

ENFORCEMENT CONSULTANTS REPORT ON DRIFT GILLNET FISHERY HARD CAPS

The Enforcement Consultants (EC) have reviewed the documents associated with Agenda Item G.4 Drift Gillnet Fishery Hard Caps and provide the following comments related to Alternative 3 - In-Season Individual Vessel and Fleetwide Closures:

The EC is concerned with the potential complexity associated with the notification and tracking of closures associated with individual vessel caps. While fleet closures are typically announced in the Federal Register with set effective dates that are enforceable, individual vessel closures may require documentation of the actual vessel owner notification date. This unique notification date may require tracking the 14-day, 30-day, or season closure by vessel, which includes not only the vessel involved in the take, but also the vessels that were determined to be unobservable. Multiple species caps being reached during the same season further complicates tracking individual vessel closures. Should notification occur while the vessels are at sea, the EC notes the closure would also require an offload within four days of the effective date of closure. The EC also recommends using the term “closure” rather than “cease fishing” to align with West Coast Highly Migratory Species fishery regulations.

PFMC
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