

ENFORCEMENT CONSULTANTS REPORT ON
STATUS OF FISHERIES AND CONSIDERATION OF INSEASON ADJUSTMENTS

Enforcement Consultants (EC) reviewed the inseason management measures and I will be referring to Exhibit F.5.b, Supplemental EC Report.

We have comments in two areas.

The first area deals with the proposed trip limit change for salmon troll for yellowtail.

The EC believe the GMT's recommendation of 2 yellowtail for every salmon is clear and enforceable.

We recommend it be made clear in the salmon regulations that salmon vessels landing groundfish must keep their fishtickets on their vessel for their cumulative period. This could be included in the footnotes where they list the halibut incidental catch restrictions.

States must also reinforce with dealers that they record numbers of fish as well as poundage of fish for salmon trollers. We are not aware of any state fishticket that currently lists numbers of groundfish on their fishtickets.

The other issue we discussed was the language on fish excluders in the state-managed pink shrimp fishery. We are encouraged that all three states appear to be adopting the same excluder devices. However, there are several additional rules that need to be implemented to make this rule more enforceable as we proceed (based on language provided by California). Some examples would be:

1. No shrimp trawl net may be possessed on board a vessel that do not include excluders.
2. No shrimp trawl nets may be removed from the vessel prior to the off loading of pink shrimp.
3. Discussion of the language that includes "hand pressure". Enforcement does not know what this means or what industry would interpret this to mean.
4. Current language is not clear that the escape opening for excluders is actually placed forward of the device designed to direct the fish.
5. Language may need to be included in federal rules or by the states that recognizes regulations may be implemented at different times by different states.

The language would prohibit the taking of groundfish by a vessel in federal waters off the states that require excluders by nonresident vessels that do not comply with that states rules.

We are encouraged the states are working in concert to adopt similar regulations and encourage a tri-state agreement to adopt the same regulation package when implemented by individual states.