

SALMON ADVISORY SUBPANEL REPORT ON
COMMERCIAL FISHERY REGULATION CHANGES:
VESSEL MONITORING SYSTEMS, SEABIRD AVOIDANCE AND CATCH REPORTING –
FINAL

The Salmon Advisory Subpanel (SAS) discussed the proposed non-Tribal directed commercial Pacific halibut (DC halibut) fishery management measures (Agenda Item G.2) and appreciates the opportunity to comment.

The SAS reiterates their comments made in June 2023 ([Agenda Item E.1.a, Supplemental SAS Report 1](#)) and September 2024 ([Agenda Item F.2.a, Supplemental SAS Report 1](#)) on the vessel monitoring systems (VMS), seabird avoidance measures, and catch reporting. The SAS provides the following additional considerations:

Vessel Monitoring Systems:

- The SAS **supports *No Action / Status Quo***. The SAS opposes requiring VMS on vessels participating in the DC halibut fishery. The salmon troll fleet sees little benefit in requiring this when compared to the cost to purchase and operate VMS. The cost would be significant for potential new entrants or an individual considering switching from participation in the incidental salmon troll fishery to the DC halibut fishery. Area closures are well defined and should be easy to patrol.

Regarding seabird avoidance measures:

- The SAS **supports *No Action / Status Quo***. Streamer lines cost money and take time to deploy and no seabird conservation risk has been identified for the DC halibut fishery at this time.

Catch Reporting:

- The SAS **supports *No Action / Status Quo***. The SAS opposes modifications to commercial catch reporting requirements for Pacific halibut.
- For the DC halibut fishery, all of the required information is already recorded and there is no clear benefit or additional biological or fishery information that would be gained by this action.
- For incidental landings in the salmon troll fishery, additional reporting requirements could add additional work, particularly on buyers. Also, incidental landings of halibut in California are very minimal.

The SAS thanks the Council for the opportunity to provide comments on the above items.