ENFORCEMENT CONSULTANTS REPORT ON FISHERY MANAGEMENT PLAN 20: TRAWL RATIONALIZATION

The Enforcement Consultants (EC) have understood that the role of the on-board observer engaged in the trawl rationalization program would include monitoring for compliance. Including compliance monitoring with the current west coast observer model will require careful planning. To date, no discussions between the science center and the EC on monitor responsibilities, training and interactions with law enforcement have occurred. A successful merger of these program elements is already occurring in other regions such as Alaska and should be used as a template for the west coast.

The EC has significant concerns over the reluctance from the Science Center in embracing a regulatory concept. It is clear that the success of the trawl rationalization program relies on monitoring, timely reporting and networking with state and federal law enforcement once the program is underway.

If we are going from 20 percent biological observations to 100 percent observer/compliance monitoring responsibility, a fundamental shift needs to occur in the current observer program, beginning with philosophy, recruitment, training and support.

Our experience with the current at-sea observer program has resulted in Science Center unwillingness in sharing information with law enforcement. There seems to be a philosophy that a close working relationship between observers and law enforcement could impede data collection. This thought process is in direct conflict with what would be required for an accountable Trawl Individual Quota (TIQ) program.

In contrast, the compliance monitoring program developed for the shore-based whiting Exempted Fishing Permit (EFP) is a program in which the EC has a high degree of confidence. In development of the program, Federal and state law enforcement agencies were fully engaged, beginning with recruitment, training and developing and providing support for those working within the program.

The EC believes that the Council has an opportunity to investigate other models in terms of managing this program, to include the current shore-based catch monitoring program or state run enforcement technicians implemented through the state/Federal cooperative enforcement agreement process.

EC expectations of the at-sea component of the Trawl Rationalization Program

- Require full and real-time disclosure of information from the monitor for both state and Federal enforcement partners.
- Training on documentation practices sufficient for law enforcement follow-up.
- Ensure that biological collection does not detract from the mandate to monitor compliance.
• Communication plan between vessel monitors and shore-side monitors.

• Operational support at all levels that embraces the compliance monitoring component of trawl rationalization.

PFMC
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