

TRAWL RATIONALIZATION TRAILING ACTIONS:  
DESCRIPTIONS AND NEXT STEPS

**For Final Council Action at this Meeting (Council Action #1)**

At the March 2012 Council, meeting there was a discussion of the need to reprioritize the Program Improvements and Enhancement Rule 2 (PIE 2) trailing action items to ensure that the time table could be met for reconsideration of shoreside and mothership whiting fishery catch shares. To that end, it was agreed that at this meeting Council decisions on trailing actions would only proceed on those items slated for PIE 2 which require limited analysis and regulatory language and the chafing gear issue. On this basis, the following have been brought to the Council for finalization at this meeting.

PIE Rule 2, Council list (covered in this attachment)

1. Allow fixed gear and trawl permits to be registered to the same vessel at the same time -
2. Change the opt-out requirement for QP deficits
3. Eliminate the double filing of co-op reports
4. Whiting season opening date and southern allocation (also see Agenda Item I.4.a, Attachment 2)
5. Chafing gear (also see Agenda Item I.4.a, Attachment 3)

PIE Rule 2, NMFS list (covered in Agenda Item I.4.c, NMFS Trailing Actions)

1. First receive site license changes
2. Catch monitor certification requirements
3. Start renewal process 9/15 for LE permit, vessel account, and QS permits
4. Remove 12/15-31 ban on QP transfer
5. Observer provider certification
6. Clarify processor obligation
7. Observer program regulatory changes
8. Change “permit holder” to “vessel owner”
9. Process for changes vessel ownership

**For Council Planning Actions (Council Action #2)**

**Widow Rockfish QS Reallocation.** At its March 2012 meeting, the Council decided to move forward with “developing alternatives for reallocation of widow rockfish quota shares at the permit level” leaving identification of the appropriate process and time frame for later action. At the end of the meeting, the Council scheduled the selection of a preliminary preferred alternative for the November 2012 Council meeting. A process and time schedule for development of the widow rockfish QS reallocation alternatives has yet to be determined. A calendar for trawl trailing actions is provided on page 2.

**Status on Actions Completed and Moving Forward for Implementation January 1, 2013** (for additional detail see March 2012, Agenda Item F.8.a, Attachment 1)

Cost Recovery - Trailing actions will be proceeding on cost recovery with regulations to be drafted for deeming by the executive director this spring and proposed regulations published such that the comment period will be open during the June Council meeting.

**Status on Delayed Actions** (for additional detail see March 2012, Agenda Item F.8.a, Attachment 1)

**Risk Pools - Safe Harbor from Control Rules** – The Council has finalized action on safe harbors for risk pools. Council transmittal and NMFS decision processes are delayed to prioritize quota reallocation for the whiting fishery.

**Lenders - Safe Harbor from Control Rules** – The Council has selected a preliminary preferred alternative (PPA) on safe harbors for lenders. Selection of a final preferred alternative (FPA) has been delayed to prioritize quota reallocation for the whiting fishery.

**Other Lender Issues** – The Council has not selected a PPA for other lender issues. The topics under this category have been narrowed to the question of whether the NMFS QS tracking system should include a capability that would allow the QS owner and lender to attach lender information to the QS account. In March, the GAP recommended no action on this issue. Further consideration has been delayed to prioritize quota reallocation for the whiting fishery.

**Gear Issues** – Gear issues include multiple gears on a trip, gear modifications to increase efficiency, and restrictions on areas in which gears may be used. Action on all of gear issues (except chafing gear) was delayed pending the results from a one day gear workshop to be convened by the Enforcement Consultants immediately prior to the June Council meeting.

**Calendar on Trawl Rationalization Actions**

Table. Council schedule for trawl rationalization related actions.

	Council Meetings			
	April	June	Sept	Nov
Current Trailing Actions				
Immediate Priority	Final Action (Agenda Item I.4)			
Gear		Gear Workshop Results	PPA	FPA
Lender Issues		FPA?	FPA?	
Other Remaining PIE 2 Issues (NMFS List)			FPA	
Widow QS Reallocation Amendment	Decide on Process (Agenda Item I.4)	??	??	PPA*
Electronic Monitoring	Discussion (Agenda Item I.4)			
Whiting Fishery Catch Share Reallocation	Identify Alternatives (Agenda Item I.5)	PPA	FPA	
Carry-over – Intermediate Term Response	PPA (Agenda Items I.3 and I.8)	FPA		
Carry-over –Long Term Solution				
PIE 3 (Implementation in 2014)			Scoping	Alternatives for Analysis*
Adaptive Management Program QP Distribution Methodology (Implement by 2015)				

\* Final Action required by April 2013 for implementation by January 1, 2014.

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### PIE Rule 2 Council List

#### 1. Allow fixed gear permit and trawl permits to be registered to the same vessel at the same time (Preliminary NEPA Determination: EA)

Originally, the license limitation program allowed a trawl and fixed gear (longline or fishpot) permit to be registered to the same vessel at the same time (additionally, there are a few permits endorsed for both trawl and one of the fixed gears). At a later time, because of enforcement and/or monitoring needs, regulations were modified to prohibit stacking of trawl permits with permits endorsed for other gears. Since then vessel monitoring system (VMS) and declaration systems may have reduced or eliminated the need for this restriction.

The trawl rationalization program was intended to allow vessels to move between the use of trawl and other gears while continuing to operate under the IFQ program (gear switching). Additionally, it allows vessels to participate in the IFQ fishery without ever using trawl gear. However, the flexibility of any vessel that wants to participate in both the IFQ program and the limited entry fixed gear fishery is limited by the number of times a permit may be transferred to a vessel in any year (one time per year).<sup>1</sup>

**Status quo:** A trawl endorsed permit cannot be on a vessel at the same time together with a limited entry longline or fishpot endorsed permit. A permit may only be transferred to a vessel one time per year.<sup>1</sup>

**Alternative 1:** Allow a trawl permit and up to three fixed gear permits (longline and/or fishpot) to be registered to the same vessel at the same time. No change to the number of transfers allowed per year.

**Alternative 2 (PPA):** Same as Alternative 1 but additionally specify that

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<sup>1</sup> The transfer of a permit from a vessel to a vessel “unidentified” status does not count against the transfer limit but if the permit is then transferred to a vessel (whether back to the same vessel from which it was transferred or a different vessel) that transfer counts against the limit. Thus a permit can be moved from and back to the same vessel one time per year.

- the established declaration process would be used to specify, for enforcement and monitoring purposes, which permit is being used or if fishing is being conducted in the open access gear, and
- the opportunity to stack a trawl gear permit with fixed gear permit would be specified in regulations such that the limited entry fixed gear exception for freezing sablefish would not allow the freezing of sablefish caught under the trawl rationalization program.

Another option which could address this issue would be to increase the number of transfers allowed per year. This would increase a vessel's flexibility to move between the limited entry trawl and fixed gear fishery and it would also allow more flexibility for vessels to move between the limited entry and open access fisheries, reducing the wall between these sectors. Such a provision would also increase administrative costs.

### **Summary of Impacts**

The increased flexibility for vessels in the fixed gear fishery to take part in the trawl fishery, and vice versa, could increase the amount of the trawl allocation taken by vessels using fixed gear.

**Degree of Effect:** Trawl vessels are already able to use fixed gear to take their trawl allocation, and fixed gear vessels are already allowed to switch into the trawl fishery and use fixed gear to take the trawl fishery through the acquisition of a trawl permit. The proposed action would increase the number of times a year a vessel could switch between participating in the limited entry fixed gear fishery and the trawl IFQ fishery. Under status quo, trawl vessels are able to increase their use of fixed gear to optimize profits, and would be expected to continue to do so to the degree that they generate higher profits.

The keys in determining the degree of effect of an increase in flexibility to move between fisheries is the degree to which (1) harvesting the trawl allocation with fixed gear yields higher profits than harvesting the allocation with trawl gear, (2) vessels that use only fixed gear are able to garner higher profits by expanding their fishing into the IFQ fishery than combination trawl-fixed gear vessels, and (3) the one time per year limit on transferring permits constrains the degree to which a fixed gear vessel would otherwise participate in the trawl IFQ fishery. The degree of effect will depend not only profits with respect to a particular species but the profits associated with all other species which are caught together with that species. For example, a complete switch of the harvest of sablefish from trawl gear to fixed gear would only be expected if the harvest of sablefish by fixed gear generated more profits than generated by all the species that trawlers catch together with sablefish. Quantitative information is not available to assess the degree to which the proposed increase in flexibility would result in a change in gear usage.

**Biological Impacts:** The ACLs and sector allocations would not be modified. Therefore, the biological impacts are limited to those related to difference between harvesting a portion of the trawl allocation with fixed gear as compared to trawl gear. Those differences likely relate primarily to habitat impacts and differences in gear selectivity. Amendment 20 specifies that vessels with trawl permits using a nontrawl gear are required to comply with the conservation areas applicable to those nontrawl gears (Section A-1.3). In general, the LE fixed gear RCA boundaries are shallower than the trawl RCA boundaries. Therefore, a switch from trawl gear to fixed gear would force activities into shallower waters shoreward of the RCA and allow vessels to fish in shallower areas seaward of the RCA. To the degree that an increased portion of the trawl allocation is taken by fixed gear vessels,

the habitats impacted and species harvested may be different than under status quo. In terms of gear selectivity, in addition to size selectivity (e.g. fixed gear may be selective for larger sablefish), fixed gear may also have different selectivity for bycatch species (e.g. fixed gear vessels tend to take more yelloweye as bycatch than trawl vessels). However, while the species selectivities may be different, all harvest of IFQ species will still have to be covered by QP, and harvest of non-IFQ groundfish species will be controlled through other applicable management regulations such that harvests will be maintained within the ACLs. Additionally, during the time fixed gear vessels are participating in the IFQ program they would be required to carry observers, increasing the information available about fixed gear bycatch of all species, including marine mammal and bird interactions.

Alternative 1 would allow a vessel which was grandfathered into the limited entry fixed gear fishery as a freezer longliner to also freeze sablefish that it catches under the trawl IFQ program. There is one vessel in this class. At present, that vessel cannot enter the trawl IFQ fishery as a freezer longliner because to do so would require it to remove its fixed gear permit, on which event the exception which allows it to freeze at sea would expire. The potential for increased freezing of sablefish at sea under Alternative 1 could decrease the availability of biological information, since sampling of fish processed at-sea would not be possible, except to the extent that the onboard observer might have an opportunity to take up that responsibility. Under the current program, onboard observer duties focus on the documentation of discards while shoreside monitors and samplers are responsible for collecting data on landed fish. Alternative 2 would prohibit the fixed gear freezer vessel from expanding its freezing operations into the trawl fishery ensuring that biological data could continue to be collected without having to make other adjustments to the program. The freezer longliner would be allowed to participate in the trawl IFQ program so long as it landed its trawl IFQ sablefish unprocessed.

**Socio-Economic Impacts:** The economic effect will be a possible increase in the net revenues generated by the fishery. Such an increase would be expected to have an upward increase on quota prices. To the degree that a shift occurs, there may be some social effects as the number of trawl vessels (or size of trawl operations) decrease and fixed gear operations increase. These effects would be expected to the degree that there are social differences between members of the trawl and fixed gear communities. Even if the differences are minimal, all shifts in the distribution of harvest generally involve some disruption as some individuals move out of production while others move in. Such shifts are part of the costs associated with a market based management system.

Alternative 2 would prevent the longline freezer vessel operating in the limited entry fixed gear fishery from freezing fish caught in the trawl IFQ fishery. This vessel was granted a very limited grandfather exception in the fixed gear fishery. The exception expires with a change in ownership of the permit or the vessel, or the separation of the permit from the vessel. The exception was so limited because it was an advantage being given to this vessel over any other vessel in the fishery, due to the vessels investment in at-sea processing equipment prior to the the prohibition of at-sea processing of fixed gear caught sablefish. Equity questions arise as to whether or not the vessel should be allowed to expand freezer its operations into the trawl IFQ fishery (freezing sablefish taken with fixed gear under the trawl IFQ program). Alternative 1 would allow this expansion. Any vessel allowed to process atsea, while others vessel do not have such opportunities, is likely to have a profit advantage over other vessel and therefore be more likely to accrue additional QS and QP, up to the accumulation limits.

**Agency and Data System Impacts:** The alternatives to status quo may reduce administrative costs by reducing the need for vessels to transfer their permits on and off a vessel in order to move between limited entry fisheries.

Alternative 2’s reliance on the gear declaration system could require an enhancement of the existing data system. Vessels which are dual-endorsed, have limited entry permits for both trawl gear and one of the fixed gears, present some challenges to the current data system. There are a total of 5 dual-endorsed permits. For such permits, managers and enforcement need to be able to determine whether such vessels are fishing in the IFQ fishery or the fixed gear fishery. The current regulations specify that this determination will be made based on the vessel gear declarations. However, gear declarations are sometimes in error. In this regard, at the November 2011 Council meeting the EC stated:

If this alternative [Alternative 2] is adopted, the EC strongly encourages industry leaders to impress upon their membership the importance of maintaining the proper declaration that accurately reflects their fishing activity. Accuracy with the declaration process is both legally required and vital to the analysis of effort by fishery managers.

A system has not been developed to handle corrections to the gear declarations and the provision of those modifications to managers responsible for tracking harvest. Allowing the stacking of fixed gear and trawl permits will increase the need for resolving this issue. There may be means other than the gear declarations for determining whether or not a trip is an IFQ trip. Alternative 2 would dictate that rather than using an alternative means for classifying a trip (e.g. the filing of an electronic landings record under the IFQ program) that the gear declarations program be used. This alternative may require an enhancement of that system such that corrected declarations are incorporated into the declaration datasets and that information from declaration data system is transmitted to the catch monitoring system (e.g. PacFIN).

	<b>Summary: Status and Next Steps</b>
✓	Originally prioritized for implementation in 2013. Now prioritized ASAP given workload constraints.
☀	Select a PPA.

## **2. Change the opt-out requirement for QP deficits (Preliminary NEPA Determination: No Further NEPA Required)**

The question under this issue is whether to change the opt-out requirement for QP deficits lasting more than 30 days, in order to allow vessels to rejoin the fishery after deficits are cleared.

Under status quo, any vessel with a documented deficit is prohibited from fishing groundfish and is required to cure the deficit within 30 days. If a vessel carries a deficit for more than 30 days and the amount of the deficit is within the carry-over allowance, then the vessel can stay within compliance of the program by opting out of the fishery for the remainder of the year. Vessels which do not opt out, but instead incur a violation, are allowed to rejoin the fishery as soon as the deficit is cured. Deficits greater than the carryover allowance must be brought to within the carryover allowance before the 30-day clock expires, otherwise the vessel will incur a violation.

In the following discussion, all references to a vessel’s ability to opt out apply only to situations in which the deficits are less than the carryover allowance, unless otherwise noted.

A variety of circumstances may arise under which a vessel incurs a deficit. When a deficit is incurred early in the year, it may not be possible to acquire QP for certain species at a reasonable price because of uncertainties about bycatch rates and tight QP markets for constraining species. Later in the year QP could become more available. However, current regulations give the vessel two choices, each with potentially substantial adverse consequences: (1) incur a violation, including the penalty and subsequent consequences of a violation record, and preserve the opportunity to participate later in the year, or (2) leave the fishery and forgo all remaining opportunity for the year (unused QP might be sold off to other vessels).

The alternatives under consideration are as follows:

**Status Quo:** Vessels that have carried a known deficit for more than 30 days may avoid a violation by opting out of the fishery for the remainder of the year (so long as the deficit is less than the carryover allowance).

**Alternative (PPA):** Vessels that have carried a known deficit for more than 30 days may avoid a violation by opting out of the fishery (so long as the deficit is less than the carryover allowance). Such vessels may opt back in once they have cured their deficit.

The 30-day clock with the provision allowing vessels to opt-out for the remainder of the year was originally intended to encourage vessels to cover their overages sooner rather than later. However, as described above and portrayed in the following table, this provision create a situation in which a vessel which incurs a violation is allowed to continue in the fishery while a vessel which stays in compliance must opt out for the remainder of the year. Some view this situation as inequitable.

Table 1. Implications of the alternatives for vessels incurring a deficit that is within the carryover allowance.

Situation of Vessels Incurring a Deficit	Status Quo	Alternative
Vessel covers deficit within 30 days	Vessel <u>not in</u> violation. Vessel <u>can re-enter</u> the fishery as soon as deficit is covered.	Vessel <u>not in</u> violation. Vessel <u>can re-enter</u> the fishery as soon as deficit is covered.
Vessel <u>opts out</u> by 30 days and covers deficit later	Vessel <u>not in</u> violation. Vessel <u>must stay out</u> of the fishery the entire year.	Vessel <u>not in</u> violation. Vessel <u>can re-enter</u> the fishery as soon as deficit is covered.
Vessel <u>does not opt out</u> and covers deficit later	Vessel <u>in</u> violation. Vessel <u>can re-enter</u> the fishery as soon as deficit is covered.	Vessel <u>in</u> violation. Vessel <u>can re-enter</u> the fishery as soon as deficit is covered.

Vessels with deficits **greater than the deficit carryover allowance** may not avoid a violation by opting out by 30 days.

On the one hand the alternative to status quo might be perceived as more equitable. On the other hand changing the opt-out requirement (the alternative) might make the 30-day clock for covering a deficit less meaningful (the 30-day clock would be relevant only for those vessels with deficits greater than the carryover provision). If the vessel chooses to “opt out” there is no cost in doing so. Under the proposed alternative it could opt back in as soon as the deficit is covered, also at no cost. Since the vessel cannot fish while in deficit, the steps of opting out and opting back may not carry much meaning. However, the EC points out that the fleet is more aware of the 30-day requirement

than it is aware of the provision prohibiting fishing while in deficit and therefore has recommended that the 30-day requirement be maintained.

With respect to utilization of the opt-out provision the EC provided the following information in their November 2011 report:

To date there have been three events where a vessel was in deficit and approached the 30-day time period before covering their deficit. In two of these cases the deficit involved target species, and the vessel did not cover the deficit because it was participating in another fishery and chose to wait until the end of the 30-day period before covering their deficit. In the third situation, the deficit involved a large quantity of an overfished species. In all three situations the deficits were larger than the carryover amount (10 percent) and the vessels were not eligible to opt out.

While vessels have not been using the opt-out provision, it is uncertain whether or not they have had to pay higher prices for QP in order to avoid being forced into the opt-out/violation choice. The following table portrays some tradeoffs between the alternatives.

Table 2. Tradeoffs between status quo and alternative for changes to the opt-out provision.

Status quo	Alternative
A potential inequity from being forced to leave the fishery to maintain compliance while vessels that incur a violation are allowed to fish.	Elimination of a potential inequity.
The possibility of being forced to pay higher prices for QP because of the pressure to avoid having to choose between a violation and forgoing fishing for the year.	More time to shop/wait for a better QP price.
Incentive to resolve overages before 30 days.	Little incentive to resolve overages before 30 days.

<b>Summary: Status and Next Steps</b>	
✓	Originally prioritized for implementation in 2013. Now prioritized ASAP given workload constraints.
☀	Select a FPA.

### **3. Eliminate double filing of co-op reports (November and March) (Preliminary NEPA Determination: No Further NEPA Required)**

Currently both mothership and catcher-processor co-ops are required to submit to the Council a preliminary annual report in November and to NMFS a final annual report by March 31 of the following year. Since the fishery is not completed on time for the November meeting and a subsequent final report must be provided by March 31 of the following year, question has been raised about the necessity of providing the preliminary report.

**Status Quo:** Require that co-ops provide a preliminary annual report to the Council in November and a final annual report to NMFS by March 31 of the following year.

**Alternative (PPA):** Require that co-ops provide only final annual reports for a particular year but require that it be provided to both NMFS and the Council. The annual report must be provided to NMFS by March 31 of the subsequent year. The annual report should be provided to the Council on time for distribution with the April briefing book, i.e. by the briefing book deadline for the April Council meeting (but no earlier than March 10).

The original requirement for filing preliminary and final reports was patterned based on co-op filing requirements for Alaskan fisheries. The purpose of the requirement for filing a preliminary report is not apparent, and the filing of preliminary reports has apparently been eliminated in the Alaska program.

	<b>Summary: Status and Next Steps</b>
✓	Originally prioritized for implementation in 2013. Now prioritized ASAP given workload constraints.
☀	Select a FPA.

**4. Whiting season opening date and southern allocation (Preliminary NEPA Determination: EA)**

See also, Agenda Item I.4.a, Attachment 2.

Under a rationalized fishery, the previous rationale for varying start dates among areas and whiting sectors may no longer apply. As a first step, at its November 2011 meeting, the Council adopted for consideration the GAP and Trawl Rationalization Regulatory Evaluation Committee (TRREC) option of moving the whiting season start date for all sectors and areas to May 15, consistent with the start date for the at-sea fishery. The GAP recommendation, adopted as guidance by the Council, also stated:

The GAP also supports reviewing the overall whiting fishery management regime, including consideration of moving towards a year round fishery. If this adds significant workload, it should remain a priority for the TRREC to address for implementation in the Program Improvements and Enhancements (PIE) 3 rule or beyond.

Only the issue of moving the whiting season date to May 15 is part of the current action. The following are the options for consideration.

**Status quo:** No Action. The current regulations for the start date and southern allocation are as follows.

660.131(B)(2) Different primary season start dates. North of 40°30' N. lat., different starting dates may be established for the catcher/processor sector, the mothership sector, and in the Pacific whiting IFQ fishery for vessels delivering to IFQ first receivers north of 42°N. lat. and vessels delivering to IFQ first receivers between 42° through 40°30' N. lat. . . .

(iii) Primary whiting season start dates and duration. After the start of a primary season for a sector of the whiting fishery, the season remains open for that sector until the sector allocation of whiting or non-whiting groundfish (with allocations) is reached or projected to be reached and the fishery season for that sector is closed by NMFS. The starting dates for the primary seasons for the whiting fishery are as follows:

- (A) Catcher/processor sector—May 15.
- (B) Mothership sector—May 15.
- (C) Shorebased IFQ Program, Pacific whiting IFQ fishery.

- (1) North of 42°N. lat.—June 15;
- (2) Between 42°–40°30'N. lat.—April 1; and
- (3) South of 40°30'N. lat.—April 15.

660.55 (f)(2) . . . No more than 5 percent of the Shore based IFQ Program allocation may be taken and retained south of 42° N. lat. before the start of the primary Pacific whiting season north of 42° N. lat. . . .

**Alternative (PPA):** Use a single May 15 start date for all whiting sectors including California fisheries and eliminate the 5 percent California early season whiting fishery cap, to the extent that a fishery management plan (FMP) amendment is not required. This change would be implemented through the two-meeting process already authorized under the framework of the Pacific Coast Groundfish FMP.

	<b>Summary: Status and Next Steps</b>
✓	Originally prioritized for implementation in 2013. Now prioritized ASAP given workload constraints.
☼	Select a FPA or provide guidance on further development of alternatives and consider the process to be followed.

### 5. Chafing Gear (Preliminary NEPA Determination: EA)

See also, Agenda Item I.4.a, Attachment 3.

The chafing gear issue has been identified as a high priority for Council action. The following chafing gear alternatives were reviewed by the Council at its March 2012 meeting.

- Status Quo:** No Action
- Alternative 1:** Eliminate all chafing gear restrictions as they apply to midwater trawl gear gear (includes not only the cod end but the entire net).
- Alternative 2 (PPA):** Amend midwater trawl gear restrictions to allow for greater chafing gear coverage on the codend (status quo chafing gear regulations for the rest of the net).

Chafers may cover the bottom and sides of the codend in either one or more sections. Chafers can only be attached at the open end of the codend (end closest to trawl mouth) and sides. The terminal end (end closest to terminal end of codend) or the end of each chafer section if using multiple chafers must be left unattached. The only chafer allowed on the top codend panel would be reinforced netting panels under lifting, and constraining straps. All chaffers will conform to codend mesh size regulations.

	<b>Summary: Status and Next Steps</b>
✓	Prioritized for implementation in 2013.
☼	Select a FPA or provide guidance on further development of alternatives and consider the process to be followed.

## I.4.d – Council Action Template

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Following is a detailed list of action items for potential use in motion making.

1. **Council Action:** “1. Select final preferred alternatives for those trailing actions on which the Council is ready to move forward.”

PIE Rule 2, Council list (covered in this attachment)	Council Action
1. Allow fixed gear and trawl permits to be registered to the same vessel at the same time.	
2. Change the opt-out requirement for QP deficits	
3. Eliminate the double filing of co-op reports	
4. Whiting season opening date and southern allocation (also see Agenda Item I.4.a, Attachment 2)	
5. Chafing gear (also see Agenda Item I.4.a, Attachment 3)	
PIE Rule 2, NMFS list (covered in Agenda Item I.4.c, NMFS Trailing Actions)	
1. First receive site license changes	
2. Catch monitor certification requirements	
3. Start renewal process 9/15 for LE permit, vessel account, and QS permits	
4. Remove 12/15-31 ban on QP transfer	
5. Observer provider certification	
6. Clarify processor obligation	
7. Observer program regulatory changes	
8. Change “permit holder” to “vessel owner”	
9. Process for changes vessel ownership	

2. **Council Action: 2.** “Consider the need for a suspension of widow QS trading while widow QS reallocation is being considered and a possible calendar for consideration and implementation of that reallocation.”

3. **Council Action:** “3. Provide comment on study design for at-sea electronic monitoring and process for incorporation of results into the Council process.”