

## Note about constraints on interannual change in TAC for the anchovy fishery

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OMP-08, the current management procedure used to recommend total allowable catches for sardine and anchovy and total allowable sardine bycatch in South African waters, includes a constraint on the maximum proportion by which the normal season anchovy TAC can be reduced annually. This is set at 0.25 and applies as long as the anchovy TAC in the previous year was below the two-tier threshold of 330 000t.

A suggestion was made at the PWG meeting on the 15<sup>th</sup> December 2011, when reviewing the anchovy TAC that had been recommended for the 2012 season, that consideration should be given to using the actual anchovy catch, and not the TAC, as the value to which the constraint on interannual change (a maximum decrease of 25% ) is applied. This was in reaction to the appreciable drop in anchovy biomass measured in November 2011 and associated concerns that the TAC as calculated by the OMP-08 formula was too high.

In considering this suggestion it is first important to be clear about the objectives regarding risk to the resource, risk to the industry and benefit the industry:

- i.) in terms of risk to the resource, the OMP already ensures that a certain agreed risk level is met;
- ii.) the minimum TAC is to lessen economic risk to the industry; and
- iii.) the constraints on inter-annual (particularly downward) TAC changes are to provide a benefit to the industry in regard to stability considerations.

Furthermore, one also needs to consider the implications of the TAC under-catch. It could mean that the resource is in greater trouble than surveys/assessments have indicated. If that is what the PWG decides that it believes at the time, then the WG is into territory where Exceptional Circumstances provisions apply, and these allow for further TAC reduction, and immediate OMP review.

Alternatively the under-catch arises from inadequate effort available to make the catch, possibly exacerbated by measures such as the area closures last year (2011) because of horse mackerel bycatch or in 2010 because of sardine bycatch. That though is no reason not to base the TAC on the agreed OMP formula basis to which the previous year's TAC is input, rather than that year's catch. The resource has already had a bonus, relative to where it would otherwise have been had the full TAC

been taken (which had been agreed, so catching all of it would not have raised questions). Why introduce further penalty on the industry in the following year by using the other approach to reduce the TAC further, and so effectively go even lower still than the accepted risk level?

Note that it is not that industry cannot accommodate a TAC decrease of more than 20%. They can - rather the rule is intended to protect them from greater variations to their detriment and no longer term advantage in terms of resource risk. Also consider what would happen if the PWG indeed wanted to change the rule to work off the previous year's catch rather than TAC. Assume that somehow the probability of this occurring and the associated magnitude could be modelled. This would have to be built into the OMP simulation testing, and average catch would drop for the current control parameter values; but then so would the risk drop below the agreed risk threshold. Thus the PWG would adjust the OMP control parameter values to give the same risk, hence adopting a less conservative rule which gives greater catches than under the present OMP in years following ones in which the TAC had not been under-caught. Therefore there would be no additional benefit to the resource from such a provision - and there is no need for it if the PWG continues to accept the current agreed risk threshold