ENFORCEMENT CONSULTANTAS REPORT ON CONSIDERATION OF GEAR REGULATIONS FOR THE TRAWL CATCH SHARES

The Enforcement Consultants (EC) has reviewed Agenda Item H.2, Consideration of Gear Regulation Changes for the Trawl Sector and has the following comments.

Regarding Agenda Item H.2., Attachment 1, in general, the EC has minimal enforcement concerns with the alternatives being considered.

However, the EC has concerns with the table on page 5, in the box under "Gear Use" and "Maximum Retention." The current requirement is for sorting to occur prior to weighing. Suboption A of the alternative would add the requirement of sorting at sea by gear type. This would require enforcement to rely solely on observer or video data to determine if catch is properly sorted and documented as required.

PFMC 09/12/15