

Conceptual Framework for Monitoring Pollock Trip and MRA Overages to Control Vessel Behavior: 2020 Mid-water Pollock Trawl EM EFP

Objective: This framework is intended to formulate flexible enforcement steps over the course of the EFP to curtail potential abuse of exemptions to the GOA pollock trip limit and BSAI-GOA MRAs. The goal is to control behavior so that vessels continue to mostly stay under the limits over the long term, yet provide added flexibility that is needed due to the full retention requirement of the EFP.

Overage Monetary Surrender: All participating EM EFP vessels will be required to surrender the ex-vessel value above the prescribed limits (GOA 300,000 pollock trip limit and GOA-BSAI maximum retainable amounts as published in Table 10 and Table 11). Processors will be allowed to process the overages and sell the product – they would be responsible for remitting any overage proceeds to the North Pacific Fisheries Research Foundation on behalf of the project administrators to help fund continuation of the EM project into the future.

GOA POLLOCK TRIP LIMIT OVERAGES

Vessels will be allowed up to three (3) offenses (pollock trip overages). Upon a fourth overage offense, the vessel will be removed from the EFP participating vessel list. They may also be prohibited from participating in any future EM Pollock EFP.

Definitions and actions:

Any egregious trip overage (> 345,000 pounds) will constitute an offense regardless of circumstances.

Other offenses will be determined by averaging every 4 pollock trips over the course of the year (excluding any trip >345,000 lbs). The trip average restarts after every 4 consecutive pollock trips: if the average catch over four consecutive trips is above 300,000 pounds, the vessel will be charged with an offense.

Actions for offenses:

- 1) *First Offense:* average of a 4 trip set (excluding any trips >345,000 lbs.) >300,000 lbs: Contact vessel and count this as the first overage offense.
- 2) *Second Offense:* Notice the vessel that they have again exceeded the trip limit standard and count this as the second overage offense.
- 3) *Third Offense:* Notice the vessel that they have again exceeded the trip limit standard and count this as the third overage offense. Vessel pays a monetary penalty of \$1,000 to the North Pacific Fisheries Research Foundation.
- 4) *Fourth Offense:* Notice the vessel that they have again exceeded the trip limit standard; vessel is no longer allowed to participate in the EFP and must comply with all regulations (observer coverage, pollock trip limit, MRA's, PSC discards).

Note: The egregious trip overages and average trip overages are additive with a maximum of four offenses allowed under the EFP before expulsion. Vessel operators/owners are encouraged to

contact project management if they believe an overage was due to unusual circumstances beyond the operator's control.

BSAI-GOA MRA OVERAGES

Vessels will be allowed up to three (3) offenses (MRA overages). Upon a fourth overage, the vessel will be removed from the EFP participating vessel list. They may also be prohibited from participating in any future EM Pollock EFP.

MRA overages can be due to fishing conditions (e.g. excess of MRA species such as sablefish in the system so therefore difficult to avoid) or due to a vessel's fishing behavior.

Overage definition: Compare incidental catches to the pelagic pollock fleet overall (BS, Western GOA and Central GOA fleets independently) to determine if incidental catches (both discarded catch and retained catch) are problematic for all or most fishery participants in that area. If problematic overall, then continue to monitor EM vessel overages but take no further action. If an individual vessel overage stands out in comparison to other vessels then these incidents will be considered overages if valued at >\$250. Overages will be monitored on a trip by trip basis.

Actions for offenses:

- 1) *First Offense:* Contact vessel and issue an MRA overage when two overages have occurred.
- 2) *Second Offense:* Notice the vessel that they have again exceeded two MRA overages and issue another MRA overage.
- 3) *Third Offense:* Notice the vessel that they have again exceeded an MRA and issue a third MRA overage offense. Vessel pays a monetary penalty of \$1,000 to the North Pacific Fisheries Research Foundation.
- 4) *Fourth Offense:* Vessel is no longer allowed to participate in the EFP and must comply with all regulations (observer coverage, pollock trip limit, MRA's, PSC discards).

Note: Vessel operators/owners are encouraged to contact project management if they believe an overage was due to unusual circumstances beyond the operator's control.