ENFORCEMENT CONSULTANTS REPORT ON TRANSITION OF AREA 2A FISHERY MANAGEMENT

The Enforcement Consultants (EC) have reviewed the material associated with Agenda Item F.3 Draft range of alternatives for the proposed transfer of management responsibilities for the Area 2A Pacific Halibut Fishery, and have the following comments.

The EC is supportive of the alternatives in this document but would like to highlight one section in particular. Section 3.3.5 Proof of Permit. The EC would like to recommend maintaining both Alternatives under Proof of Permit with an emphasis on Alternative 2.

The EC would prefer the regulations maintain the current status quo requiring a hard copy of the license to be carried on the vessel at all times to facilitate enforcement and expedite boarding both at sea and dockside. Electronic documentation of licenses is inconsistent and can create extra work and uncertainty during boardings because electronic access may be interrupted or unavailable. For these reasons, the EC recommends the alternatives be restructured to indicate that regardless of what other technologies or approaches are used to provide proof of a permit, a hard copy license must be carried on board.

PFMC 03/05/20