

GROUND FISH ADVISORY SUBPANEL STATEMENT ON GROUND FISH STRATEGIC PLAN IMPLEMENTATION

The Groundfish Advisory Subpanel (GAP) discussed the issues identified under the Exhibit F.2 Situation Summary and makes the following comments.

Marine Reserves

The GAP reviewed the material submitted by the Channel Islands National Marine Sanctuary (CINMS) staff, heard reports from GAP members who had fished in the CINMS area, and received a briefing from the CINMS staff.

The National Marine Sanctuaries Act specifically provides that regulation of fishing within marine sanctuaries is the responsibility of the Council and any applicable state (in this case, California). Thus, it is important the Council play an active role in examining proposals for marine reserves such as are contemplated by CINMS. The Council has already spent considerable time and energy developing its own strategy for marine reserves. Given these facts, the GAP believes the Sanctuary must coordinate its plans with the Council, and not simply inform the Council what it wants to do.

While marine reserves may play a role in conserving fish stocks, they obviously can have significant economic impacts on commercial and recreational fishermen, processors, support industries and businesses, and local communities. The GAP believes a detailed economic impact statement is needed before any marine reserves are established. Further, given the potential economic losses associated with establishment of marine reserves, several GAP members raised the question of who pays to mitigate those losses? Fishermen and processors are already paying the cost of rebuilding through reduced groundfish harvest. Will they also be required to pay for the theoretical benefits that might (or might not) accrue from establishment of marine reserves? The GAP believes any working group established to look at marine reserves should be fully representative of all interests.

If a marine reserve is to be established, how will it be monitored to ensure it is doing what it is supposed to do? Who will supply the funding? What sort of monitoring will occur? How will the reserve be enforced, and how will enforcement costs be covered?

The GAP notes the Implementation Development Team on Marine Reserves established under the Council's Ad Hoc Groundfish Strategic Plan Implementation Oversight Committee made several recommendations which could be useful here. The GAP believes a process should be followed wherein the scientific criteria for marine reserves be developed by an independent scientific committee, but the actual delineation of the reserves within those criteria be done by users who are familiar with the area and the resources it contains.

Open Access Permits

The GAP has commented in the past that establishment of an open access permit system will entail considerable costs to the Council in terms of time and workload. The GAP notes that the individual states are addressing near shore open access fisheries under state management policies, and believes the state processes should be completed before the Council takes additional action on a permitting system. However, because the groundfish fishery is subject to a fishery management plan, the GAP believes the Council should be involved in the state processes and have final authority over state plans that affect the groundfish fishery.

Buyback

The GAP received a presentation from Mr. Pete Leipzig of Fishermen's Marketing Association (FMA) regarding the FMA questionnaire on buyback. The GAP urges the Council to continue forward with a buyback plan to facilitate capacity reduction. The GAP endorses the concept of all users paying the cost of buyback proportionate to the benefits they will receive.

Enforcement

The GAP recognizes the concerns expressed by the Enforcement Consultants in regard to considering enforcement costs in management measures and urges the Council to recognize these costs when deciding on management actions.