoring Process (all islands, all sectors)

Step 1. As soon as landings are available each year, Southeast Regional Office (SERO) staff compares each pelagic stock/stock complex's landings to the applicable ACT.

- If landings $<$ ACT, then no further action is required.
- If landings $>$ ACT, then NMFS notifies the Council of the overage.

Step 2. Although not required by the AM, SERO staff sends a summary memo listing those pelagic stocks with ACT/ACL overages to the Southeast Fisheries Science Center (SEFSC) for review.

Step 3. NMFS and the Council discuss and determine appropriate corrective action.

Why is the Council Proposing to Modify Pelagic AMs

- Multiple pelagic species exceeded ACT and ACL limits within the first three years of federal management, triggering the need for NMFS and the Council to discuss and determine appropriate corrective actions.
- Current regulations do not specify AM corrective actions and the existing requirement for NMFS-Council consultation prevents timely implementation of corrective measures.
- Delays in landings data prevent in-season responses to ACT overages, necessitating a review of whether the ACT remains an effective management buffer.

Modifying Pelagic AMs

Goal: Due to their pelagic nature, develop a trigger that adequately accounts for expected variability in catch rates, and to explore actions that would effectively correct ACL overages.

- Proposed Action 1: Modify the AM trigger to provide greater confidence that corrective action is required.
- Proposed Action 2: Define one or more corrective actions that could be implemented to confidently constrain catches in those instances where ACLs for pelagic species are exceeded and corrective action is needed.

Modifying Pelagic AMs

Goal: Due to their pelagic nature, develop a trigger that adequately accounts for expected variability in catch rates, and to explore actions that would effectively correct ACL overages.

Specific corrective actions should meet the following criteria:

- Minimize socio-economic impacts on both commercial and recreational fishers as much as possible.
- Effectively constrain catch to prevent future exceedances
- Measures should be enforceable using currently available resources and not administratively burdensome or complex to ensure effective regulatory implementation.

Proposed Action 1: Modify the AM trigger

Option 1 (No action): Retain Current AM trigger: Evaluate landings relative to the applicable ACT based on a moving multi-year average of landings, as described in the FMP. If NMFS estimates that landings have exceeded the applicable ACT, NMFS in consultation with the Council will determine appropriate corrective action.

Option 2: Evaluate landings relative to the applicable ACL based on a moving three-year average of landings. If average landings, as estimated by NMFS, exceed the ACL, apply the AM.

Option 3: Evaluate landings relative to the applicable ACL based on a moving three-year average of landings. If average landings, as estimated by NMFS, exceed the ACL, NMFS will consider landings trends and any other best scientific information available (BSIA) in determining if corrective action is necessary to prevent another overage.

Summary of Potential Options for Action 1

Option	Monitoring Basis	Pros	Cons
1.No Action	Annual Catch Target (ACT)	No administrative changes; Flexibility for case-specific corrective actions	Monitoring based on ACT (not ACL) is ineffective; Delayed implementation of corrective actions.
2. Evaluate landings against ACL (No NMFS review)	Annual Catch Limit (ACL)	Monitoring based on ACL	Increased likelihood of mandatory corrective action due to lack of trend evaluation; Administrative changes needed.
3. Evaluate landings against ACL (With NMFS review)	Annual Catch Limit (ACL)	Monitoring based on ACL; Flexibility to consider additional data before triggering action; Flexibility for case-specific corrective actions.	Administrative changes needed; Delayed implementation of needed corrective actions.

Proposed Action 2: Specify AM Corrective Action

*Option could be selected for all species or vary by species.

Option 1 (No action): Retain the current AM, which does not specify a corrective action.

Option 2 (Seasonal Closure): In the year following a determination that the ACL has been exceeded and corrective action is necessary, reduce the fishing season for all sectors by the amount necessary to constrain catch to the ACL. Any fishing season reductions would apply only during the year following an ACL overage.

Sub-options (Fixed Start Date/Variable Duration): Implement a closure of variable length based on the overage amount, starting on a fixed date (e.g. end on Dec 31, end on Sep 30, start on Jan 1).

Proposed Action 2: Specify AM Corrective Action

Option 3 (Bag Limits and Trip Limits): Adjust or establish recreational daily bag limits and implement commercial trip limits (Dolphin/Wahoo in PR and/or USVI; all other species in PR) to constrain catch to the ACL following a determination. Any measures would apply only during the year following an ACL overage.

Sub-option 3a: Modify recreational bag limits and implement commercial trip limits for Dolphin and/or Wahoo (applicable to PR and USVI).

Sub-option 3b: Implement recreational bag limits and commercial trip limits for other pelagic species managed under the Puerto Rico FMP.



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Proposed Action 2: Specify AM Corrective Action

Option 4 (Size Limits): Adjust existing size limits or implement new ones to constrain catch to the ACL for the year following a determination. Any adjusted/implemented size limit would apply only during the year following an ACL overage.

Sub-option 4a: Modify size limits for dolphin and/or wahoo (for PR and USVI).

Sub-option 4b: Implement size limits for the pelagic species that do not currently have one (i.e., great barracuda, blackfin tuna, little tunny, king mackerel, cero mackerel, tripletail) (Puerto Rico only).

Summary of Corrective Action Options for Action 2

Criteria	Option 2: Seasonal Closure	Option 3a: Recreational Bag Limits	Option 3b (Cont.): Commercial Trip Limit	Option 4: Size Limits
Stock Protection	High (stops all mortality)	Low (limits harvest, increases discards)	Low (slows harvest only)	Low (only reduces undersized catch)
Data & Monitoring	None required	High (requires robust catch estimation)	High (requires real-time data)	High (requires ongoing length monitoring)
Socio-economic Impact	Lower impact (can be planned around)	High impacts (affects year-round value)	May affect market orders	Short term loss, long term gain
Enforcement	High (easy at-sea possession check)	Low (difficult dockside/at-sea check)	Low (difficult, requires port agents)	Requires dockside intercepts



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Next Steps

- Discussion on options presented
- Consider ongoing processes such as *Matrix* (stock evaluation) and new management measures for dolphin and wahoo for deciding when to further develop the action.
- If moving forward, IPT to develop an draft amendment/public hearing draft to the FMPs for Aug/Dec 2026 meetings.