

ENFORCEMENT CONSULTANTS REPORT ON AMENDMENT 20: TRAWL
RATIONALIZATION ALTERNATIVES (TRAWL INDIVIDUAL QUOTAS AND
COOPERATIVES)

The Enforcement Consultants (EC) have reviewed Trawl Rationalization Alternatives Attachment D.7.b, Attachment 2 and Agenda Item D.7.a, Attachment 1 and have the following comments.

The EC would like to express its appreciation to the Trawl Individual Quota Committee (TIQC), Groundfish Allocation Committee (GAC), Groundfish Advisory Subpanel (GAP), and Groundfish Management Team (GMT) for their continued support of the suite of monitoring and compliance alternatives contained in the documents, and believe this suite of proposed alternatives adequately covers the range of monitoring issues pertinent to successful implementation of a trawl rationalization program.

Vessel Minimum Holding Requirement (A-2.2.1)

We concur with the GAC and TIQC recommendation that a minimum holding requirement be eliminated. We believe the requirements listed in Table 3, A-2.2.1, page 13 of Attachment 2 is adequate and appropriate.

Vessel Quota Pound Overage Resolution (A-2.2.1)

We concur with the TIQC and recommend retaining Options 1 and 2 for analysis.

Trading Individual Fishing Quotas (IFQs) with Limited Entry Fixed Gear Vessels

The EC does not believe this option has overwhelming monitoring and compliance issues that would preclude this option for analysis, but does believe that this option adds a layer of complexity that could negatively impact initial implementation, and recommends this option be tables and reconsidered as a trailing amendment after initial implementation of the TIQ program.

Vessel Size Endorsements

The EC believes vessel size endorsements are an obsolete, unnecessary management measure within the TIQ program and recommends this licensing endorsement requirement be dropped with implementation of the TIQ program.

Shoreside Sector Co-op Program (B2)

The EC has grave concerns regarding the Shoreside Sector Co-op as currently proposed. We find the processor linkage option confusing and therefore struggle in trying to anticipate how regulations would be prorogated to support this management objective, and once prorogated, how those regulations would be effectively enforced. The EC does not believe this proposal should be moved forward for analysis until the processor linkage option is given more clarity and specificity.