

ENFORCEMENT REPORT ON INCIDENTAL 2009 CATCH REGULATIONS IN THE  
SALMON TROLL AND FIXED GEAR SABLEFISH FISHERIES

Upon review of the incidental catch regulation options for the 2009 salmon troll and fixed gear sablefish fisheries by the Enforcement Consultants (EC), two concerns surfaced. As written, the situation summary Agenda Item I.1.b, halibut to salmon or halibut to sablefish ratio options could only be enforced upon offloading of the catch shoreside. The same is true with regard to total landing limits (e.g. 35 halibut landed per salmon troll trip). This approach could result in the targeting of halibut and eliminates our ability to enforce limits during an at-sea compliance boarding. If the intent is to ensure halibut catches are truly incidental to directed fishing for sablefish and salmon, it is our recommendation the words “land” or “landed” be replaced with “possession” or “possession onboard whenever you consider ratio fisheries.”

If the Council agrees that incidental halibut catch regulations should be enforced from a “possession” versus “landing” perspective, simplifying what can be possessed is valuable if at-sea enforcement is to be effective. Of the options presented for the sablefish fishery North of Point Chehalis, Option 1 is much more straightforward than Option 2. While the EC is not weighing in on the amounts of halibut that should be allowed, we do wish to point out that total pounds or number of halibut allowed is much easier to enforce at-sea than “poundage” ratios, particularly where large amounts of target fish may be concerned. For example, instead of 17 pounds of halibut per 1,000 pounds of sablefish, translate that to a set number of halibut to sablefish (preferred) or total pounds of halibut allowed in possession.

PFMC  
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