

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

The Groundfish Advisory Subpanel (GAP) reviewed the proposed timetable and changes in Council operating procedures developed by the Groundfish Management Team (GMT) and provided in Exhibit B.6.b GMT Reports 1 through 3.

While the GAP generally agrees with the GMT recommendations, it suggests one modification to the timetable. As proposed, unused "set asides" are scheduled for release in April of each year. However, because the Council has adopted a system of using two, one-year optimum yields (OYs) within the two-year management process, it is unlikely we will know in April whether an exempted fishing permit (EFP) "set aside" will be fully used, especially for new EFPs and those that involve a summer-only fishery. The GAP recommends additional check points be established that will allow unused "set asides" to be released in time for any inseason adjustments that could occur for the remainder of the year.

An alternative could involve a roll-over of unused OY and EFP "set asides" to the second year of the two-year cycle, thus bringing us closer to true two-year management and allowing greater stability in the fisheries.

The GAP also suggests there is a policy issue implicit in the EFP process which must be considered by the Councils: at low OY levels, does the use of fish for EFPs "trump" the use of fish for directed fisheries and/or incidental catch in directed fisheries? The Council will need to keep this issue in mind each and every time it approves an EFP and develop some standards on how to weigh the costs and benefits of using scarce fish for EFPs versus directed fisheries.

PFMC
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