

ENFORCEMENT CONSULTANTS REPORT ON COMMERCIAL DIRECTED FISHERY  
REGULATIONS FOR 2020

The Enforcement Consultants (EC) have reviewed the material associated with Agenda Item F.2, Commercial Directed Fishery Regulations for 2020, and have the following comments.

**IPHC Proposal A2 ([IPHC-2019-IM095-PropA2](#))**

The EC concurs with changing the overall season so that it runs from April to October/November. The hard start/stop dates facilitate long-range planning for enforcement.

The EC does not object to extending the non-Indian directed commercial fishery from a 10-hour derby to a 2-day fishery (34-hour derby with proposed start of 0800 hours on the first day and end time on the second day of 1800 hours). Under the current pulse operation model, a 10-hour derby requires a 4-day dedicated enforcement effort and a 2-day fishery will require 5 days of focused effort to ensure compliance with the regulations. The additional time required includes both shoreside and at-sea monitoring of the 72-hour pre-soak closure, hold inspections, the fishery itself, and offloads.

If the derby is extended beyond 2 days, enforcement will likely need to shift to a regular enforcement model, which would include random patrols and spot checks versus a dedicated enforcement effort. Enforcement resource constraints prevent a pulse for a fishery any longer than 2 days, which is of concern in this high value fishery. An additional EC concern is the potential area/social conflict with the recreational fishery if the commercial season starts earlier or overlaps with recreational openers, which is more likely under a 5-day opener with the potential increased fishing dates for the recreational fishers.

With all that said, the EC still recommends maintaining the status quo fishery of a 10-hour opener until the transition from International Pacific Halibut Commission to Pacific Fishery Management Council management.

PFMC  
11/16/19