

## GROUND FISH ADVISORY SUBPANEL REPORT ON FEDERAL ENFORCEMENT PRIORITIES AND OTHER ENFORCEMENT ISSUES

The Groundfish Advisory Subpanel (GAP) heard presentations from Ms. Martina Sagapolu and Mr. Bill Giles about enforcement priorities for the coming year.

While the GAP understands the National Marine Fisheries Service (NMFS) Office of Law Enforcement (OLE) enforcement priorities had not changed dramatically from 2012, GAP members offer comments about two issues of particular concern.

### **Trawl rationalization issues**

GAP members note that under a rationalized system, less enforcement is needed in the field and that OLE should consider concentrating more of its efforts on tracking data issues and problems. OLE's own data supports this. The numbers of enforcement incidents related to the trawl rationalization and vessel monitoring system (VMS) programs have steadily and significantly declined in both the Northwest and Southwest Divisions over the past three years (see Page 4 of [Supplemental NMFS Report](#) under this agenda item) and the fleet should be commended.

The rationalized trawl program is now more efficient; it also operates under a more cooperative strategy between the industry and NMFS. Examining differences or glitches in data may be simply resolved by calling the fleet or co-op manager instead of boarding a vessel at sea. Increasing technological advances in communications and data analysis make these resolutions commonplace.

Besides being a fundamental shift in the way the fishery is prosecuted, the rationalization program also represents a fundamental shift in the way enforcement procedures are carried out.

We understand NMFS OLE is in the process of hiring people to help agents with data review but that it's a slow process. Therefore, the GAP recommends that expediting hiring be a priority, not only for NMFS OLE, but for the agency departments responsible for making this change happen.

Our other concern related to the trawl rationalization program pertains to cost recovery: it is imperative the OLE budgets do not depend on the trawl program to cover the cost of hiring personnel or allow personnel hours that are not strictly related to the trawl rationalization program. We need to keep the costs as low as possible to make this program work and not put undue burdens on the industry.

### **Poaching south of Pt. Conception**

The GAP suggests the Southwest Division prioritize enforcement of poaching south of Pt. Conception. The GAP was informed that poaching is a problem in this area.

Poaching, whether by the sport or commercial sector, creates a negative perception of the fishing industry as a whole, the management process and enforcement, while harming the long-term health of specific stocks and of the fishery.