

ENFORCEMENT CONSULTANTS REPORT ON
FIXED GEAR MARKING AND ENTANGLEMENT RISK REDUCTION - FINAL ACTION

The Enforcement Consultants (EC) have reviewed reports associated with Agenda F.5 Fixed Gear Marking and Entanglement Risk Reduction - Final Action and have the following comments:

The EC has made prior statements on this topic, including [F.6.a Supplemental EC Report 1](#) at the March 2024 Council meeting, and appreciates that the majority of the EC's recommendations were considered when selecting the Preliminary Preferred Alternatives (PPA).

Regarding [F.5 Attachment 1](#) and [F.5 Attachment 2](#), Gear Marking, the EC supports the PPA for both Buoy and Line Marking.

Buoy Marking:

The EC supports the PPA, Alternative 1, Suboption B - Cattle-ear tag on each buoy, with vessel identification information. The EC suggests regulatory language concerning the cattle-ear tags on each buoy similar to:

Each buoy used to mark fixed gear must have an attached durable, non-biodegradable tag securely attached to the buoy that is permanently stamped/engraved with legibly marked numbers, where there is a physical indentation along with a contrasting color (e.g. manufactured or applied with ink/paint over the engraved numbers). The numbers on the tag may be either the vessel documentation number issued by the US Coast Guard (USCG), or, for an undocumented vessel, the vessel registration number issued by the state. If the tag information is illegible, or the tag is lost for any reason, the gear is not in compliance.

It is the experience of the EC that printed markings (e.g. written with a "Sharpie" or hand painted) will fade over time, sometimes within weeks or months. Whereas, stamped/engraved markings should last for years with continued use in marine environments.

Line Marking:

The EC supports the PPA's identified in Alternative 1. Regarding Alternative 1, Suboption D - Transition Period: Should the Council consider a transition period with temporary markings, the EC suggests the shortest amount of time practicable.

Regarding F.5 Attachments 1 and 2, Entanglement Risk and Reduction Alternatives, the EC provides the following comments:

Surface Gear Requirements:

The EC recommends selection of the No Action alternative and is not supportive of Alternative 1, which would allow the surface gear to only be marked at one end. As noted in our March 2024 statement, the EC recommends maintaining the requirement that both ends of the gear be

marked with surface gear. Marking one end would make it difficult to enforce as unmarked portions of the gear could be set in a closed area (e.g. Rockfish Conservation Areas or Essential Fish Habitat). In addition to the closed area concerns, there are examples of gear being lost, crossed and/or tangled during longline fisheries.

Surface Line Length Restriction:

The EC is supportive of the PPA.

Regarding Administrative/Other Items:

The EC is supportive of the proposed changes related to **Escape Panel Requirements** and creating a definition for collapsible pots (e.g. Slinky pots).

Application to Directed Commercial Halibut Fishery.

While not included in this action item, the EC recommends that gear marking provisions required for the groundfish fixed gear fisheries also be applied to the directed commercial halibut fishery. This will help eliminate confusion and ensure consistency in fisheries using similar types of gear.

PFMC
06/09/24