

ENFORCEMENT CONSULTANTS REPORT ON  
PRELIMINARY REVIEW OF EXEMPTED FISHING PERMITS (EPF's) FOR 2011

The Enforcement Consultants (EC) reviewed all pending Exempted Fishing Permit (EFP) proposals before the Council for consideration. We have a number of general concerns.

Regarding the Trolled Longline Chilipepper Rockfish EFP, the EC would like further clarification for the gear proposed. While the EFP gear to be used is well described with a diagram, the test line gear with 20 hooks and vertical gear test set are not. We would like a better description of all gear to be used.

The EFP requires that the three participating vessels have 100% observation. We want to remind the participants that the Vessel Monitoring System will be required for this fishery consistent with current regulations.

Consistent with recognizing that EFP opportunities are a special privilege, the EC recommends that the Council consider language that would exclude those with certain kinds of recent violation history.

We are having difficulty reconciling two sentences in the 3<sup>rd</sup> paragraph of Page 2 of the proposal: "Full retention applies to rockfish species and retention of non-rockfish species will be governed by applicable open access limits and may be released once documented by an observer. Due to the fact that this is a research project there should be no trip limit". The EC requests clarification with respect to what will and will not be governed by a trip limit.

With regard to the West Coast Sanddab EFP, EC representatives discussed some initial concerns with Mr. Pettinger. He assured us that he would address those concerns with an amended EFP proposal.

The ODFW EFP, being continued from last year, is acceptable to the EC.

PFMC  
09/13/10