

GROUND FISH ADVISORY SUBPANEL REPORT ON
TRAWL RATIONALIZATION TRAILING ACTIONS

Mr. Jim Seger briefed the Groundfish Advisory Subpanel (GAP) on the status of trawl rationalization trailing actions. The GAP offers the following comments and recommendations.

Adaptive Management Program (AMP) – The GAP reviewed the alternatives for pass-through of adaptive management quota pounds and recommends a modification to alternative two. Specifically, the GAP recommends that the pass-through procedures used since 2011 be continued until procedures are developed under the AMP, as per alternative two, with the additional recommendation that no development of AMP procedures occur before the five-year review. As we have highlighted in previous statements, there are many much more pressing and less time intensive trailing amendments that could help streamline and improve the catch share program.

Whiting season start date – Modifying the whiting season start date, and providing opportunities for non-whiting midwater fishing earlier in the year are both major priorities for the GAP. The GAP believes that under a rationalized fishery fishermen should be allowed to fish at any time during the year, provided they have the quota to cover their catch. This is particularly true now as costs mount in the fishery and opportunities to generate additional revenue, like modifying opening dates, seem to move forward very slowly. On the other hand, trailing amendments that place additional burdens on the fleet, like cost recovery, have no difficulty moving through the process.

The GAP reviewed the NMFS report (Agenda Item D.1.b, Supplemental NMFS Report, March 2014) and appreciates that the agency feels a clean-up rule is needed before moving forward on modifying the whiting season start date. While the GAP struggled to understand all of the nuances, the GAP supports that approach if NMFS is confident it can complete the clean-up and the start date modification before the 2015 whiting opener. The GAP requests a determination of whether that is possible by April, so we can revisit and prioritize appropriately.

Observer/Catch monitor proposed rule – The GAP reviewed the proposed rule and supports removing the current requirement that observers providing coverage on the West Coast be certified to provide coverage in the North Pacific groundfish fishery. That requirement may limit the available number of West Coast providers thereby limiting competition and driving up costs. In the proposed rule, NMFS states their intent to expand conflict of interest limitations for observer and catch monitor providers. Moreover, the proposed rule indicates that NMFS appears intent on developing these limitations without Council guidance outside of this rulemaking process. This concerns the GAP. The current conflict of interest provisions were developed by the Council to help facilitate procurement of observers. A central point of the proposed rule also is about facilitating procurement of observers by expanding the pool of observer providers on the West Coast. Therefore, it seems counter-intuitive for NMFS to suggest the need for additional constraints on observer providers that will hinder procurement of observers. Further, during the original deeming of amendment 20, the Regulatory Deeming Workgroup specifically rejected the more expansive conflict of interest language that NMFS initially proposed and at that time

NMFS agreed to go with the narrowed language which is currently in regulation. The GAP recommends that the conflict of interest provisions should not be expanded beyond those originally developed by the Council.

PFMC
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