ENFORCEMENT REPORT ON INCIDENTAL 2009 CATCH REGULATIONS IN THE
SALMON TROLL AND FIXED GEAR SABLEFISH FISHERIES

Upon review of the incidental catch regulation options for the 2009 salmon troll and fixed gear
sablefish fisheries by the Enforcement Consultants (EC), two concerns surfaced. As written, the
situation summary Agenda Item I.1.b, halibut to salmon or halibut to sablefish ratio options
could only be enforced upon offloading of the catch shoreside. The same is true with regard to
total landing limits (e.g. 35 halibut landed per salmon troll trip). This approach could result in
the targeting of halibut and eliminates our ability to enforce limits during an at-sea compliance
boarding. If the intent is to ensure halibut catches are truly incidental to directed fishing for
sablefish and salmon, it is our recommendation the words “land” or “landed” be replaced with
“possession” or “possession onboard whenever you consider ratio fisheries.”

If the Council agrees that incidental halibut catch regulations should be enforced from a
“possession” versus “landing” perspective, simplifying what can be possessed is valuable if at-
sea enforcement is to be effective. Of the options presented for the sablefish fishery North of
Point Chehalis, Option 1 is much more straightforward than Option 2. While the EC is not
weighing in on the amounts of halibut that should be allowed, we do wish to point out that total
pounds or number of halibut allowed is much easier to enforce at-sea than “poundage” ratios,
particularly where large amounts of target fish may be concerned. For example, instead of 17
pounds of halibut per 1,000 pounds of sablefish, translate that to a set number of halibut to
sablefish (preferred) or total pounds of halibut allowed in possession.

PFMC
04/06/09