

ENFORCEMENT CONSULTANTS REPORT ON WORKLOAD AND NEW MANAGEMENT MEASURES PRIORITIES

The Enforcement Consultants (EC) have reviewed reports associated with Agenda Item H.8 Workload and New Management Measures Priorities and have the following comments.

The EC participated in a joint Groundfish Advisory Subpanel/Groundfish Management Team (GAP/GMT) session and received a briefing from Council staff, and has previously provided the following statements: [Agenda Item G.4.a, Supplemental EC Report 1, March 2019](#); [Agenda Item I.2.a, Supplemental EC Report 1, June 2019](#), and [Agenda Item F.8.a, Supplemental EC Report 1, March 2023](#). The EC has the following specific comments related to proposed worklist items included in [H.8.a GMT Report 1](#) and [H.8.a GMT Report 2](#), but defers to the Council and other advisory bodies on the need to keep the other items discussed in the GMT Reports.

B3. New Dressed and Round Conversion Factors for Sablefish.

The EC supports action that promotes consistency in conversion rates between state and Federal regulations. Currently, the EC is not aware of any confusion with fishers, buyers, managers, and enforcement. We all use a 1.6 conversion rate along the West Coast. If conversion factors are changed based on cut, then clear distinction and definitions of each type of cut will need to be established.

B8. Permitting Commercial Sale of Recreational Fish Waste

The EC recommends keeping this item in Table B. In our [March 2019 Agenda Item G.4.a Supplemental Report 1](#), the EC outlined the Federal regulations prohibiting the sale of recreationally-caught groundfish, including those parts that have been discarded or abandoned. The EC understands the request to allow States to establish regulations that would allow the collection of waste at fish cleaning stations and use that waste to produce commercially sold products including fish meal, fertilizer, fish oil etc., is still active. The intent of the request is to reduce the amount of waste discarded at the port. As noted in our March 2019 statement, the EC recommends the addition of recreationally caught salmon to this worklist item since that sale of recreationally caught salmon is also prohibited ([see 50 CFR 660.405.\(a\).\(10\)](#))

B9. Salmon VMS Ping Rate

The EC continues to advocate for the 15-minute ping rate. The EC will evaluate any proposed changes and make a recommendation based on current regulations related to operating in groundfish conservation areas.