GROUNDFISH ADVISORY SUBPANEL REPORT ON AMENDMENT 18 (BYCATCH)

The Groundfish Advisory Subpanel (GAP) has the following comments on language related to Amendment 18 contained in Agenda Item F.3.a, Attachment 1.

1. Page 39, Section 6.3.2. **Sector-specific and Vessel-specific Total Catch Limit Programs.** To create vessel specific limits, sectors will have to be limited first.
2. Page 45, Section 6.6.2. **Recreational Fisheries.** This lacks a good definition of rod and reel fishing gear.
3. Electronic systems should be developed with or in spite of essential fish habitat needs. GAP views the electronic monitoring systems as a useful tool to mitigate costs in the observer program and as an aid in the implementation of a full retention fishery.
4. The GAP agrees with the Groundfish Management Team (GMT), that budgets and existing staff responsibilities need to be considered when crafting regulatory requirements. Efforts to mitigate bycatch have to take expenses and Council work loads into account.
5. Finally, the GAP supports the Council moving forward with consideration of the trawl individual quota program which would provide for 100% validation of catch, and provide excellent bycatch mitigation.
6. The GAP fully agrees with the GMT report with respect to section 6.4.1.1, and so would like the Council to carefully consider this section in their deliberations.

PFMC
09/21/05