

ENFORCEMENT CONSULTANTS REPORT ON STATUS AND FOLLOW-UP ON  
IMPLEMENTATION OF AMENDMENT 20 (TRAWL RATIONALIZATION) AND  
AMENDMENT 21 (INTERSECTOR ALLOCATION)

Regarding transfer of limited entry (LE) trawl permits under Amendment 21, the Enforcement Consultants (EC) would like to recommend to the Council that if trip limits are applicable in any sector under trawl rationalization, then the effective date for the transfer of LE trawl permits in that sector should coincide with the beginning of that sector's cumulative trip limit periods to avoid the potential for "double dipping."

For example: if both the at-sea sector and shoreside sectors have trip limits for yellowtail, and our recommendation is not implemented, a vessel could fish one sector early in the period, have their LE trawl permit transferred to another vessel, effective immediately, and then fish in the at-sea sector later in the same trip period, thus benefitting from two trip limits in the same period.

This same scenario could occur within a sector as well, i.e. vessel one fishes under permit A early in the period, transfers permit A to vessel 2 who in turn fishes on that permit in the latter part of the same trip period.

PFMC  
09/15/10