

**GROUND FISH ADVISORY SUBPANEL REPORT ON FIXED GEAR MARKING AND
ENTANGLEMENT RISK REDUCTION – FINAL ACTION**

The Groundfish Advisory Subpanel (GAP) reviewed the gear marking documents and our past statements. The summary of our gear marking and entanglement risk reduction recommendations for final action are contained in the following table. Any changes and additional explanations follow.

Table 1. GAP recommendations

Buoy Marking	GAP Recommendation for FPA
No Action: No marks required	Alt 1., Subopt. B: Same as PPA
Alternative 1: Gear Specific mark	
Suboption a: patch, shape, letter on buoy	
Suboption b: cattle-ear tag on each buoy, with vessel identification information (PPA)	
Line Marking	
No action: No line marking required	
Alternative 1: Gear specific marking	
A. Portion of line marked	Alt. 1, Opt. A-1; Same as PPA
1. Vertical line only (PPA)	
2. Vertical and Surface line	
B. Distance (length) of mark (of vertical line)	Alt. 1, Opt. B-2; Same as PPA
1. At least top 5 fm	
2. At least top 20 fm (PPA)	
C. Method of marking	Alt. 1, Opt. C-1 Same as PPA AND Alt. 1, Opt. C-2a CHANGE from PPA
1. Manufactured line (PPA)	
2. Temporary marking (of vertical line)	
a. At least every 2 fm	
b. At least every 5 fm	
c. At least every 10 fm	Alt. 1, Opt. D-2; CHANGE from PPA
D. Transition period from temporary to manufactured line	
1. No transition, manufactured line required upon implementation (PPA)	
2. 5-yr transition	
3. 10-yr transition	
4. Temporary markings and manufactured line allowed indefinitely	
Surface Gear Requirements	
No Action: Surface gear required at both ends of gear	
Alternative 1: Surface gear required at only one end (PPA)	Alt. 1; Same as PPA

Surface Line Length Restriction	
No Action: No maximum surface line length	
Alternative 1: Limit amount of surface line length to	
a. 5 fm	
b. 10 fm (PPA)	Alt 1, Sub. b; Same as PPA
Escape Panel Requirements	
No Action: No change to escape panel regulations	
Alternative 1: Add clarification for escape panel regulations to prohibit panel placement on bottom of pot, with exception for slinky pots (PPA) Suboption a: Change thread count of biodegradable escape panel from No. 21 or smaller to No. 30 or smaller	Alt. 1, Same as PPA and include suboption a

GAP Discussion

Most of the GAP recommendations are consistent with the Council’s Preliminary Preferred Alternatives (PPAs). The discussion below will identify Final Preferred Alternative (FPA) recommendations different from the PPAs and/or past GAP reports, and expand on rationale for PPAs on which we agree, simply for clarification and documentation.

Buoy and Line Marking

Alternative 1, Option B: Cattle ear tag on buoy: During the GAP discussion that included dialogue with NMFS staff, it was indicated that the National Marine Fisheries Service (NMFS) could determine the color/size/shape of required cattle tags and line if no color/size/shape was specified by the Council. The GAP understands the Enforcement Consultants (EC) are recommending engraved/stamped buoy tags for the vessel identification information, but suggests NMFS consider other indelible methods in the rulemaking that may be able to be seen from afar.

Alternative 1, Option D-2: 5-year transition period: This GAP recommendation is different from the Council’s PPA of no transition period. In March, the GAP proposed no transition period, but further discussion of availability of permanent line and other factors prompted the GAP to propose a transition period of five years or less.

The reasoning is twofold: 1) increased compliance (and decreased potential for violations) across the fleet, especially for those participants who have difficulty accessing manufactured line; and 2) lessening the environmental impact of line being discarded before it is worn out (when it could be fully utilized with temporary marking). Temporary marking would eliminate that discarding issue. The EC mentioned there is an existing system of different colored line schemes in many East Coast fisheries that could be used as a blueprint. The GAP discussed how, by using some of these combinations, manufactured line may be more readily available compared to developing new multi-colored rope schemes.

Alternative 1, Option C-2-a: Temporary line marking frequency: With the selection of Option D-2 (5-year transition), there must be the selection of both C1 (Manufactured Line) and C2 (Temporary Markings) options. For temporary line marking frequency, the GAP recommends Option C2a, no more than 2 fm between marks but would encourage continuous markings.

Funding

The GAP continues to request that the NMFS look at funding sources to help supply buoy tags and manufactured line to the fleet. Specifically regarding manufactured line, this would increase compliance for those vessels that may not be in a financial situation to purchase the line. With funding, the GAP also believes this would likely shorten the transition time.

Entanglement Risk Reduction

The GAP and EC had good discussions around the idea of using one set of surface gear as opposed to two, as is now required. The advantages of a single set of surface gear includes: decreased chances of interaction with other ocean surface users; the ability to coexist in an area with the midwater trawl fleet; decreased pot loss because snarls occur close to the buoyed ends (especially the end at the opposite end of the direction of the current); and, most importantly, reduced entanglement risk.

Given these positive outcomes, recognizing that fishery participants have strong motivation to not lose gear, and realizing that this is an option and not a requirement, the GAP hopes the Council will move this option forward. With vessel monitoring systems and robust communication of gear locations among ocean users already occurring between sectors, the GAP is confident that gear interactions and enforcement will be negligible.

Escape Panel Regulations

Alternative 1: Include sub-option A: Biological degradable twine size: The GAP supports the PPA clarifying language requiring biodegradable escape panel placement to not be in the bottom of a pot with an exception for slinky pots. The GAP would like to see the addition of sub-option A, changing the maximum allowed biodegradable twine size from 21 to 30, in order to further align regulatory language with Alaska included within the FPA.

Best Practices Guide

The GAP continues to express its support for a best practices guide if the time, energy, and funding become available. There are many enthusiastic fishermen with good ideas ready and willing to help.

PFMC
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