

ENFORCEMENT CONSULTANTS COMMITTEE (EC) REPORT ON THE CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE REPORT ON REGULATORY OPTIONS FOR
FILLETING OF TUNA AT SEA IN CALIFORNIA MARINE RECREATIONAL FISHERIES

The Enforcement Consultants (EC) met and discussed Agenda Item I.3.b, Supplemental CDFW Report regarding regulatory options for filleting tuna at-sea in California marine recreational fisheries. We would like to emphasize that any regulatory changes made to bag and possession limits for tuna should include the ability to differentiate the various species and number of tuna that may be aboard a vessel. Our ability to effectively enforce changes to the bag and possession limits of tuna is dependent upon this requirement.

Enforcement and biological representatives from both NOAA and California Department of Fish and Wildlife (CDFW) met with industry and have agreed upon a fillet configuration/technique that we believe will meet our needs. This agreed upon method is described in detail in the Agenda Item I.3.b, Supplemental CDFW Report. We would like to emphasize the need to include all six pieces, as removed during the fillet process, together in an individual bag with the skin attached. In addition, to facilitate enforcement, we recommend the bag be marked with the species of tuna contained in the bag.

The Sportfishing Association of California (SAC) has suggested they are willing to create training and outreach materials to be provided to enforcement, industry and the public, in addition to putting on training for enforcement staff. The EC commends and encourages the SAC on this effort.

The EC has been approached with concerns raised regarding the Pacific Bluefin trip limit cap proposal referenced in HMSAS Agenda Item I.2.d Supplemental Report. The EC would like to offer a suggestion that any Bluefin trip delivery overages be handled in a manner similar to how overages were handled in the past in the groundfish trawl fleet prior to IFQ, where 1) All fish were required to be retained and delivered to a licensed fish receiver, 2) The proceeds from the overage were surrendered to the state, and 3) The entire offload poundage was deducted from the annual quota. Using this system, fish will not be needlessly wasted, and the incentive to catch more than the 20 ton catch limit will be greatly reduced.

The EC realizes that there are many issues to be worked out in the creation of any new regulations that may be proposed, and will need to further review any regulatory language when created.