

GROUND FISH ADVISORY SUBPANEL REPORT ON FINAL EXEMPTED FISHING  
PERMIT (EFP) APPROVAL FOR 2015-2016

The Groundfish Advisory Subpanel (GAP) was briefed by Mr. Brett Wiedoff on four Exempted Fishing Permits (EFP) for electronic monitoring (EM), as well as an additional EFP for yellowtail rockfish jig fishing off California. The GAP supports final approval for all five EFPs. Specific comments and recommendations are provided below.

As we mentioned in our F.2 statement on the electronic monitoring regulatory process, and in previous statements on EM EFPs, the GAP believes EM is a major priority and could prove critical to the long-term success and durability of the groundfish trawl catch share program. To reiterate our previous statements, costs of participating in the individual fishing quota program are high and growing, access to target stocks remains low, and many trailing amendments that could reduce cost or increase profitability have yet to be implemented. Moving forward with EM EFPs could provide relief for a small subset of the fleet, and should provide valuable information for the EM regulatory process, which we believe will ultimately reduce some of the cost burden and provide additional operational flexibility.

The GAP discussed several overarching issues that pertain to all of the EM EFPs. The first was compliance monitoring and what level of coverage should be required in addition to EM. The GAP believes that there is a great deal of confusion around this topic. While some level of observer coverage will always be required for biological sampling purposes, that should be a National Marine Fisheries Service (NMFS) West Coast Groundfish Observers Program decision and should not be part of this discussion.

Generally speaking, the GAP believes that ongoing observer coverage for compliance monitoring purposes in addition to whatever level is needed for biological sampling will be detrimental to the utility and viability of the EFPs. It will add significant cost, and may serve to confuse the results. Further, it's not clear what purpose additional observer coverage would serve. If there is going to be additional observer coverage for compliance monitoring, the GAP believes everyone would benefit from a much clearer explanation of the rationale.

Similarly the GAP does not support any arbitrary limits on the number of participants for each EFP. Reducing the number of participants potentially increases the costs to each participant (less people to spread costs over) and this is contrary to the objectives for moving forward with EM.

Concerns about shoreside catch monitors have also been raised and discussed. As we explained in our statement on F.2, we believe there are several different options that should be explored, including models that utilize community members who can become certified by NMFS to act as catch monitors.

NMFS has been clear that they believe the EFPs are an important tool to help inform the regulatory process for EM. The GAP agrees and believes that the EFPs should all move forward and be implemented as soon as possible.

Finally, the GAP believes the yellowtail rockfish EFP is promising and should also move forward.