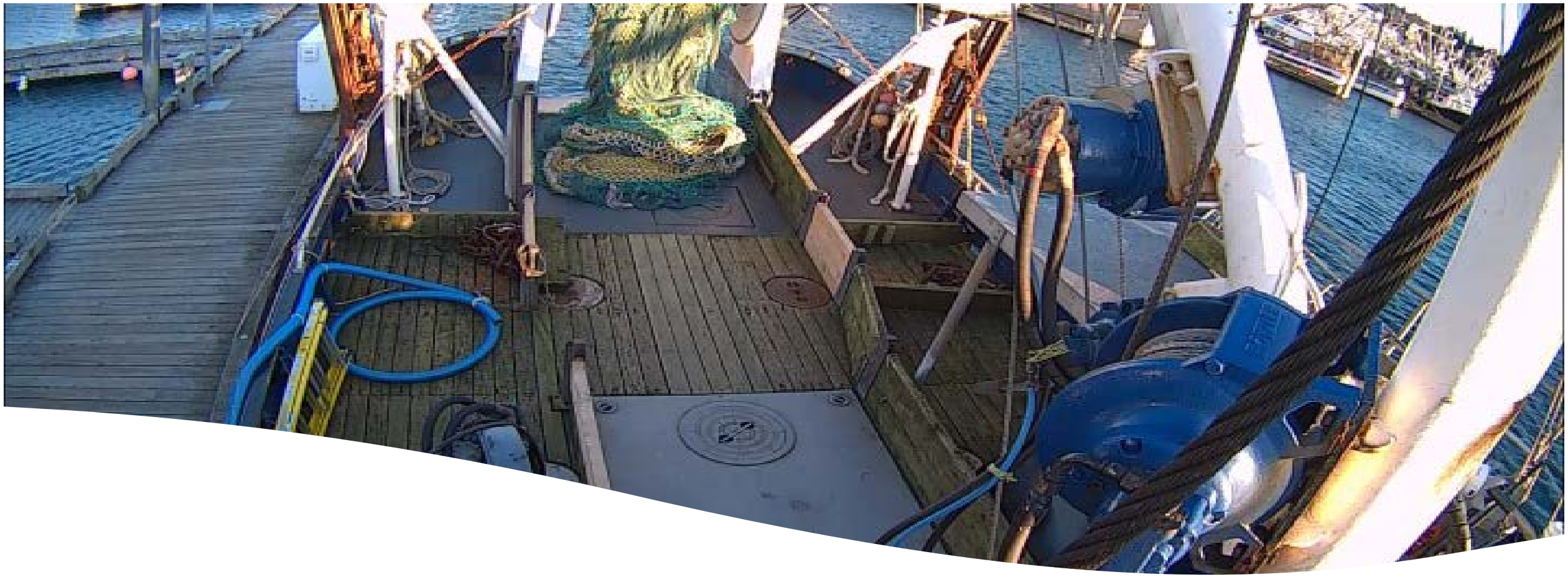


BS & GOA Pollock EM Exempted Fishing Permit
EM Committee September 2020

Lessons Learned, Challenges, and Recommendations for EFP Modifications for 2021

Lessons Learned, Challenges and Recommendations for EFP Modifications for 2021 -- Outline

- Communications
  - Direct communication with affected participants
  - EFP Team Meetings
  - PI Educational Sessions
- Data Inputs
- Shoreside Observers
- EFP Execution
- Tenders and Mobile Systems
- Recommended Changes to the EFP
  - Vessel Performance Standards
  - EM function test and recording of entire offload
  - Shark and Jellyfish Discards
  - Recording discards from net cleaning
  - Classification of cameras as “critical” vs. “non-critical”
  - Requiring vessels to send logbook pages to video reviewer – discussion only

Communications

- Clear and timely communication to and from directly affected participants – both processors and harvesters – is critical. The right people need to be involved (plant processing managers and crews; vessel operators and vessel owners) from the very beginning and throughout the course of the year. Specifically, written communications are vital, including emails and documents that are easy to utilize as reference guides.

- Strong communication directly to vessel participants by the EM video reviewer (vessel feedback loop) and EM provider (technical and service issues) are essential to address issues in near real time and to provide ongoing education on the EM systems and EFP requirements.

- ***EFP experience to-date indicates that the communication loops are working well.***

EFP Team Meetings

- Weekly/biweekly EFP team meetings (Agency, Observer Program, EM providers, shoreside observer provider, EM video reviewers, and PIs) are critical.
- These meetings provide the ability to understand on the ground issues (in near real-time) under the EFP so that they can be addressed/resolved as quickly and efficiently as possible.
- This helps to ensure successful execution of the EFP.

EM EFP Team

EFP Participants

- Catcher Vessels
- Tenders
- Processors

EM Provider and Data Reviewer

- Saltwater, Inc., Archipelago Marine Research & Pacific States Marine Fisheries Commission

Shoreside Observer Provider

- Saltwater, Inc.

EFP Permit Holders

- Ruth Christiansen (UCB/BS) & Julie Bonney (AGDB/GOA); Charlotte Levy (AEB/WGOA)

Agency Partners

- NMFS AKRO, Observer Program, AFSC, NPFMC, OLE

PIs Educational Sessions

- Educational sessions held for vessel and processor participants to explain the goals, objectives, and requirements of the EFP and to answer any participant questions.
- Pre-season session held prior to start of EFP (prior to each season for WGOA).
- Written survey developed by PIs provided to participants to solicit feedback on experience under the EFP and to make recommendations for potential modifications to EFP.
- Participants feel strongly that it is best to keep any EM program as simple as possible and to avoid unnecessary complications (e.g., just because cameras may provide the ability to collect new data, why is it necessary to do so?).
- Mid-year debriefing session (April 24th) included synopsis of team meeting discussions and summary of survey results, which separately identified processor and vessel issues.

Data Inputs:
Continued Need to Track and Improve Data Inputs

- Vessels – Logbooks: Continue to educate operators on needed data to include and where to record information in the logbook (e.g., check exempted in identification box and include permit number; personal use fish; number, species code, estimated weight, and pre-caudal length for shark discards).

- Processors – Fish Tickets: Continue to educate processing personnel on need for timeliness of fish ticket data (within 48 hours of offload); recording of "TEM" modifier on fish ticket; and total delivery weight must reflect everything that was delivered to the plant (i.e. items that won't go through the pumps).

Shoreside Observers:
Need to Improve Execution of Shoreside Observer Component

- Efficiencies: Based on experience to date, there should be no distinction between different types of shoreside observers (EM, AFA, AIS) in order to ensure maximum cooperation for the collection of required data. This point has been emphasized during the BS B season and GOA C/D Seasons as at-sea observers were no longer allowed to follow fish from the vessel into the plant due to Covid restrictions.

- Communication between processing staff and observers: Shoreside observers need to understand which vessel deliveries are EM and non-EM and the approximate offload weigh for EM deliveries in order to meet observer sampling protocols; processing personnel need to better coordinate with the observers to give them the tools/information they need as well as a safe and effective sampling station.

EFP Execution

- To-date, EFP execution (EM for compliance monitoring with shoreside component) appears to work better in the AFA BS pollock fishery than in the GOA pollock fishery.

- AFA vessels that have opted into the EFP are always fishing as EM vessels in the BS. AFA is a Catch Share Program which removes the race-for-fish and creates a generally stable offload schedule. It requires a Catch Monitoring and Control Plan (CMCP) for both pollock and Chinook PSC that includes regulations for processing plants and requirements for shoreside observers. This allows for timely and accurate reporting and having this already in place resulted in fewer challenges for the shoreside observers and processing plants.

- GOA pollock fisheries operate as a race-for-fish with unpredictable delivery schedules. GOA EFP vessels have the ability to opt in or out of EM via ODDS. Shoreside observers have not been deployed in processing plants for many years and no CMCP is required. For processing plants who buy both AFA and GOA pollock it is difficult for plant personnel and observers to track which deliveries were EM.

- ***EM functions better in a rationalized fishery since the industry has a well-defined fishing/processing schedule. Shoreside observer issues persist and improvements are needed in the GOA.***

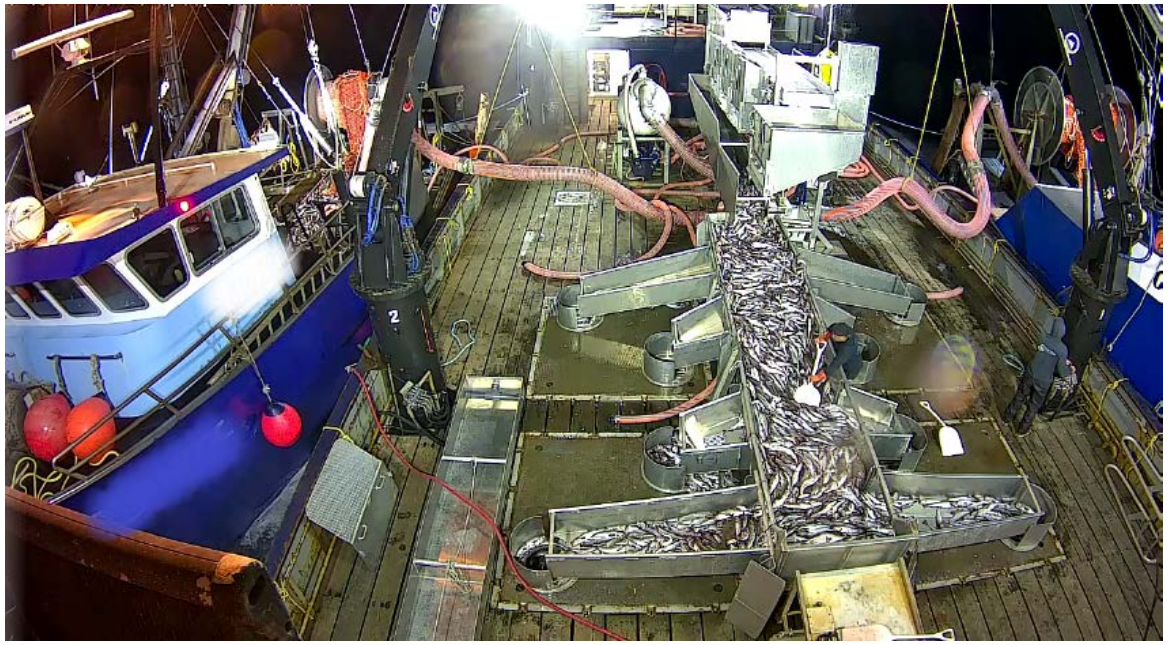
EFP Execution – Processor Challenges

- Main challenge cited in BS was keeping track of which vessels were in the EFP and which ones were not
- Challenges cited in the GOA primarily associated with nature of the race-for-fish and include:
  - Quickly changing plans that impact ability to provide estimated offload size and time offload to shoreside observer
  - Quickly changing plans that require a vessel to be sent to another facility for offload
  - Offload times associated with deckloads and later returning to remainder of offload
  - Stopping/restarting offloads

Tenders and Mobile Systems in WGOA

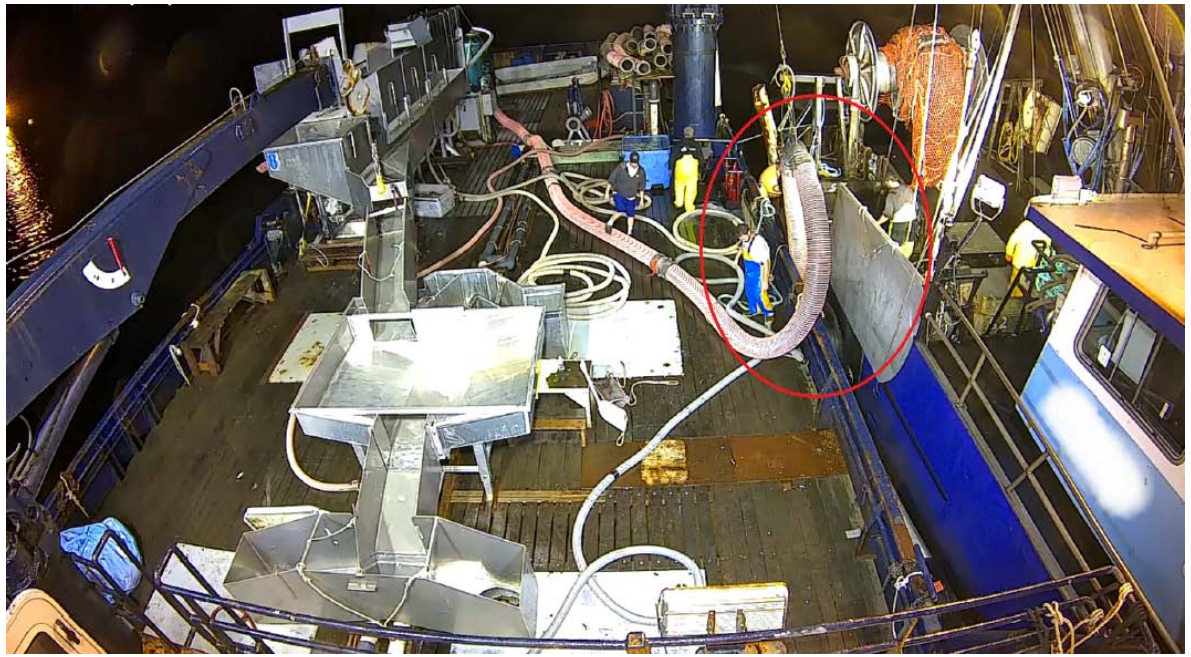
- Collaboration with NMFS/observer program was critical. Developed tender ticket log; screenshare session to review tender EM data.
- Mobile systems provided necessary flexibility
  - Concern: how can processors adhere to the EFP Tender Protocols, without sacrificing necessary flexibility with tender fleet.
  - Solution: mobile systems were deployed less than a week before C season opener, able to get them installed/deployed/skippers trained with approved VMPs. Systems function well with adequate views. Strong positive feedback from processors.
- Most challenges were anticipated
  - Minor adjustments to camera views; differentiating deliveries on tenders that receive back-to-back deliveries on both sides of the tender; ensuring processors are clear on tender rules; monitor located in pelican case instead of wheelhouse for skipper to easily view; no good method for anticipating tender trips beyond CV logged trips in ODDS.
- Unanticipated challenges are unique to 2020 and have been addressed. Issues were mostly related to last minute changes in processor operations/locations.

Mobile System Views



Delivery on one side;
cleared pump between deliveries

Deliveries on both sides;
needs to clear pump between deliveries



Recommendations for 2021 EFP Changes
Issue #1 – Review and Simplify Performance Standards

- BS and GOA MRA incentives/issues are unique to each area.

- GOA pollock trip limits rules should be reviewed.

- PIs designed the performance standards which can be revised as appropriate without requiring modifications to the EFP. PIs will present potential revisions to the Agency, EFP team, and vessel participants over the coming months.

Recommendations for 2021 EFP Changes

Issue #2 – EM Function Test

Issue: Vessel operators are currently required to perform an EM function test before leaving the dock. The goal of the function test is to document that the camera system is working before the vessel departs. There are situations in which a vessel may change their fishing plan at sea (e.g., switching between state waters pollock to federal pollock; tendering then immediately redeploying to BS pollock) or where vessels are busy preparing to leave for their next trip, both of which make it difficult/impossible to comply with this requirement.

Recommendation: Allow EM function test after departing from the dock – either within a specified port box or 2 hours before deploying the net (preferred).

Recommendations for 2021 EFP Changes

Issue #3 – Shark Discards

Issue: Currently, vessels are only allowed to discard sharks that are greater than six feet, which appears to be an arbitrary length requirement. It is difficult for the EM reviewer to determine the length of each shark to monitor compliance. Further, non-EM vessels are allowed to discard all sharks.

Recommendation: Require retention of all dogfish sharks and allow discard of all sleeper and salmon sharks.

Recommendations for 2021 EFP changes

Issue #4 – Jellyfish Discards

Issue: Jellyfish can be discarded according to the permit; however, vessel operators are required to quantify and record the amount of jellyfish discarded. Quantifying jellyfish that is discarded is nearly impossible. This information is not collected in non-EM pollock fisheries (there is no jellyfish stock assessment to inform).

Recommendation: Do not require jellyfish discards to be recorded by the vessel.

Recommendations for 2021 EFP Changes

Issue #5 – Recording of Entire Pollock Offload

Issue: Recording the entire pollock offload does not allow vessels to swap out hard drives nor for the service provider to make repairs to EM system at the dock. Vessels can be required to wait a day or so before offload and some offloads are 10 or more hours. Based on review to date (see PSMFC report for details), haul review time was less than half the review time required for offloads with virtually no discards occurring at the dock. Maintaining this review requirement will result in continued inefficiencies for participants and unnecessary (increased) costs for very little gain.

Recommendation: Do not require entire pollock offload to be recorded and reviewed.

Recommendations for 2021 EFP Changes

Issue #6 – Net Cleaning Discards

Issue: Under current practice, pollock discards that are a result of net picking/cleaning are not recorded by vessel operators or observers for non-EM vessels. Appropriate and accurate recording of net cleaning discards is difficult given that a vessel often won't pick the net until after an offload is complete and their logbook data has already been turned into the processor and submitted to the EM video reviewer. Amounts of pollock from net picking is difficult to estimate for both the operator and the video reviewer.

Recommendation: Do not require pollock discards resulting from net cleaning to be recorded by the vessel operator or the video reviewer.

Recommendations for 2021 EFP Changes
Issue #7 – Classification of Cameras as "critical" vs. "non-critical"

Issue: Currently, the stern ramp camera is classified as critical (along with the main deck and horizon view cameras). Maintaining this classification impacts flexibility for vessel operators to conduct one trip before scheduling a fix. Deck and horizon view cameras see and record all vessel discards.

Recommendation: Re-classify the stern ramp camera as non-critical.

Item of Discussion for Potential EFP Change

Issue #8 – Requiring Vessels to Send Logbook Pages to Video Reviewer

Issue: Vessels encounter difficulties in sending logbook pages within the required timeframe from remote ports due to limited internet and cell phone coverage as well as from Covid restrictions at plants (vessel personnel are no longer allowed in the processing plants). Currently processors record all logbook discard data in e-Landings, which is used for catch accounting purposes.

No Recommendation at This Time: Would like to discuss whether it is necessary to continue requiring vessels to send copies of their logbook pages to the video reviewer.

Summary: Lessons Learned/Recommendations for EFP Modifications

- EFP experience to-date indicates that the designed communication loops are working well.
- Need to continue to track and improve data inputs.
- Shoreside observer issues persist and improvements are needed, especially in the GOA.
- EM functions better in a rationalized fishery since there are well-defined fishing and offloading schedules.
- Vessel Performance Standards to be reviewed and modified.
- Allow EM function test after departure.
- Remove requirement that any discarded jellyfish be logged by the vessel.
- Allow shark discards for Sleeper and salmon sharks less than six feet.
- Do not require entire pollock offload to be recorded.
- Remove requirement that discards from net cleaning be logged.
- Re-classify the stern ramp camera as non-critical.
- Do vessels need to send copies of their logbook pages to the video reviewer?

Questions?