

**PROPOSAL 43**

**5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.**

Repeal provisions allowing operation of 200 fathoms of drift gillnet from a vessel with two CFEC permit holders onboard, as follows:

Not a new regulation. I am asking the Board of Fish to repeal the regulation allowing dual permits from the same vessel, Repeal the entire 5AAC 06.333 , "Requirements and Specifications for the use of 200 fathoms of drift gillnet in Bristol Bay."

**What is the issue you would like the board to address and why?** Prohibit the use 200 fathoms of gillnet by dual permit holders.

1) The economics of the BB drift gillnet fishery have improved beyond the point where it is necessary to have two permit holders operating from from the same vessel. The ex vessel price for sockeye salmon has increased enough that a drift permit holder can make good revenue from operating the original 150 fathom of drift gillnet gear. Historically the regulations of the Bristol Bay drift fishery have tried to maintain equity in harvesting potential of the drift boat operators. The dual permit system has separated the fleet into two economic classes. Dual permit operators generally have a substantially higher income than the single permit holders. This has lead to overcapitalization of the drift fishery.

2) A dual permit vessel can effectively cork off a single permit vessel with the extra 50 fathoms of net. Prior to the dual permit system the corked vessel could tow to one side and continue to harvest salmon without having to haul their net and reset in a different location.

3) There is a significant amount of fraud in the dual permit system where an established operator is the purchaser of the second permit. The operator makes a side agreement with a deckhand to act as the second permit holder without the second permit holder actually providing financing to purchase and own the second permit. This is against the spirit and potentially a violation of Limited Entry Act regulations. CFEC Commercial Fishing Permit Brochure, "The Alaska Legislature made it illegal to lease permits to ensure that fishermen could maintain control of their own livelihoods and to ensure permits would be controlled by active fishermen with a long-term stake in conservation of fishery resources. Allowing leasing could create a class of permit holders who would be absentee landlords of the fishery who could exploit the actual fishermen forced to lease their permits."

4. The dual permit system has artificially inflated the price of Bristol Bay Drift limited entry permits and emergency transfers..

**PROPOSED BY:** Timothy Gervais

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