

ENFORCEMENT CONSULTANTS REPORT ON NATIONAL MARINE FISHERIES
SERVICE REPORT

The Enforcement Consultants (EC) have reviewed the documents pertaining to Agenda Item C.1.a. Supplemental National Marine Fisheries Service (NMFS) Report 2, Groundfish Fixed Gear Logbooks, and has the following comments. The EC recognizes the Pacific Fishery Management Council's (Council's) recommendation to the NMFS to initiate a mandatory logbook requirement for the limited entry and open access fixed gear fishing fleets.

Per the report, NMFS intends to implement a fixed gear logbook requirement for both targeted and incidental open access fisheries that use fixed gear in Federal waters (i.e., 3-200 nautical miles from the West Coast), including the directed halibut fishery that retains groundfish under open access trip limits.

Several fixed gear vessels retain groundfish in both state and Federal waters on the same fishing trip and are required to adhere to the cumulative limits regardless of where the groundfish were taken. These groundfish are required to be landed and documented on a fish ticket. The vessels retaining groundfish in Federal waters are also to have a Vessel Monitoring System (VMS) installed and in use. There are also fixed gear vessels that fish in state waters only for groundfish and are also required to land and document their catch on fish tickets.

The EC is concerned with a logbook requirement that only applies to fish caught in Federal waters and would prefer consistent logbook requirements for both state and Federal waters. Enforcement personnel would not be able to enforce the quality and completeness of a logbook when a portion of a trip were caught in state waters. Fish tickets would remain the only accurate accounting of the landing, and enforcement would be reliant on VMS to determine which trips had a portion occur in Federal waters to ensure logbooks entries were completed.

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