

GROUND FISH ADVISORY SUBPANEL REPORT ON TRAWL LOGBOOK REQUIREMENT

The Groundfish Advisory Subpanel (GAP) heard a presentation from Mr. Todd Philips, Pacific Fishery Management Council (Council), on the recent rulemaking by the California Fish and Game Commission to rescind the state logbook requirement for trawlers participating in Federal groundfish fisheries. In order to continue the current data collection efforts necessary to manage the groundfish trawl Individual Transferable Quota program, the Council is tasked with considering a Federal logbook requirement. National Marine Fisheries Service (NMFS) has drafted regulations (Agenda Item I.3. Attachment 2) to create a Federal requirement for vessels operating under a limited entry trawl permit off the three West Coast states.

The GAP agrees that continuing to collect logbook information from Federal trawl participants is important and we support moving forward with the Federal requirement, if that is what is necessary to gather the information from California participants. The rationale provided by the California Fish and Game Commission (set out in the January 2, 2019 Final Statement of Reasons <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=165593&inline>) for the decision to repeal the state requirement is puzzling and inconsistent with how logbooks are actually used. The GAP questions why this rulemaking was supported by the California Department of Fish and Wildlife and others as it is taking up precious time and limited resources to implement the action.

The GAP does have some concerns and they include:

- Our understanding is that the intent of the action is to ensure that limited entry catcher vessels participating in the trawl individual fishing quota (IFQ) shoreside fishery are affected by this requirement, not the at-sea participants in the Mothership and Catcher Processor sectors. Unfortunately, this is not clear in the draft regulations. NMFS has indicated their intent verbally, but the draft regulations do not clarify whom the requirements pertain to.
- It is not entirely clear if the states of Oregon and Washington will continue to provide and collect logbooks or if they will transition to the Federal system as well.
- There is a financial impact to NMFS for moving forward with this action. The GAP reminds NMFS and the Council that logbook requirements preceded the trawl IFQ program and therefore this action should not be cost-recoverable.

Collecting logbook data is critical to many management functions, especially for our electronic monitoring programs, since the logbook is one of the primary tools for catch accounting. In conclusion, the GAP supports the Federal logbook requirement action moving forward with consideration given to the concerns regarding to whom it applies, and that the financial impact associated with the transition is not borne by the industry through cost recovery.