

General Comments

- Better data collection
- Increased observer program demands
- Analytic concerns
 - Different tools needed
 - Results may not be comparable
- DSEIS concerns

PDT Criteria

- What is the primary fishing mortality control?
- Is the proposal an input or output based system?
- Is the method of allocation clearly stated?
- Is there a mechanism for accountability?
- Is the proposal narrow in focus?
- Can the proposal be analyzed?
- What issues will need to be addressed during development?
- Are there major hurdles?

DAS Changes

- *Eliminate conservation tax for DAS transfer program* – May increase effective fishing effort
- *Eliminate/reduce rolling closures* – Recent catch rate data not available for time/area closure areas
- *Allow scallopers to acquire groundfish permits* – May involve equity issues
- Timing issues relative to returning DAS
- Calculation of differential rate
- May increase incentive to discard
- Discards need to be accounted for
- May increase incentive to misreport landings

LAPPs/ITQs

- Cannot currently link landings to DAS call-in activity
- Difficult to limit quota ownership and quota acquisition
- Required referendum
- Observer coverage
- Qualification calculations could not begin until May 1, 2008
- Reauthorization requires consideration of an auction for initial allocation.
- M-S Act requires cost recovery for any IFQ

LAPPs/ITQs (cont.)

- Calculation of initial shares
- What happens if TAC for a stock is reached
- Overage provisions for may not be possible
- Definition of qualifying A DAS
- Qualification period encourages fishing for history
- Can't see how the floor can work
- Language implies discards will not be counted
- Removing upgrade provision may change existing fleet composition
- Cannot enforce forfeiture of proceeds upon overage
- Does not consider bycatch caps in other fisheries.
- Social/economic impacts relies on assessment of qualifiers/non-qualifiers/ quota shares – timing issues

Area Management

- Legal authority to grant smaller groups management control
- Legal authority to charge industry for monitoring
- Proposed association/coop membership may not be consistent with revised M-SA RFA definitions.

Area Management

- Determination of areas
- Allocation of TACs to areas
- Transition to and implementation of local management
- Possible enforcement concerns with different measures in different areas
- Local authority compliance with legal requirements
- Rec sector interaction
- New M-S LAP provisions: do they apply? If so, how?
- Interactions with monkfish/skate fisheries
- What if there are alternative organizations in one area?
- Fairness and equity standard may not apply to all issues- e.g. TACs, boundaries

Point System

- Assumes a high level of stock biomass understanding and certainty; safeguards must account for uncertainties.
- May require new ways of thinking about observers, enforcement (at sea and shoreside) and landing procedures.
- Command-and-control style management of Biological Point Values
- Total points (BPVs) allocated may be insufficient to protect weak-link stocks. High BPV differentials to protect such stocks may lead to discarding
- Quantitative impacts analysis may be difficult and/or uncertain

Point System (cont.)

- Voluntary Points Contribution Program
- Are vessel upgrade restrictions necessary
- Hailing/landing/offloading procedures
- Why not full retention of all fish?
- Are points used for discarded (sub-legal) fish?
- Initial assignment of BPVs may be difficult
- Periodicity of BPV changes?
- Observer coverage funding
- Feasibility of landings monitoring
- Interactions with monkfish and skate plans