

ENFORCEMENT CONSULTANTS REPORT ON
EXPANSION OF VESSEL MONITORING SYSTEM

The Enforcement Consultants (EC) supports Alternative 5 in Table 2.0.1 on page 7 of Agendum C.10.b, Attachment 1, September 2004 with the following changes:

Salmon Troll - due to the existence of regulations holding vessels to the most restrictive limits and the existence of differential trip limits for this gear type, depending on whether the fishing activity occurs within the Rockfish Conservation Area (RCA) or outside the RCA, the EC recommends the inclusion of salmon troll in the vessel monitoring system (VMS) expansion.

Recommended exceptions to VMS requirements are pink shrimp, highly migratory species, and crab fisheries. When considering who should be exempted, the determining factor was that current management lines, or RCA's, can and do change also, potentially changing the ability and incentives to fish illegally in the RCA. Our recommendations for inclusion and exclusion essentially mirror the Groundfish Advisory Subpanel (GAP) recommendation.

The EC recommends that VMS activation and VMS on/off regulations for the open access fishery, to include trollers, would be the same as the limited entry VMS regulations.

The EC evaluated an initial GAP suggestion that open access vessels engaged in fisheries other than groundfish, or those that are in port, be able to turn off the VMS unit. Our position is that the ability of some vessels to be unmonitored for periods of time defeats the purpose of VMS and would render the program useless. Under current regulations for the limited entry fleet, VMS units can be turned off when leaving the Exclusive Economic Zone or when entering dry dock for more than seven days. Any cost savings are minimal.

The EC met with the GAP on Wednesday and proposed a permitting system for all vessels that use longline, troll, pot, trawl, and line gear while engaged in activity pursuant to the harvest guidelines, quotas, and other management measures governing the open access fishery in federal waters. This open access groundfish permit (OAGP) would be non-transferable and renewable annually. The EC would like to see permits in place for the open access fishery for the purpose of utilizing a sanctioning tool, similar to the same kind of tool available in the limited entry program. However, we recognize that this desire would require further analysis and offer it for future consideration. If the concept of assigning an OAGP to a vessel were adopted, we envision that the issuance of a permit would trigger a requirement that a vessel be equipped with an activated VMS unit.

PFMC
09/16/04