

GROUND FISH ADVISORY SUBPANEL STATEMENT ON
STANDARDS AND CRITERIA FOR APPROVING EXEMPTED FISHING PERMITS

The Groundfish Advisory Subpanel (GAP) met jointly with the Groundfish Management Team (GMT) to discuss the criteria they developed for evaluating exempted fishing permit (EFP) proposals and the process to be used for allocating fish to EFP programs.

In general, the GAP found the GMT's recommendations acceptable, with one exception. On page 2 of the GMT's Draft Council Operating Procedures (Supplemental Revised Attachment 2, Exhibit E.7) under "Other considerations," the GMT recommends that EFP applications be evaluated on the basis of enforcement concerns including "documented fish receiving tickets that indicate misreported or under-reported groundfish landings." In other words, an EFP applicant could be denied, because there was an unresolved dispute over two fishtickets - an event which is fairly common and which is usually resolved without any violation or serious penalty. The GAP believes this particular criterion is excessive and unnecessary. We understand that the Enforcement Consultants are developing alternative language, which ties potential denial of an EFP applicant to significant violations for which a severe civil or criminal penalty has been imposed after proper adjudication. This is a more reasonable approach that the GAP could endorse.

PFMC
04/10/03