

ENFORCEMENT CONSULTANTS COMMENTS ON
LIMITED ENTRY FIXED GEAR SABLEFISH PERMIT STACKING AND SEASON FOR
2001 AND BEYOND

The Enforcement Consultants (EC) discussed the issues outlined in Exhibit C.7.b, Supplemental NMFS Report.

Issue 1 - Owner on Board

The three options are policy decisions and language could be adopted to enforce all three.

The EC spoke with the Groundfish Advisory Subpanel (GAP), and they have an option that states:

...a modified option (b) should be used, which would require the owner to be on board during the entire primary season until the primary season limit has been taken, but only when the vessel is fishing for groundfish. Since some vessels fish for nongroundfish species such as crab, retaining the owner on board requirement for these fisheries seems excessive.

The EC supports that option.

The EC would ask that the permits, when issued, simply state whether owner on board is required.

Issue 2 - Gear Use for Permits with Different Size Endorsements

The EC sees this again as a policy issue. The EC does not have the capability to monitor the fishing activities of the fleet for six months at sea as well as dockside (on a trip-by-trip basis). Our recommendation is that as the permits are stacked, the vessel would be endorsed for both gears and would be limited only by the limited entry limits when using any of the listed gears.

If the boat then went to another fishery using open access gear (hook-and-line), the boat would be required to abide by the most restrictive limit.

Issue 3 - Advance Notice of Landings

The EC had a short discussion with the GAP and NMFS on this issue. We need to look at the logistics of maintaining a call-in system for six months.

In the past, call-in systems have been used for short durations or for small numbers of vessels, rather than for a longer season with many vessels. We would like to explore what is being done in Alaska.

Owner on Board Exemption

The EC asks that NMFS look at requiring documentation from a doctor in the event of an illness, or possibly limiting the ability to use an exemption to once in a three-year period.