

ENFORCEMENT CONSULTANTS REPORT ON SABLEFISH GEAR SWITCHING

The Enforcement Consultants (EC) have reviewed the material associated with Agenda Item H.3, Sablefish Gear Switching, including [H.3.a. Supplemental REVISED NMFS Report 2](#), and have the following comments:

The EC recommends consideration of administrative adjustments to overages under Alternatives 3 and 4. We recommend allowing coverage within a set number of days with purchase of additional quota pounds, or allowing an overage of up to a certain percent of remaining balance (e.g. 10 percent), or allowing an overage of up to a set amount (e.g. 500 lbs) before being considered a violation and referred to enforcement. Alternatives 3 and 4 do not appear to address how overages would be addressed. For Example, overages of up to 10% or 500 lbs could be administratively reduced from the following year's quota. Overages above the percent or weight allowances would be referred to enforcement.

PFMC
11/04/22