The Groundfish Advisory Subpanel (GAP) received brief overviews about exempted fishing permit (EFP) applications for potential public review and recommends that all of the EFPs go forward.

Furthermore, the GAP suggests the duration of any EFP be for one year from the date of permit issuance instead of issued for a calendar year. Applicants would then have the opportunity to make plans for fishing, get observers, and be able to fish year-round. For instance, one applicant received a permit with a duration from September to December – well past the prime season for fishing and obtaining qualified information.

As an alternative, the GAP suggests the Council consider beginning discussion on changes to EFP operating procedures so permits are in effect for two years and match the biannual harvest specification cycle. The two-meeting EFP process could be started in March and culminate with a final Council decision in June, at the same time the final specifications are made. There are several advantages to this:

- Annual staff workload would be reduced
- Observers would be available after their March training sessions
- Applicants could make plans for any fishing season
- Spex cycle and permits would be in sync

However, the GAP also recognizes there is at least one issue that must be addressed for this option to move forward. Set-asides would have to be adjusted through in-season management, something that cannot be done now due to restrictions in Amendment 21. For example, if an applicant receives a permit good for two years but cannot use the EFP due to unforeseen circumstances, the set-asides allowed for that permit would be stranded. Under Amendment 21, those set-asides cannot be transferred back to the fishery. The GAP also will be bringing this issue up under I.6, trailing amendments.

If the Council would like to pursue this option, there is time to do this and finish it in time for the 2013-14 specifications cycle.

The GAP also suggests that if an application and permit is issued for an EFP that is clearly scientific in nature – as opposed to an EFP for testing fishing innovation – the fish for that EFP should come out of the research set-aside instead of that particular sector’s allocation.

**Oregon Department of Fish and Wildlife Yelloweye Rockfish in Sport Charter Fishery EFP**

This EFP, in our opinion, needs no modifications. This is the only way to obtain any yelloweye information – information sorely needed for future analysis and stock assessments.
**Chilipepper Rockfish Trolled Longline EFP**

The GAP recommended this in November 2009 and still recommends it go forward as outlined in the application.

**West Coast Sanddab EFP**

Designed to test areas to minimize the Rockfish Conservation Area (RCA) footprint, this EFP poses no more risk for catching overfished species than does fishing outside the RCA. Since this will take place after the Trawl Individual Quota program is implemented, all trips will be observed and vessels will use their own quota pounds to cover target and bycatch.

However, the GAP suggests further consideration of caps on other species to prevent targeting of other species in the RCA and encourage targeting on sanddabs. Changing the vessel selection criteria also may allow for greater participation.

PFMC
09/14/10