

C2 Annual Observer Report

The SSC received a presentation on the 2022 observer program annual report from Jennifer Ferdinand (NOAA-AFSC) and Phil Ganz (NOAA-AKRO). Public testimony was provided by Julie Bonney (Alaska Groundfish Data Bank). The SSC thanks the presenters for the summary and response to questions.

The SSC notes that the annual observer report outlines the general design, planning and reporting process, fees and budget including per-day deployment costs, deployment performance review, compliance and enforcement, and NMFS recommendations for next year's deployment. The 2022 observer report was abbreviated (as was the 2021 report) and did not include a full evaluation of deployment. This is intended to be a temporary situation to facilitate work on evaluating sampling design and cost efficiencies that may be incorporated into the 2024 Annual Deployment Plan (ADP). The SSC last reviewed a full annual observer report in June 2021 (the 2020 report).

The SSC recognizes the large scope of the North Pacific observer program (the largest in the nation), as well as the challenges of covering a diverse set of fisheries across a broad geographical area and congratulates the program on largely achieving training and deployment targets.

The 2022 deployment rates for strata in partial coverage were:

- No Selection – 0%
- Trawl vessels not participating in the EM Exempted Fishing Permit (EFP) – 30%
- Hook-and-line (HAL) – 19%
- Pot – 17%
- Fixed-Gear EM – 30%
- Trawl vessels participating in the EM EFP –
 - 100% at-sea EM
 - In addition, 33% shoreside monitoring

Actual coverage rates were lower than expected for *EM HAL*, *EM POT*, and *HAL* strata. The lower rate in the *EM HAL* and *EM POT* strata was caused by not all the video being reviewed at the time the report was compiled, in part due to staffing issues. The lower rate in the *HAL* stratum was due to operators canceling selected trips and waivers issued by NMFS. Of the *HAL* trips selected for observer coverage in 2022, 41.5% were canceled by the operator; the highest cancellation rate since gear-based strata were implemented in 2016. **The SSC supports the NMFS recommendations to address video quality issues (of 2022 hauls reviewed 57% had high image quality, 17% was medium video quality, and 26% was low or unusable video quality) and possibly remove vessels from the EM program if needed. The SSC also supports further evaluation of the high rate of HAL trip cancellations.**

The SSC appreciates the reporting on costs of the different types of observer coverage (full, partial or EM). The report provides the average cost per observer sea day in the partial coverage category of \$1,492 (based on the cost of \$4,428,624 for 2,968 observer days) for 2022. The average cost per day of observer coverage in the full coverage category in 2022 was \$395. Both of these represent the highest per day cost since 2014. **The SSC recommends working toward a similar cost per day calculation for EM coverage, including prorated costs for existing equipment that could be compared over time and to the full and partial**

coverage rates, noting that the data output/quality is not comparable across these different modes of observation.

The SSC appreciated the summary of compliance and enforcement. The SSC notes its continued support for maintaining safe and professional working conditions for observers, and also ensuring high data quality. The SSC recognizes that every single safety incident is important. The SSC was particularly concerned with the 243% increase of occurrences per assignment in Intimidation, Coercion, and Hostile Work Environment from 2021 to 2022. **The SSC supports the FMAC recommendation that a time series of compliance and enforcement information be provided to better understand trends in the data beyond year-over-year comparisons. Further, the SSC requests additional detail to help clearly identify the most important differences in numbers and rates between years.** A figure including stacked bars and both the total number of deployments and incidents, which would illustrate both the rate and the magnitude, may be helpful. **Further, the SSC recommends delineating enforcement statistics (especially sexual harassment) by gender and including this information in the annual report so that can be used to assess the experience of what is likely an underrepresented group in Alaska fisheries.**^{1,2} The SSC further encourages the authors to consider decomposition of its aggregate enforcement statistics based on other available information such as race, ethnicity, and/or tenure to provide a fuller picture of experiences of potentially underrepresented groups within the program and Alaska fisheries more broadly. The SSC highlights that these more descriptive measures and figures may be helpful to NOAA OLE in evaluating the efficacy of their harm reduction interventions.

The SSC supports the NMFS recommendations for the 2024 ADP, including addressing the high cancellation rates and video quality compliance. The SSC strongly supports the integrated approach to monitoring and data collection across all approaches and suggests that efforts continue to make sure the assessment authors have sufficient input to maintain data streams necessary for subsequent analyses.

The SSC appreciates the preview of the ongoing ADP development, and generally supports the concepts and ideas presented for 2024 but did not review specific proposals and/or details of this ADP. **The SSC would appreciate the opportunity to review future ADP analyses far enough in advance to benefit from any potential recommendations.**

The SSC recommends that future observer annual reports contain a statistical evaluation of potential observer effects (as was included in the 2020 and 2018 annual reports); this information is critical to understanding the success of the previous year and for evaluating the deployment plan for the upcoming year. Understanding whether there are potential differences between observed and unobserved fishing activity is fundamental to the use and interpretation of these data.

The SSC has the following additional recommendations:

- The SSC recommends providing a performance evaluation that is clearly linked to each of the 13 proposed metrics that were identified as useful for evaluating “optimal” performance. A ‘stop light’ or report card may be an efficient way to summarize this information in addition to the quantitative elements (actual numbers). The SSC would value seeing the mathematical or statistical formulas that are used to derive the individual performance metrics.
- In the annual report, it is important to separate out the mortality of prohibited species in the maximized retention category in contrast to that occurring in the observer category. The term

¹ Statistic presented could follow those in the recent US EEOC report: <https://www.eeoc.gov/data/sexual-harassment-our-nations-workplaces>

² Tracking representation in various fisheries activities has been identified as a need at the international level: <https://www.fao.org/3/a-i6623e.pdf>

“discards” was confusing in the table when these two categories were mixed. Mortality rate would appear to be 100% in the maximized retention category, while it has the potential to be less when a prohibited species is observed, counted and discarded back into the ocean at sea.

- The SSC requests estimates of the fraction of the catch by gear and coverage type that is potentially sampled by the observer (e.g., when only one observer is present on a vessel how much catch is processed while the observer is not working), noting that all of this catch is currently reported as “monitored”.
- The SSC notes the importance of observer recruitment and training and recommends that a metric describing turnover would be helpful for cost and enforcement evaluation.
- Description of protected resources and prohibited species incidents occurrences (e.g., seabird avoidance) would benefit from a time series for context rather than simply raw counts for the year reported.