

## ENFORCEMENT CONSULTANTS REPORT ON SHORE-BASED PACIFIC WHITING MONITORING PROGRAM

The Enforcement Consultants (EC) have reviewed Agenda Item E.3.b, Attachment 3, dated June 2007, A Maximum Retention and Monitoring Program for the Pacific Whiting Shoreside Fishery and have the following comments.

The EC supports the NMFS preferred Alternative 4b found on page 2-4, table 2.1, which includes the definition of the Data Quality Monitors found on page 2-13. The third party employed Data Quality Monitors provide the best opportunity for providing the desired plant monitoring coverage and for maintaining the consistency, quality, independence, and integrity of the data. The other options lack these attributes and therefore are not adequate for meeting the monitoring and compliance objectives.

Regarding the disposition of overage fish, the EC supports the status quo option Alternative 4A detailed on page 2-14.

The EC looks forward to Council action on Amendment 10 and its anticipated promulgation into rule and regulation.

Moving to another aspect of the whiting fishery, the EC would like to encourage the Council to consider developing regulations that would move the at sea whiting fishery to a full retention fishery using electronic monitoring. Given the Council's, industry's and public's concern for by catch, we believe full retention and electronic monitoring are a necessary step in managing this fishery.

We would also recommend the Council require mandatory log books of this fishery. Because the whiting are processed prior to being landed, the landed product is exempt from state fish ticket reporting requirements. Reporting of at sea catch and processing activity is currently 3 fold: non regulated production reports, observer data, and voluntary log books. The voluntary nature of the log book makes the data contained in the log books inadequate for investigating discrepancies between the voluntary log book and observer data. This situation has compromised recent investigations into at sea whiting fishing activity and needs to be rectified.

PFMC  
06/12/07