

HIGHLY MIGRATORY SPECIES ADVISORY SUBPANEL REPORT ON  
EXEMPTED FISHING PERMITS – PRELIMINARY OR FINAL

The Highly Migratory Species Advisory Subpanel (HMSAS) recommends that the National Marine Fisheries Service (NMFS) approve the PIER-Hookless Deep-set Ring Exempted Fishing Permit (EFP).

The HMSAS believes there remains a need to increase flexibility in operation of an EFP, provided that such flexibility can be accommodated within environmental review processes and analyses. NMFS should be able to change the terms and conditions of an EFP in a timely manner based on reports and/or requests from EFP holders. Examples include:

- The ability to add vessels to fish EFP configuration types endorsed by the Pacific Fishery Management Council and approved by NMFS so long as consistent with effort limitations in existing environmental analyses.
- The ability to fish at different depths and times due to bait presence and other on-the-water observations could improve the catch per unit effort of EFP activities.
- Conditions may impact the ability of an EFP holder to access marketable species based on distance from shore limitations. Fishermen are in the best position to adjust gear deployments given variable ocean conditions and location of marketable and/or bycatch species.
- If the Hookless Deep-Set Ring EFP proves effective, enable testing of this new terminal tackle in any EFP configuration as to expedite testing and data collection on this approach.