

GROUND FISH ADVISORY SUBPANEL REPORT ON COUNCIL RESPONSE TO PRESIDENTIAL EXECUTIVE ORDERS AND ADMINISTRATION UPDATES

The Groundfish Advisory Subpanel (GAP) reviewed the documents under this agenda item and discussed potential ideas with Council Deputy Director Kelly Ames and Staff Officer Jessi Waller and determined some of the GAP's ideas and suggestions have already been mentioned or addressed.

The GAP's highest priorities are discussed under Agenda Item E.7, Supplemental GAP Report 1 (Harvest Specifications Flexibility). While that item is likely to address the policy/management items in the near term (and the GAP recommends it be scheduled as soon as possible for next steps), the remaining items on stock assessment and science issues are of the utmost importance for the GAP. Some of these items may be considered under the Terms of Reference or Stock Assessment Planning items scheduled on the [preliminary Year-at-a-Glance \(YAAG\) schedule](#), but others will likely need to be considered in conjunction with the report from the Stock Assessment Process report.

Outside of those items in "Spex Flex" and associated items for stock assessments, the GAP also expressed interest in the following (in no particular order):

1. Trawl Catch Share Program follow-on-actions: The GAP realized this has not been scheduled on the [Preliminary YAAG schedule](#) but it is important to get any follow-on actions from that review into regulations as soon as possible. This will make the trawl catch share program more efficient in the long run and increase the opportunity and profitability for trawl program fishermen and processors. The [Trawl Catch Share Program Review Workshop summary](#), at which trawl industry representatives voluntarily met to discuss ideas and help support the Council's review process, .
2. Move the midwater rockfish exempted fishing permit (EFP) into regulation: While this was recommended as a groundfish priority by the Council in March 2025, it has yet to be scheduled on the YAAG. This EFP has collected eight years of data and it has been a constant frustration for the GAP on a clear indication of when an EFP has gathered enough information to make the provisions in an EFP – in this case, gear changes and access to different areas -- moved into regulations. The GAP recommends NMFS consider moving this EFP into regulation outside of the Council process in order to meet the EO's intended goals of stabilizing markets, improving access, and enhancing economic profitability.
3. The ability to turn off Vessel Monitoring Systems (VMS): Currently, fishermen who need to have VMS units on their vessels cannot turn them off and must pay for the service year-round. However, if a fisherman wants to use the boat for a non-fishing activity, or when the boat is tied to the dock, or to fish a season in a fishery that doesn't require VMS, there is no option to turn it off and must still pay for the service, even if they have officially declared out of the fishery. Turning off the VMS service for days or months at a time will decrease the cost and allow for more efficiency in fishing operation.

4. Re-examine how cost recovery regulations are implemented: While ideally, the requirement for cost recovery would be removed from the Magnuson-Stevens Act, the GAP recommends the Council consider how the cost recovery regulations have been implemented at the Pacific Council. As noted in the GAP's [March 2025 Statement on the NMFS Report](#) (Agenda Item H.1.c), as an example, the MS sector had the highest cost recovery percentage implemented in the year with the lowest associated revenue.
5. Streamline monitoring in the trawl fishery: Currently, the trawl catch share program is subject to 200% monitoring, with vessels monitored at 100% (electronic or human observer) and 100% monitoring when the catch is delivered shoreside. Streamlining this by eliminating shoreside catch monitoring and/or reducing vessel monitoring to a level that is statistically reliable for fisheries management would decrease costs to fishermen and processors, thereby creating greater efficiencies in the catch share program. Alternatively, changing the certification requirements for shoreside monitors, as outlined in [Supplemental Information Report 3, April 2025](#) (Trawl Program Review Workshop Summary), could provide much needed cost savings.
6. Remove non-trawl Rockfish Conservation Areas (RCAs): This is a tool held over from management regimes more than 20 years ago. Since that time, the Council and NMFS have developed more discrete forms of management, like specific block area closures, that can be used instead. Additionally, accessing these areas will relieve pressure on current areas and provide fishermen more flexibility.
7. Remove trawl RCA off Washington: Similar to the suggestion to remove non-trawl RCAs, removing the trawl RCA off Washington would decrease the cost and increase the efficiency of trawl vessels off Washington. Fishery managers have much better tools for more discrete area management and the trawl fishery operates under a catch share program, with full catch accountability. Additionally, footrope restrictions already provide habitat protections. In other words, fishing effort will not be concentrated in one area off the coast of Washington and fishermen wouldn't consistently be bumping up against RCA boundaries.
8. Allow rolling annual catch limits (ACLs): Consider a revision to National Standard 1 by which catch could be compared against the total harvest specifications across two fishing years. Total mortality is already assumed when setting harvest specifications, but current carryover guidance prevents rollover above the Year 2 OFL. A rolling annual catch limit would allow for *full* carryover of unutilized fish that is already assumed to be dead.
9. Allow vessels with groundfish aboard to fish for non-groundfish species in areas closed to groundfish fishing: Vessels seeking to fish for highly migratory species such as tuna, seaward of groundfish areas must return to port to offload groundfish before pursuing fishing for tuna. This adds to fuel expense to vessels and boats lose time and opportunity, perhaps missing an active bite, by having to run miles back to port before offloading and running back offshore.
10. Allow for Vessel Monitoring System (VMS) declaration changes at sea: While a few vessel declarations can currently be changed at sea, the Council should change the policy so that all declarations can be changed at sea. Similar to #9, this would alleviate the need to run back to port to make the declaration, then return to sea to fish.

The GAP would also like to bring attention to the fact that many of the issues facing fisheries and impeding competitiveness on the domestic and international markets are outside the Council's purview. Even so, the GAP feels that it is important to highlight this in the event that other agencies that could positively affect American fisheries would benefit from the immense wealth of knowledge the Council and its advisory bodies possess. Examples of this include

tariffs and infrastructure, which are major factors in achieving the stated goals of the EO that would be well informed by Council and advisory body input.

PFMC
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