



NOAA
FISHERIES

2024 Trawl Rationalization (TRat) Compliance Summary

**NOAA Office of Law Enforcement
West Coast Division**

March 2025

2024 TRAWL RATIONALIZATION (TRat) COMPLIANCE SUMMARY

NOAA Office of Law Enforcement - West Coast Division

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TABLE OF CONTENTS

2024 TRAWL RATIONALIZATION (TRAT) COMPLIANCE SUMMARY	3
• TABLE 1. 2024 TRAWL RATIONALIZATION (TRAT) COMPLIANCE STATISTICS -NONWHITING	4
• TABLE 2. 2024 TRAWL RATIONALIZATION (TRAT) COMPLIANCE STATISTICS -WHITING.....	5
• TABLE 3. 2024 TRAT PARTICIPATION.....	6
• TABLE 4. 2024 TRAT ELECTRONIC MONITORING PARTICIPATION	7
• TABLE 5. 2024 TRAT ACCOUNTS / LICENSES / E-TICKETS.....	8
• TABLE 6. 2024 UNITED STATES COAST GUARD (D11/D13) TRAT ENFORCEMENT.....	9

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The Pacific Coast Groundfish Trawl Catch Share Program, also called the Trawl Rationalization (TRat) Program, consists of an Individual Fishing Quota (IFQ) Program for the shorebased trawl fleet, and cooperative programs for the at-sea mothership and catcher/processor trawl fleets. NOAA Office of Law Enforcement (OLE) West Coast Division (WCD) conducted a review of permit and law enforcement data for calendar year 2024 to produce compliance statistics for both the shorebased nonwhiting IFQ (Table 1) and shorebased and at-sea cooperative IFQ whiting (Table 2) TRat programs. Data received from the Pacific States Marine Fisheries Commission (PSMFC) and West Coast Groundfish Observer Program are included in this report and provide additional TRat statistics pertaining to participation and landing rates among the different fishery sectors over the past three years (Tables 3-5). Data submitted by the United States Coast Guard Districts 11 and 13 (USCG-D11/D13) presents a snapshot of their West Coast Living Marine Resources (LMR) and general living marine resource enforcement mission effort over the same time period (Table 6).

Compliance review of the shorebased groundfish IFQ (nonwhiting) and whiting trawl sectors was implemented through separate searches of NOAA's Pacific Coast Fisheries Permit System and OLE's case management system (CMS) databases to identify commercial fishing vessels and fish processors registered with a West Coast Groundfish Limited Entry Permit (LEP) that were also connected to a recorded and closed enforcement incident in 2024. This includes incidents that were referred to OLE by USCG and state enforcement partners. Each of the enforcement incidents were then evaluated to 1) determine which sector the vessel or processor was participating in, and 2) assess the disposition of the action(s) subsequently taken.

The sector compliance rate is calculated as the ratio of the number of incidents that did not result in enforcement actions beyond compliance assistance* - such as a written warning, Notice of Violation and Assessment (NOVA), summary settlement, or settlement agreement - to the total number of closed OLE investigations.

Analysis of the 94 closed enforcement incidents associated with the 2024 shorebased groundfish IFQ trawl fishery yielded an 81% compliance rate for the nonwhiting trawl sector; and an 88% compliance rate for the 16 closed incidents that were connected to first receiver sites (Table 1). The five categories of all groundfish LEP regulations with the highest number of multiple violations in 2024 were: *Observer - Impede/Interfere/Resist/Oppose/Refusal*: 13; *Economic Data Collection (EDC) Issue*: 10; *Recordkeeping and Reporting Requirements*: 9; *Vessel Monitoring System (VMS) Issue*: 5; and *Electronic Monitoring (EM) Vessel Monitoring Plan (VMP)*: 5.

For the groundfish LEP whiting assignment trawl fleet that includes catcher vessels delivering to both mothership and shorebased IFQ first receiver sites, mothership vessels, and catcher processor vessels, 36 enforcement incidents were identified in the OLE CMS. Twenty-five of the 36 incidents reviewed were attributed to west coast catcher vessels. The 2024 compliance rate for the whiting catcher vessel fleet is 79%; 86% for mothership vessels; and 100% for the catcher processor vessels. The categories of violations with multiple occurrences among the 2024 whiting sector catcher, mothership, and catcher processor vessels were: *EM Vessel Monitoring Plan (VMP) Issue*: 6; *Fishing in Deficit*: 2.

*Compliance Assistance is not considered as a prior violation if a compliance record is required to determine permit eligibility.



Table 1. 2024 Trawl Rationalization (TRat) Compliance Statistics – NONWHITING

2024 TRAWL RATIONALIZATION COMPLIANCE STATISTICS: NON-WHITING						
Groundfish Limited Entry Permit (LEP)	Groundfish Trawlers			First Receiver Sites		
PERMITS	2022	2023	2024	2022	2023	2024
General Groundfish	117	134	87	49	48	38
Groundfish and Whiting				14	(No Designation)	
Whiting-Only				1		
CONTACTS						
Complaints / Referrals	19	28	57	24	10	9
Investigations / Boardings / Audits	47	55	39	1	0	7
INCIDENTS						
Non-Whiting Enforcement Incidents	66	79	96	25	10	15
Carry-Over Non-Whiting Enforcement Incidents	5	7	21	1	2	1
ACTIONS						
No Violation / Lack of Evidence	29	41	37		1	6
Compliance Assistance	27	32	39	20	7	8
Written Warning	1	1	7	2		1
Summary Settlement	2	1	10		2	1
NOVA / Settlement Agreement	3	1	1	1		
Transferred to Another Agency		2	2			
Ongoing Investigation	9	3	18	3	3	6
VIOLATIONS						
Observer - Impede / Interfere / Resist / Oppose / Refusal	7	11	13			
Economic Data Collection (EDC) Issue		1	10	18	8	
Recordkeeping and Reporting Requirements		3	9			
Vessel Monitoring System (VMS) Issue	17	12	5			
Vessel Monitoring Plan (VMP)	1	2	5			
Declaration Issue		2	4			
Fishing in Deficit	4	2	3			
Closed Area	1	2	3			
Observer - Fail to Notify			2			
Protected Species			2			
Retention of Prohibited Species			1			
Catch Monitor Not Present During Offload				4		1
Permit Not Onboard		2				
Noncompliant Discard						1
Overage	1	1				
Observer - Sexual Harassment	1				1	
Observer - Intimidate / Harassment	1					
Current First Receiver Site License (FRSL) Not Posted				1		
COMPLIANCE RATES						
	2022	2023	2024	2022	2023	2024
<i>CLOSED</i> Non-Whiting Enforcement Incidents	62	83	94	23	9	16
No Violation / Dismissed	29	41	37	0	1	6
Compliance Assistance	27	32	39	20	7	8
	90%	88%	81%	87%	89%	88%



Table 2. 2024 TRat Compliance Statistics – WHITING

2024 TRAWL RATIONALIZATION COMPLIANCE STATISTICS: WHITING									
Groundfish Whiting Assignment LEP Permits	Catcher Vessels*			Mothership Vessels			Catcher Processor Vessels		
PERMITS	2022	2023	2024	2022	2023	2024	2022	2023	2024
Whiting Assignment / Endorsement	32	35	30	6	7	6	6	11	11
CONTACTS									
Complaints / Referrals	6	15	7	3	3	5	3	5	3
Investigations / Dockside Boardings	27	20	15	1		2	3	2	1
INCIDENTS									
Enforcement Incidents	33	35	22	3	7	5	6	7	3
Carry-Over Whiting Enforcement Incidents	1	3	3		3	2		3	1
ACTIONS									
No Violation / Lack of Evidence	19	16	15		1	4		4	4
Compliance Assistance	11	10	4		3	2	3	2	
Written Warning		2	3						
GCES Settlement Agreement / NOVA	1	1	1						
Summary Settlement			2						
Transferred to Another Agency					1	1			
Ongoing Investigation	3	6	1	3	2		3	1	
VIOLATIONS									
Vessel Monitoring Plan (VMP)		2	6						
Fishing In Deficit	4		2						
Economic Data Collection (EDC) Issue		5	1						
Vessel Monitoring System (VMS) Issue	5	2	1				2		
Observer - Failure to Provide Reasonable Assistance	1				1		1		
Observer - Impede / Retain Prohibited Species		2			2			2	
Observer - Sexual Assault/Harassment					1				
Catch Monitor Not Present During Offload		1							
Closed Area	1								
Permit Not On Board	1	1							
COMPLIANCE RATES									
	Catcher Vessels*			Mothership Vessels			Catcher Processor Vessels		
	2022	2023	2024	2022	2023	2024	2022	2023	2024
CLOSED Whiting Enforcement Incidents	31	32	24		5	7	3	6	4
No Violation / Lack of Evidence	19	16	15		1	6		4	4
Compliance Assistance	11	10	4		3		3	2	
	97%	81%	79%	N/A	80%	86%	100%	100%	100%

*Vessels delivering to both mothership and shorebased IFQ first receiver sites.

Table 3. 2024 TRat Participation

TRat Participation

ALL SHOREBASED SECTORS

	Vessels	Landings*
2024	61	1,670
2023	77	1,918
2022	82	2,027



Shorebased IFQ Whiting

	Vessels	Landings*
2024	25	730
2023	27	860
2022	26	904

Mothership Catcher Vessels

	Vessels	Trips**
2024	9	15
2023	17	22
2022	20	30

Shorebased IFQ Trawl

	Vessels	Landings*
2024	46	853
2023	56	918
2022	66	992

Catcher Processor Vessels

	Vessels	Trips**	Hauls
2024	10	17	1,269
2023	10	18	1,648
2022	9	17	1,709

Shorebased IFQ Fixed Gear

	Vessels	Landings*
2024	9	87
2023	12	141
2022	12	130

**Trips = Unique Seasons (i.e. spring & fall)

*Landings = Individual Fish Tickets

Table 4. 2024 TRat Electronic Monitoring Participation

TRat Electronic Monitoring Participation

ALL SHOREBASED SECTORS

	Vessels	Trips
2024	41	1,110
2023	45	1,242
2022	44	1,289



Shorebased IFQ Whiting

	Vessels	Trips
2024	26	875
2023	27	814
2022	25	863

Shorebased IFQ Trawl

	Vessels	Trips
2024	9	162
2023	10	175
2022	13	193

Shorebased IFQ Fixed Gear

	Vessels	Trips
2024	6	73
2023	7	74
2022	8	89

Mothership Catcher Vessels

	Vessels	Trips**
2024	8	20
2023	16	20
2022	18	27

** # Trips = # Unique Seasons (i.e. spring & fall)

Table 5. 2024 TRat Accounts / Licenses / E-Tickets

TRat Accounts / Licenses / E-Tickets

Accounts

	Quota Share
2024	164
2023	169
2022	169

	Vessel
2024	135
2023	143
2022	140

Licenses

	First Receiver Sites
2024	38
2023	48
2022	45



E-Tickets

	Total Landings	California	Oregon	Washington
2024	1,670	325	1,136	209
2023	1,918	416	1,264	238
2022	2,027	439	1,326	262

E-Ticket Transmission Rate

	≤ 48 Hours
2024	99.6%
2023	97.9%
2022	98.4%

Table 6. 2024 USCG (D11/D13) TRat Enforcement

USCG (D11/D13) TRat Enforcement

Commercial Groundfish Vessel Boardings

	Boardings	Trawlers
2024	17	6
2023	36	10
2022	38	7



Combined Boat, Cutter, and Aircraft Resources

	Hours
2024	7,492
2023	8,694
2022	11,397

TRat Related Violations

	Violations	Trawlers
2024	0	0
2023	0	0
2022	0	0