

Members of the Board

Thank you for considering my RC on RC51 which I see a potential problem with. I am concerned that what has been proposed here doesn't match recently federal regulations for slinky pot escape mechanisms that were very recently deliberated and created through the North Pacific Fisheries Management Council process.

I would suggest that the escape mechanism regulations match the federal regulations for effectiveness, simplicity, enforcement, and to minimize extra cost to fishermen. The federal regulations **"allows the door of the collapsible slinky pot to be wrapped with biodegradable twine. The biodegradable twine would not have to be 18 inches in length, but the door must be a minimum of 18 inches in diameter"**.

During the AC process I assumed that the RC the AWT said they were working on would match federal regulations but what I read in RC51 doesn't seem to at all. In the limited public comment on the proposal, I see several groups raised concerns that the RC language wasn't available to review and now I see that may have ended up limiting public input on this important rule. I do think matching federal regulations would be the best.

Here is a [link to the Federal Regulation](#) that are effective as of 12 days ago, 2/27/23. The rule is under the "Collapsible Slinky Pot Exception" and I've copied it below for you to read.

### ***Collapsible Slinky Pot Exception***

*Each groundfish pot must have a biodegradable panel that is at least 18 inches (45.72 cm) in length and use untreated cotton thread of no larger size than No. 30 ( i.e., biodegradable twine). This final rule amends regulations at § 679.2 to allow for the biodegradable panel to be placed anywhere on the mesh of a collapsible slinky pot. Per the Council's recommendation, this regulation allows the door of the collapsible slinky pot to be wrapped with biodegradable twine. The biodegradable twine would not have to be 18 inches in length, but the door must be a minimum of 18 inches in diameter. This final rule adds the descriptors "rigid or collapsible" to the definition of "Pot gear" at § 679.2 in paragraph (15)(i) of the definition of "Authorized fishing gear" so that both types of pots are expressly included in this definition.*

*The changes above are limited to collapsible slinky pots in the IFQ and CDQ fisheries. The final rule does not affect groundfish pot gear used in non-IFQ or non-CDQ groundfish fisheries, nor rigid pot gear used in the IFQ and CDQ fisheries, which remain subject to the existing biodegradable panel placement requirements in the definition for "Authorized fishing gear" in paragraph (15)(i).*

Thank you so much for your efforts and consideration,

Brett Roth  
PWS Sablefish Fisherman  
Federal IFQ Holder