The Groundfish Advisory Subpanel (GAP) reviewed options for a fishery management plan (FMP) amendment to address impacts of the American Fisheries Act (AFA). A majority of the GAP supported the following as preferred alternatives for public review. Our comments are based on the issues and analysis laid out in Exhibit C.9, Attachment 2. The majority GAP opinion reflects a presentation made by whiting fishermen and offshore processors.

**Issue 1 - Qualification and Subdivision**

**Question 1: Should AFA catcher vessel participation be limited?**

The majority of the GAP prefers Option 1.a, limit vessels by sector (at-sea, shore-side, non-whiting).

**Question 2: Should qualification require that a permit be held on a specific date?**

The GAP supports Option 1.a, no date requirement.

**Question 3: What landing requirement should be used?**

The qualifying landings must have occurred during the period of January 1, 1994 to September 16, 1999.

In regard to landing requirements, the GAP believes that one additional piece of analysis needs to be done in order to determine whether a 50 ton or a 500 ton requirement is most appropriate. The GAP requests that a simple analysis be done for vessels that qualify for non-whiting groundfish using the 50 ton criterion. The analysis should list: the length of the vessels qualified; the years that those vessels delivered non-whiting groundfish; the number of trips by each vessel per year during the qualifying period; and the poundage of non-whiting groundfish delivered per vessel per year. This will help determine if the 50 ton limit is sufficient to provide the protections required under the American Fisheries Act.

**Issue 2 - Catcher Vessel Restrictions**

The majority of the GAP supports Option 2.a, which requires issuance of a medallion. Vessels qualifying by virtue of having met landing requirements would be issued a medallion which restricts the vessel to participation in the sectors for which the vessel qualifies. Medallions would be transferable under the same conditions and restrictions as apply to limited entry permits. However, medallions would be transferable only as a whole. In other words, a vessel qualifying for more than one sector cannot subdivide its medallion among those sectors.

**Issue 3: Catcher - Processors**

The GAP supports Option 3.a

**Issue 4: Motherships**

The GAP supports option 4.a
Issue 5: Duration

The GAP supports Option 5.b

Issue 6: Appeals and Technical Amendment

The GAP supports Option 6.b and the technical amendments regarding permit review proposed by Council staff.

PFMC
09/13/01