

GROUND FISH ADVISORY SUBPANEL REPORT ON  
FINAL REVIEW OF EXEMPTED FISHING PERMITS (EFPs) FOR 2011

The Groundfish Advisory Subpanel (GAP) reviewed the exempted fishing permits (EFPs) information and reiterates our September statement regarding the Oregon Department of Fish and Wildlife (ODFW) EFP:

**ODFW Yelloweye Rockfish in Sport Charter Fishery EFP**

This EFP, in our opinion, needs no modifications. This is the only way to obtain any yelloweye information – information sorely needed for future analysis and stock assessments.

We understand this EFP has been pulled due to changes in yelloweye specifications for 2011 but would like to see this EFP resubmitted in the future. We recognize the data collected from this program is primarily nearshore data. Information collected by the Trawl Individual Quota Program will primarily be offshore data. A combination of both would provide more robust data.

Furthermore, the GAP wishes to remind the Council that a problem still exists with a current EFP. The Regulatory Flexibility Analysis (RFA) Oregon yellowtail EFP has had a cap imposed for the target species, yellowtail rockfish, due to necessary allocation requirements. This cap is of insufficient size (3.8 mt) to prosecute this EFP. The cap needs to be set at least 8 mt. Yellowtail rockfish continues to be an underutilized and abundant species. It is requested that the Council and/or NMFS pursue a process-compliant remedy to this oversight.

Regarding modification of the EFP process, the GAP again suggests the duration of any EFP be for one year from the date of permit issuance instead of issued for a calendar year. Applicants would then have the opportunity to make plans for fishing, get observers, and be able to fish year-round. For instance, one applicant received a permit with a duration from September to December – well past the prime season for fishing and obtaining qualified information.

As an alternative, the GAP suggests the Council consider beginning discussion on changes to EFP operating procedures so permits are in effect for two years and match the biennial harvest specification cycle. The two-meeting EFP process could be started in March and culminate with a final Council decision in June, at the same time the final specifications are made. There are several advantages to this:

- Annual staff workload would be reduced.
- Observers would be available after their March training sessions.
- Applicants could make plans for any fishing season.
- Specifications cycle and permits would be in sync.