

ENFORCEMENT CONSULTANTS REPORT ON COMMERCIAL DIRECTED FISHERY TRANSITION PLANNING

The Enforcement Consultants (EC) have reviewed the material associated with Agenda Item F.3, Commercial Directed Fishery Transition Planning. In general, the International Pacific Halibut Commission (IPHC) 2019 regulations have minimal enforcement concerns, with a few exceptions. Specific comments are below, with the paragraph from the regulations listed:

Licensing (para 5.6): The EC recommends that the regulations continue to require a hard copy license be carried on the vessel while engaged in fishing to facilitate enforcement and expedite at-sea boardings.

Continuous Offload (para 13.2): The EC strongly supports retaining the single, continuous offload requirement. Multiple offload locations facilitates skirting the regulations and makes it challenging to track landing limits. Pacific halibut is the only species that requires single, continuous offload due to the individual value per fish of the species.

Length/Class (para 13.5): The EC recommends requiring the licensed length of a vessel to be the official length on the vessel's U.S. Coast Guard (USCG) Certificate of Documentation or state Certificate of Number. Due to vessel size driving trip limits in the non-Indian directed commercial fishery, there is a significant incentive for vessels to stretch up to the next length class. Using already established length from USCG and state regulations simplifies the process for enforcement and industry.

Vessel Monitoring System (VMS) (para 16.16): The EC recommends adding a requirement for vessels participating in any commercial halibut sector to carry VMS. This will facilitate enforcement, particularly given the shift to a longer non-Indian directed fishery.

Logs (para 17.4): The EC recommends removing the log exemption for incidental Pacific halibut fishery during the salmon troll season.

72-hour pre-season closure and hold inspections (para 20.7-8): The EC recommends retaining the 72-hour pre-season closure and hold inspections.

Generally, for enforceability, it is preferential to complete as many regulation changes as possible simultaneously. For example, if the seabird avoidance measures implemented for other Pacific Fishery Management Council (Council) longline fisheries will be included in the Pacific halibut fishery regulations, we recommend doing so during the transition from IPHC to the Council.