

GROUND FISH ADVISORY SUBPANEL REPORT ON GENERAL GROUND FISH FISHEY  
AND TRAWL RATIONALIZATION ISSUES TO BE ADDRESSED BY THE NMFS  
PROGRAM IMPROVEMENTS AND ENHANCEMENT (PIE) RULE

The Groundfish Advisory Subpanel (GAP) received a report from Mr. Jim Seger and Ms. Jamie Goen on the Program Improvement and Enhancement (PIE) rule and the Trawl Rationalization Regulatory Evaluation Committee (TRREC). After receiving the report from Ms. Goen and Mr. Seger and reviewing Agenda Item I.7b Supplemental NMFS Report 2, the GAP understands that several of the items in that document are not ripe for decision. Referring to those items (numbers 2, 3, 4, 5, and 9) the GAP offers no specific recommendations, but appreciates National Marine Fisheries Service (NMFS) highlighting those issues and looks forward to providing comment at the appropriate time. Referring to the items that are ripe for decision, we offer the following specific comments.

Issue 1 – Consideration of revisions to requirement for observer coverage until offload complete – The GAP prefers option 2 (observer and skipper agree to the number of constraining species prior to departing the boat). Option 2 is easy to comprehend, will prevent misunderstanding, does not require weights, and will save the fleet significant amounts of money by allowing the observer to depart the boat before offloading occurs.

Issue 6 – Consideration of a process to allow end of year resolution of accounts – The GAP recommends the NMFS-preferred option (option 2). It is the least disruptive, is not administratively burdensome, and will enable carryover pounds to be distributed in an appropriate timeframe.

Issue 7 – Clarification that first receiver has to complete and submit an electronic fish ticket before the fish leaves the offload site – The GAP believes it may be difficult for some first receivers to submit an electronic fish ticket. This may be due to the remoteness of the site and lack of internet access. It may also be due to the fact that site managers may not be comfortable with computers. The GAP requests an option that would authorize a central processing plant to fax a blank fish ticket to the first receiver site, have the first receiver site manager fill in the blank form, and then fax that back. We believe that would not compromise the need to have a fish ticket completed before the fish leaves the offload site.

A related issue that may arise is the time it takes to offload, particularly for large loads (e.g. whiting). There may not be space at the site for the trucks to load and hold the product in order to offload a complete trip. Likewise, a processor may not have enough totes to hold a large load. It is imperative to clear space and that some product move while offloading is still occurring. If a fish ticket number could be assigned to the entire load and individual bills of loading assigned to each truck, we could maintain the accuracy and completeness of the fish tickets without impairing the normal operations of a processor/first receiver site.

Issue 8 – Mandatory requirement to fill out ex-vessel value on electronic fish ticket – The GAP supports the requirement to fill out ex-vessel value on fish tickets. The confounding part of the

issue is the timeliness of submitting the ex-vessel landing value. After polling processors, the GAP has determined that three weeks would be a reasonable time period for this requirement.

Issue 10 – Adding “first receiver” to list in conflict of interest regulations for catch monitors and catch monitor providers – The GAP agrees that first receivers should be in the conflict of interest regulations and that the absence of first receivers in that list was a simple oversight.

#### TRREC committee

The GAP believes the TRREC needs to be narrowly focused in both composition and charge in order to be most effective. At present, the group seems overly large and cumbersome. The GAP recommends narrowing the focus of the committee solely to shoreside trawl issues. The GAP also recommends changing the composition of the group as specified below. Specifically, the GAP recommends the following make-up: 1 shoreside trawler from each state, 1 additional at-large trawler (preferably with shoreside whiting expertise), 1 processor, 1 NMFS Office of Law Enforcement, 1 NMFS Northwest Region, 1 National Oceanic and Atmospheric Administration General Counsel, 1 state enforcement officer from one of the three states, and 1 Council staff.

The GAP believes the highest priority for the TRREC should be to focus on regulatory artifacts of the old management system that have the potential to limit the success of the trawl rationalization program. Such issues include, but are not limited to, gear regulations (e.g. two seam net required shoreward of the Rockfish Conservation Area [RCA] may impede gear innovation that reduces bycatch), RCA boundaries, the individual fishing quota holding requirement, and the whiting season start date. In order to keep the committee as small as possible, and the charge as narrow as possible, the GAP recommends that the committee not address issues that are allocative in nature or have crossover connotations.

The GAP notes TRREC meetings will be open public meetings allowing for input from other stakeholders, and also notes that all recommendations will still need to go through the complete Council process providing ample opportunity for soliciting comment from all sectors and stakeholders.

PFMC  
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