

GROUND FISH MANAGEMENT TEAM REPORT ON THE FIXED GEAR SABLEFISH CATCH SHARE PROGRAM REVIEW, INCLUDING FEDERAL ELECTRONIC FISH TICKETS FOR OPEN ACCESS SABLEFISH DELIVERIES

The Groundfish Management Team (GMT) received a presentation from Ms. Ariel Jacobs (National Marine Fisheries Service, West Coast Region) and Mr. Jim Seger (Council staff) on Phase I of the Fixed Gear Sablefish Catch Share Program Review ([Agenda Item F.6.a, Attachment 1](#)), including the potential actions by the Council on electronic fish tickets for sablefish landings and modifications to the own/control limit. Due to the complexity of ownership options, permit control considerations, and competing workload priorities at this meeting, the GMT did not have an opportunity to study and discuss the components of the program in detail; the GMT has no comments to offer on these topics at this time. Regarding the use of Federal electronic fish tickets and the findings of The Office of Inspector General's (OIG) report on National Oceanic and Atmospheric Administration (NOAA) catch share programs ([U.S. Dept. of Commerce 2014](#)), the GMT offers the following comments and observations.

Federal electronic fish tickets for the sablefish fishery

The GMT sees advantages to electronic fish tickets in improving the timeliness of landings data available for coastwide management, especially for inseason tracking of the sablefish fishery sectors, and supports their use should the Council recommend them as a tool to assist in more efficient fishery management. However, the GMT points out that management has been successful using paper fish tickets, as shown by our ability to track and monitor fishery impacts in relation to achieving harvest guidelines (HGs) and staying within annual catch limits (ACLs). The fixed gear sablefish fishery has remained below (but has approached) the non-trawl allocation in 17 of the past 18 years (Figure 1; excerpted from [Agenda Item F.6.a, Attachment 1, June 2014](#)), the one exception being 1997.

The GMT also discussed whether electronic tickets would reduce errors. Using electronic fish tickets may reduce some types of errors relative to fish tickets (e.g., transcription errors). However, we note that errors will undoubtedly continue to be made, whether this occurs when completing traditional paper landing receipts, punching numbers into an electronic device by first receivers, or through transcription and data entry errors further up the line. Electronic tickets can prevent some more obvious errors, where the entry should be limited to one or only a few specific possibilities, but is not expected to reduce transcription errors, etc.

The Office of Inspector General (OIG) report NOAA catch share programs

Ms. Jacob's presentation included excerpts from a recent report by Department of Commerce's Office of the Inspector General on catch share programs. Some on the GMT were surprised and puzzled by the following conclusion and provide comment to clarify potential misunderstandings:

“NOAA does not have adequate data and does not track or enforce landings overage violations in the Pacific Sablefish Permit Stacking Individual Fishing Quota (IFQ). NOAA currently does not monitor Pacific Sablefish landings on an individual permit basis during

a fishing season. Instead, it only monitors landings for the entire fishery as a whole, using a paper-based system that is subject to compromise and the multiple possibilities of error associated with any manual process. In addition, we identified 189 instances where actual landings exceeded the allowed landings for individual permits from 2008 through 2013."

Members of the GMT understand that the data exists to track and enforce landings overage violations. A number of violations and overages were presented in the OIG report that were based on these data, which suggests that the data we have now should be adequate to detect violations. The violations are also relatively minor in terms of the poundage involved. Of the 189 violations, 110 were over by an average of 30 lbs. Only 12 were over 1,000 lbs. We cannot double-check to see if their numbers are correct because their methods were not provided.

The report does not mention state enforcement activities, and the GMT wants to point out that some of the overages they found could have been cited by state enforcement instead of Federal enforcement. States actively track landings against individual tiers and cite violations. Several of us are also involved with Pacific Fishery Information Network (PacFIN) and have pointed out in the past few years that there are issues tracking tier landings across states. This is more of a coordination problem, and a problem regarding data that was being recorded (or not recorded) on fish tickets, rather than a data problem or a paper fish ticket problem (i.e., this situation could have occurred whether using paper or electronic fish tickets). The PacFIN database is adequate to track landings against permits.

Lastly, enforcement of the tiers and the incentives of the catch share program have served their ultimate purpose of keeping catch to target levels. And in the trip limit fisheries, management performance and enforcement have performed to expectations (Figure 1).

We fully agree that the data system could be improved, and that electronic fish tickets may provide for more timely access to data from all three states. However, many on the GMT strongly disagree with the point that the data are inadequate. And while electronic fish tickets would make the system easier to enforce, it will not make the system impervious to "compromise" and "errors." As we note above, quality control of fish tickets involves professional judgment/experience that cannot be replaced by fully electronic reporting.

We make these comments because the report's findings did not seem completely accurate, which might color the Council's view of urgency and management priorities. We do not agree with the view that the sablefish data issues are such that they question the very integrity of management. Given all the competing initiatives at play, the system can continue to function adequately without electronic fish tickets if the Council wishes to prioritize other matters over electronic fish tickets.

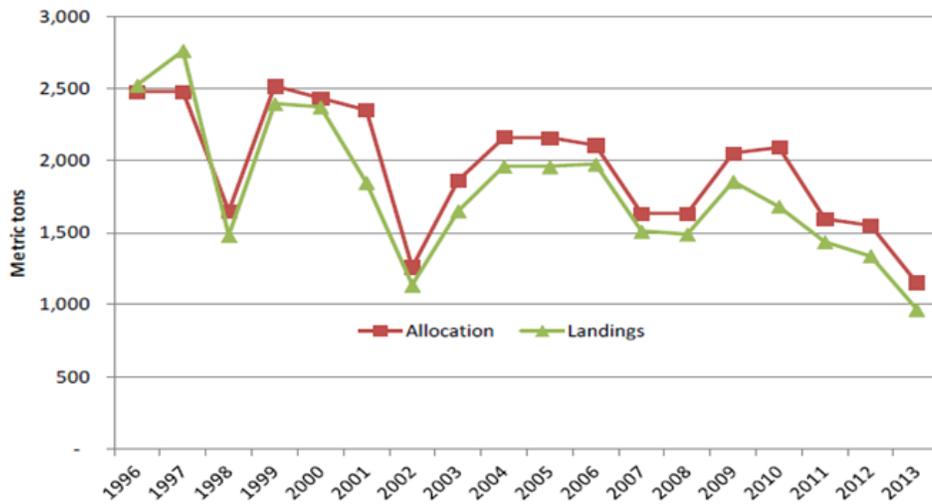


Figure 3-4. LEFG sablefish allocations and landings, 1996 through 2013. Years prior to 2002 include the mop-up and DTL fisheries, while years from 2002 to 2013 are for the primary season only.

Figure 1. Limited entry fixed gear sablefish allocations and landings, 1996 through 2013. Excerpt taken from [Agenda Item F.6.a, Attachment 1, June 2014](#).

PFMC
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