The Enforcement Consultants (EC) have reviewed the material associated with Agenda Item E.2, Transition of Area 2A Fishery Management – Final Actions. The following are our comments:

**Timing (Agenda Item E.2. Attachment 1, Section 4.1.):** The EC supports the recommended change to 4.1.2 Alternative 2, and believes considering the directed fishery framework during the Halibut Catch Sharing Plan process in September and November will address the notification and timing concerns we expressed in our September 2020 EC Supplemental Report to Agenda Item I.2. This timing ensures industry and enforcement have time to review and incorporate any changes into our respective planning processes.

**Proof of Permit (Agenda Item E.2. Attachment 1, Section 4.2.5):** The EC supports the recommended changes to 4.2.5 Alternative 1. The EC believes requiring participants to have “proof of permit” versus “paper proof of permit” be readily accessible will provide flexibility and ease the burden on industry yet enable compliance.

The EC has provided several other reports related to the transition of Halibut management from International Pacific Halibut Commission to the Council, including under November 2019 Agenda Items F.2 and F.3, September 2020 Agenda Items I.1. and I.3 and November 2020 Agenda Items E.1. and E.3.

PFMC
11/13/20