

ENFORCEMENT CONSULTANTS REPORT ON SURVEY METHODOLOGY REVIEW
AND EXEMPTED FISHING PERMIT (EFP)

The Enforcement Consultants (EC) would like to recommend a few changes to the 2009 West Coast Sardine EFP.

This EFP, if approved, will take place when the sardine fishery season is closed. Because of this, the EC strongly recommends that participants be required to notify the Regional NOAA Office For Law Enforcement and the appropriate State Fish and Wildlife Enforcement entity a minimum of 24 hours prior to carrying out any fishing under the EFP. The following information should be included in the notification:

- Date of fishing trip
- Time fishing to be conducted
- Boat name
- Operator\Permittee name
- Location to be fished
- Location catch will be landed/stored

The EC does not have a full understanding with regard to what the appropriate level of concern is with this particular fishing activity in terms of bycatch encounters. If concerns are low, at a minimum the EFP should require full retention, sorting at time of landing, and accurate reporting on fish receiving tickets. If the concerns are higher, human and electronic monitoring should be considered in order to guarantee accurate catch accounting.

The EFP application requests that the fish be sold to help defray the costs, but does not clearly discuss how bycatch will be handled. The Northern Coastal Pelagic Species fleet has encountered salmon in the past and a process has been developed to properly dispose of those fish without illegally placing them in the market place. For example, it would be inappropriate (and illegal) to sell Coho Salmon in California as they have no allowed commercial seasons. Instead, a donation strategy should be developed after the fish are sampled and accounted for.

PFMC
06/16/09