

ENFORCEMENT CONSULTANTS REPORT ON FISHERY MANAGEMENT PLAN (FMP)
AMENDMENTS 20 AND 21 – TRAWL RATIONALIZATION AND INTERSECTOR
ALLOCATION – REGULATORY OVERVIEW AND FINAL ACTION ON
MISCELLANEOUS REMAINING ISSUES AND FMP LANGUAGE

The Enforcement Consultants (EC) would like to take this opportunity to affirm its statement on Trawl Rationalization made at the 2008 November Council meeting on catch monitoring.

Quota pounds held in Trawl Individual Quota (TIQ) vessel accounts will be deducted from those accounts through three mechanisms; landing reductions, transfer reductions, and reductions correlating to at-sea observations of discards. Accurate and timely accounting of these observations and subsequent reductions is an essential element of trawl rationalization for industry participants, fishery managers, and enforcement. To that end the EC makes the following recommendations.

At-Sea Catch Monitoring for the Shoreside Sector

Non-whiting. The EC recommends 100 percent observer coverage for this sector of the fishery. Discards of non marketable product are inevitable in this fishery, but still need full accounting. It is the EC's position that human observers are the only viable way of achieving an acceptable level of accountability in an accurate and timely manner.

Shoreside Whiting

There has been some discussion over the necessity of human observers versus camera monitoring in this sector. The EC believes human observation on the vessels is critical. Under Amendment 10, shoreside whiting is a maximized retention fishery monitored by cameras. A maximized retention fishery allows for up to two baskets of discard per tow, which is different than full retention. Discards that exceed this amount must be self reported and require the operator to terminate their trip. The amount of discards are "estimated," and then incorporated into the fishery management process. TIQ fisheries cannot rely on "estimates," so the precision that human observation brings is important. There are a number of other negatives associated with reliance upon cameras versus human observation. They include: difficulties in the ability to identify species depending on conditions, resolution and camera placement, stand alone camera monitoring has the potential to cause debate over what was caught or discarded, and time lags in data evaluation could affect efficiencies in enforcement and fishing.

In order to achieve the Council's requirements for accuracy and accountability, the EC recommends 100 percent observer coverage be deployed in the TIQ shoreside whiting fishery to achieve catch monitoring goals, and the use of cameras as a backup, or secondary monitoring tool.

At-Sea Mothership Whiting Fishery

The EC recommends 100 percent human observers be deployed on at-sea catcher vessels delivering whiting to motherships, to best achieve the catch monitoring goals of the Trawl Rationalization Mothership Coop Fishery. The EC acknowledges that using a person to monitor the transfer of cod ends from the catcher vessel to a mothership requires the same level of accuracy, timeliness, and accountability as the shoreside sectors of the Trawl Rationalization Program. Much can happen with the catch between the time the cod end is filled and later transferred.

PFMC
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