

GROUND FISH ADVISORY SUBPANEL REPORT ON SABLEFISH ELECTRONIC TICKET REPORTING REQUIREMENTS

The Groundfish Advisory Subpanel (GAP) received an update from Mr. Dayna Mathews, NMFS Office of Law Enforcement (OLE), on e-ticketing requirements.

The GAP supports **Option 3** from [Agenda Item F.6, Supplemental Attachment 1](#), “Draft Options for Meeting the 24-hour E-Ticket Reporting Requirement From Remote locations and/or After Business Hours on Weekends or Holidays.” This remains a problem for all sectors of the commercial fishery – fixed gear, open access and trawl in some places. Therefore, we suggest Option 3 apply to the entire commercial sector.

The GAP thanks Mr. Dayna Mathews and Mr. Dave Colpo for their document explaining work-around options for reporting that we can use now, however these will not be sufficient in the long-term.

Regarding OLE concerns about dilution of the time period and catch accounting, the GAP notes that under the current rules, some discretionary dilution occurs as OLE relies on a 48 hour reporting window unless submission anomalies are identified.

Enforcement Consultants suggested this has not been an issue during the five years of the trawl catch shares program. However, processors brought up this issue in 2009 and 2010 during the trawl IFQ program finalization. The issue was dropped at that time because NMFS was adamant the 24-hour rule was a requirement and trawl industry members recognized other issues were of greater concern to make the program more efficient.

Regarding NMFS OLE concerns about diluting the catch accounting, the GAP counters that it already is diluted because enforcement relies on a 48-hour reportage window for action. This would appear to invite those already out of compliance to take greater advantage of the system. Industry does not want to take that chance.

The GAP notes it would also help to have a link to the first receiver reporting page on the Pacific States Marine Fisheries Commission website.