
Enforcement Committee Minutes

C3 IFQ Sablefish Release Allowance



ENFORCEMENT COMMITTEE MINUTES

- Committee found the analysis and the discussion helpful
- Analysis focused on Alternative 2
 - Eliminate regulatory restrictions prohibiting release of sablefish caught by sablefish IFQ vessels and allow for voluntary discards
 - At-sea enforcement would include observing fishery operations and ensuring sablefish not retained are returned to sea immediately, with minimum of injury and accurately reported in the logbook
 - Primary compliance tools include at-sea boardings, observed trips, and EM
 - Careful release regulations would need to be specific



ENFORCEMENT COMMITTEE MINUTES

- Committee noted the analysis discussed the potential need for increasing observer/EM coverage to better determine sablefish discard mortality estimates.
- Committee noted there could be differential bias due to high value of larger fish and different behavior for observed trips and unobserved trips which suggest a need for increased observer coverage
- The increased observer/EM coverage would aid compliance monitoring and enforcement efforts associated with observer/EM reported violations



ENFORCEMENT COMMITTEE MINUTES

- Committee discussed potential action the Council might take in authorizing sablefish discards in future iterations of this action, such as size limits
- This would create additional enforcement concerns due to limited compliance monitoring tools available
 - Primary tools are limited to at-sea boardings, observed trips, and EM trips
 - Committee discussed the added cost that would be incurred to review EM video for illegal discards
 - Currently EM technology is not able to identify illegal discard (size limit) to the accuracy/fidelity required as evidence to support a violation for prosecution



ENFORCEMENT COMMITTEE MINUTES

- Committee agreed that risk will need to be addressed in a future analysis and be reviewed
 - Need to ensure regulations or other management structures do not create unintended mismatch between sablefish discard accounting and discard reporting and monitoring mechanisms
 - Enforcement and management rely on the same monitoring tools (observer, EM, logbooks) to accomplish their mission regarding sablefish discard monitoring/reporting
 - Potential issues include:
 - Accuracy of trip-level discard reporting
 - Observer involvement in compliance and observer bias effect at fishery level vs vessel level
 - Cost of reviewing EM video
 - Ability of EM technology to determine size of discards, and
 - Monitoring/reporting requirements mandated by other statutes (e.g., Marine Mammal Protection Act)

