

STATEMENT OF THE GROUND FISH ADVISORY SUBPANEL  
ON SABLEFISH PERMIT STACKING

The Groundfish Advisory Subpanel (GAP) discussed options for sablefish permit stacking as presented in Exhibit C.8.a, Attachment 1. The focus of the discussion was a proposal presented by the fixed gear fleet. Due to conflicts with other meetings, only nine GAP members were present. Seven of those present supported the fixed gear fleet proposal; one abstained; and one supported most of the proposal, but disagreed with some elements. The proposal and areas of disagreement are as follows:

**Provision 1: Basic Stacking**

The Council should proceed with stacking, regardless of whether there is an extended season. Those that choose to stack should bear the burden of any decrease in limits or time which might result from lack of an exception to an individual transferable quota moratorium.

**Provision 2: Base Permit & Gear Usage**

Option 2c: A vessel may fish with any fixed gear endorsed on at least one of its stacked permits; waive trawl permit downsizing provisions for stacked fixed gear permits (applies only if stacked permits can be unstacked).

**Provision 3: Limits on Stacking and Ownership**

Stack no more than three permits per vessel; allow ownership of no more than three permits. Any percentage of permit ownership will be considered full ownership. Provide a grandfather clause with a control date of November 1, 2000, exempting current levels of ownership.

**Provision 4: Combination of Stacked Permits**

The majority supported option 4a, allowing permits to be unstacked. A minority supported option 4c, making stacking permanent but allowing trading of tier endorsements among the endorsed fleet.

**Provision 5: Fishery Duration**

For 2001, start the season as soon as possible after April 1<sup>st</sup> and extend it to October 31<sup>st</sup>. For subsequent years, set the season as April 1<sup>st</sup> to October 31<sup>st</sup>.

In regard to mid-season permit transfers, require the seller to provide fish ticket information to the buyer and require the buyer to keep the seller's fish ticket information on board during that season.

**Provision 6: At-sea Processing**

Adopt option 6a prohibiting at-sea processing except for vessels that can demonstrate through acceptable documentation the landing of at least 2000 pounds of frozen sablefish in 1998, 1999, or 2000. ✓

**Provision 7: Permit Ownership/Owner On Board**

The majority supported option 7a, which provides that only individual human beings (with a heart) can acquire permits; that the permit owner must be on board while fishing; that an

exception be made for - as of November 1, 2000 - businesses already owning permits and permitting current owners to be absent while fishing as long as they also own the vessel. These exceptions will expire with a change in permit or business ownership. Permit owners can be required to submit ownership information to management authorities.

*Not*  
A minority supported option 7b, allowing business entities to own a permit and imposing no requirements for the owner to be on board the vessel while fishing.

**Provision 8: Nonsablefish Cumulative Limits**

Adopt option 8a providing no stacking of nonsablefish cumulative limits. Vessels with stacked permits can land only one daily trip limit fishery limit.

**Provision 9: Vessels Without Sablefish Endorsements**

Adopt option 9b, allowing unendorsed vessels to fish during the primary fishery.

**Provision 10: U.S. Citizenship Requirement**

Adopt option 10a allowing only U.S. citizens to acquire fixed gear sablefish permits.

**Provision 11: Advance Notice of Landing**

Adopt option 11c requiring six hours advanced notice for all fixed gear sablefish tier permits and providing that additional information may be required.

**Provision 12: Stacking Deadline**

Declare an intent to stack by a date as late as possible which meets the needs of Council and/or National Marine Fisheries Service staff.

PFMC  
11/01/00