## ENFORCEMENT CONSULTANTS REPORT ON COASTWIDE NON-WHITING MIDWATER AND GEAR MODIFICATION EXEMPTED FISHING PERMIT PROGRESS REPORTS

The Enforcement Consultants (EC) has reviewed Agenda Item F.8, Supplemental Attachment 1, as well as meeting with exempted fishing permit (EFP) applicants Mr. Brad Pettinger and Ms. Lori Steele. The enforcement concern identified with the EFP proposal involves the use of two trawl gear types during one trip: 1) bottom trawl gear outside the Trawl Rockfish Conservation Area (RCA); and 2) midwater trawl gear within the Trawl RCA and the challenge of confirming bottom trawl gear was not used within the Trawl RCA during the trip. Based on our discussion with the EFP applicants, the EC feels the above concern may be mitigated by enhancing the declaration process under the EFP to declare which gear type is being used at a given time. The question remains how to confirm the declaration corresponds with the gear being used. The EFP could test whether observer or electronic monitoring observations can confirm the type of gear being used.

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