

ENFORCEMENT CONSULTANTS REPORT ON  
SABLEFISH PERMIT STACKING PROGRAM REVIEW

For the Enforcement Consultants (EC), our number one concern for this fishery is catch accounting. Under the current system, when a sablefish fixed gear tier delivery is made, the delivery by regulation is recorded on a state fish ticket. One to three tiers may be delivered and recorded on this one trip ticket. If not specified by the operator, the delivery is apportioned to the individual tiers (up to 3) by an even split until the tiers are reduced to a point where they are equal to or less than the daily-trip limits (DTL). All of this tabulation is done by the state agency(s) and then sent to Pacific States Marine Fisheries Commission (PSMFC) for entry into Pacific Fishery Information Network (PacFIN).

Although on the surface this may appear to be an adequate monitoring and accounting process, the EC sees numerous problems with this process. Our primary concern is that the opportunity for underreporting is extremely high, yet we have little information to support this fear, primarily because we have little access to data which is often times severely outdated. This creates a situation where at sea boarding or dockside inspection can do little besides checking the permit status, but has no real time information on the actual status of the tier(s) being fished.

There is no state regulatory requirement for the tier permit number to be listed on the state fish ticket. Since inception of the tier program, there has been a voluntary request made to the state agencies to list the federal permit number on the state ticket. To the extent the voluntary request is working is a matter of conjecture and, for us, a concern as well. Regardless, a state mandate requiring the Federal permit be listed on the state fish ticket would be a substantial improvement over the current reporting structure.

The EC believes the timeliness of data and access to the PACFIN data could be greatly improved through a Federal requirement that all tier deliveries be recorded on an Electronic (E) Fish Ticket. The E Fish Ticket program is now in its fifth year of implementation. Since inception of trawl rationalization, over 8,000 individual fishing quota (IFQ) trawl deliveries have been made with 96 percent of the tickets reconciled and in the data base within 48 hours. Contrast this with the paper system that can take weeks to months.

As envisioned, the tier permit(s) would be “loaded” with the appropriate pounds within an established corresponding vessel account. When deliveries are made, the operator would be required by rule to designate which of their tiers said pounds should be applied too. As with the corresponding IFQ data access that is currently enjoyed by all interested parties, the operator, tier owner, science centers, state and federal managers and enforcement would have access to tier delivery information, with no time lag or guessing whether the delivery is a tier delivery, under whose permit, or is in fact not a tier delivery but a DTL delivery.

The PSMFC E Fish Ticket already has the appropriate fields and drop down boxed to accommodate this fishery. The EC believes this proposal represents a vast improvement in catch accounting, and is in fact necessary to ensure compliance in this highly valued, highly regarded fishery.

Regarding the matter of EC participation in a possible advisory body composition, the EC supports the inclusion of one state enforcement representative and one federal enforcement representative.

Recommendations:

1. A state (preferred) or Federal requirement that the federal permit number be listed on the state fish ticket
2. A federal requirement that all tier deliveries be recorded on an E Fish Ticket.
3. Advisory Body Composition: include one state enforcement representative and one Federal enforcement representative.

PFMC  
09/13/13