

GROUND FISH MANAGEMENT TEAM STATEMENT ON SABLEFISH 3-TIER PROGRAM,
QUALIFICATION WITH SETNET LANDINGS

The Groundfish Management Team (GMT) supports allowing sablefish landed under a setnet Exempted Fishing Permit (EFP) during 1984-1985 to count towards the 1984-1994 cumulative poundage history used for making tier assignments in the limited-entry fixed-gear primary season. We believe that a narrow interpretation of the applicability of these landings to tier assignment is fair and reasonable, and we would not support expanding the use of such landings to re-evaluate qualification for a sablefish endorsement or a limited-entry permit; nor should consideration of setnet landings under this EFP bring into consideration other setnet landings not made under the EFP.

The original qualifying window for limited entry continued for 2½ years after the conclusion of the EFP setnet opportunity, allowing ample time for the required six landings to be made. The sablefish endorsement qualifier required that sablefish landings with limited-entry fixed gear exceed 16,000 lb in only one year from 1984-94. These circumstances are different from the tier qualifier, which was based on cumulative landings over the latter 11 year period. Removing two years, which contained extensive sablefish opportunity, from the cumulative landings history, because of participation in a Council-sanctioned EFP, to examine alternative gear usage could send the wrong message to the industry. We are concerned that failure to consider landings made under this EFP may discourage future participation in fishery experiments intended to gather information that could enhance management options in the fishery.