Exhibit E.3.b
Supplemental EC Report
April 2002

ENFORCEMENT CONSULTANTS REPORT ON
INTERPRETATION OF FIXED GEAR SABLEFISH PERMIT STACKING PROVISIONS
(AMENDMENT 14)

Tracking of sablefish landings are dependent upon the state fishticket programs. Going into this 2002 fishing season, the state fishticket tracking systems are inadequate for tracking stacked permits either for purposes of enforcement monitoring and auditing, fisheries management, or recording individual permit histories. This situation will be further complicated through inseason permit transfers and next years proposed owner on board requirement.

At best, for this year, the state fishticket program can track individual and gross landings per vessel, poundage per individual vessel landing, and gross pounds per vessel. To accommodate stacked permits, state fishtickets programs will need to be modified to accommodate the tracking of up to three permits per vessel, and three permit owners per vessel, with the added provision of declaring what permit the landing is attributed to. In some landing situations, multiple permits will be required to accommodate the poundage of the landing. These are all significant changes to the current status quo and should not be assumed as just a matter of changing reporting requirements, but will require significant changes to the state fishticket infrastructure.

In the case of permit transfers during the primary season, the individual relinquishing the permit should be required to provide landing history to NMFS and the receiving party for the purposes of documenting the inseason landing history of that permit. Disclosure of all inseason landing documents is necessary to prevent fraudulent activity.

Applications for permits/permit transfers should include a statement advising applicants:

"It is a violation of federal criminal law to give false or incomplete information."

In addition, permits should contain the following information:

1. Owner(s) Name and Address
2. Vessel Name and Document Number
3. Effective Date of Transfer
4. Permit With Grandfathered Owners Identified (If Applicable)
5. Tier Assignment
6. In the Case of Transfer, The Identification of Previous Vessel Permit Assignment for that Fishing Year

PFMC
04/10/02