

ENFORCEMENT CONSULTANTS REPORT ON WORKLOAD AND NEW  
MANAGEMENT MEASURES PRIORITIES INCLUDING  
TRAWL FOLLOW-ON PRIORITIES

The Enforcement Consultants (EC) have reviewed the documents pertaining to Agenda Item C.5, Workload and New Management Measures Priorities including Trawl Follow-on Priorities and has the following comments.

The EC attended a joint session of the Groundfish Advisory Subpanel (GAP) and Groundfish Management Team (GMT) regarding this agenda item 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 \(June 2019\)](#), [Agenda Item F.8.a, Supplemental EC Report 1 \(March 2023\)](#), and [Supplemental EC Report 1 \(March 2025\)](#). The EC has the following specific comments related to proposed worklist items included in [Agenda Item C.5, Attachment 1](#).

**A4. Commercial Sale of Recreational Fish Waste**

The EC recommends keeping this item in Table A. 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))

**B1. 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.

**B4. 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.