Alaska Longline
FISHERMEN'S ASSOCIATION
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September 26, 2016

Dear council members,

On behalf of the Alaska Longline Fishermen's Association (ALFA), I would like to offer the following comments on **Agenda Item C-3, the Electronic Monitoring Integration Analysis.**

ALFA members appreciate the stakeholder engagement that has gone into developing Electronic Monitoring (EM) in this analysis. The document is very informative and sufficient for ALFA to recommend the Council identify Alternative 2 as a preliminary preferred alternative (PPA) at this time. The identification of a PPA is necessary to focus discussions on enforcement considerations, to guide future field work, and to initiate cost and data quality optimization work required prior to implementation. In addition, ALFA recommends the Council initiate a trailing amendment to require full retention of rockfish species by all hook and line vessels regardless of their status as observed, unobserved or EM monitored. Additional detail on each of these recommendations is provided below.

Selection of Alternative 2 as a PPA
In making the recommendation for Alternative 2 as a PPA, ALFA notes that Council direction and stakeholder input have shaped the development of EM for the fixed gear fleet with a focus on integration with key elements governing the partial coverage portion of the restructured Observer Program. These key elements include less than 100% coverage, funding through fees, and a voluntary "opt-in" approach rather a mandatory requirement to carry EM. Alternative 2 parallels the current Observer Program approach of directly estimating discards using at-sea observations (EM video footage) collected from a randomly selected sub-set of vessels in a defined stratum. Alternative 2 minimizes the financial burden of funding at-sea monitoring by using a standard fee collected from all fixed gear vessels, whether selected for at-sea monitoring or not, to equally distribute the costs of data collection by observers or EM. This allows for optimization of each tool within the overall at-sea monitoring program based on cost, data quality, and vessel compatibility. Because EM is voluntary, requirements for EM boats must be proportional to observed boats in order to generate the stakeholder buy-in needed for success. Alternative 2 supports this proportionality and may result in fewer burdens on the vessel operator than Alternative 3. In recommending Alternative 2 as the PPA, ALFA further notes that:

- Alternative 3 (logbooks) requires all elements and costs of Alternative 2, plus addition costs and the potential enforcement burden of logbooks. The EM hardware, field services, and most of the EM data review protocols necessary to validate logbook information are essentially the same as those used to directly estimate catch and discards.

- A logbook program for fixed gear vessels would only provide data on a limited number of species due to the practical limits of a vessel operator's ability to accurately track discards across multiple species. All other species would need to be estimated as described in Alternative 2. Thus, the only benefit of Alternative 3 would be to enhance reporting of a limited number of species with potentially improved data turn-around times. **Field work in Alaska has shown that EM data turn-around times using direct**

catch estimation are sufficient to meet management needs. Under Alternative 2, data turn-around times can be further improved as needed by methods such as hard drive submission after each trip, local data review, or prioritizing Alaska data review during critical times. These improvements in data turn-around times under Alternative 2 would apply to all species and could likely be secured at a lower cost than instituting a logbook program.

- Most logbook audit programs are implemented to reduce EM data review costs in 100% coverage programs by reviewing only 10% to 20% of the data collected to validate logbooks. Alternatives 2 is optimized for the Alaska fixed gear program's partial coverage environment where the need to manage large volumes of EM data can be governed by the selection rate directly. Instead of collecting EM data on 100% of trips and using only 10-20% of the data collected to validate logbooks while having to pay to process and store all data, Alternative 2 is designed around only collecting EM data on randomly selected trips and reviewing 100% of EM data collected. This reduces data storage costs, reduces the complexity of the program by simplifying effort reporting requirements, and reduces the burden on the fleet of maintaining EM systems on 100% of trips when most of the data collected is not used.

- Alaska's fee based program is not structurally suited to support incentives normally associated with a logbook program. Logbook audit programs in Canada and the US West/East Coast groundfish fisheries use internal incentives/feedback loops such as the cost of EM data review to incentivize logbook accuracy. In Alaska's fee based approach, direct individual incentives are precluded. The analysis notes that Alternative 3 would rely on NMFS OLE to incentivize accuracy. This approach is more costly and burdensome, and has not been demonstrated as feasible in other operational logbook programs, especially voluntary programs.

- Development of Alternative 3 would require more time and field work prior to implementation than Alternative 2. For the past two years, the Council's cooperative research program has correctly focused on developing base line data to document data quality, species identification capabilities, data review protocols, system reliability, vessel compatibility, and the field service cost models required to support the catch estimation component of either Alternative 2 or 3. The additional work to develop and validate the logbook component of Alternative 3 would delay implementation with little benefit given Alaska's partial coverage environment.

Additional considerations to be resolved prior to implementation.

- **Enforcement considerations**—The analysis notes that the EM program's main focus is a catch accounting and fishery management program that needs some compliance aspects to ensure data quality. ALFA agrees with this characterization and appreciates the constructive roll OLE is playing to identify the necessary enforcement considerations to support this focus. The analysis notes that additional work is needed to resolve enforcement considerations such as equipment breakdown at sea prior to EM integration. ALFA members also highlight the need to establish clear and transparent guidelines on activities that would trigger higher levels of video review by OLE for routine operator performance elements. For example, in most logbook programs a +- 10% error is allowed between logbook data and EM video review. In the IFQ fisheries, a vessel operator is allowed to up a 10% overage on his/her final trip. Similar guidelines need to be developed for EM vessels regarding release of halibut, discard of full retention species, and other catch handling activities where a 100% performance standard is not achievable. Finally ALFA members strongly support allowing vessels with EM systems to fish IFQ in multiple areas. This is an example where having an EM system could be of additional benefit

to the vessel's operation. We note the enforcement considerations in the analysis related to this provision indicate initial support by OLE, but highlight that further work is needed. Resolving these identified enforcement considerations as soon as possible is critical for program buy-in and success. We request the Council continue to task staff as needed to work on these issues.

- **Cost optimization**—Page 215 of the analysis notes that "*the existing pre-implementation program, which provided the baseline for some of the cost profiles, was not designed in a cost minimizing fashion. It is entirely possible that an EM program could be deployed within a given budget constraint, but doing so –at least in the near term- would likely require some cost-conscious design choices".* The analysis further notes that the "*size, scope and nature*" of the EM program, post-implementation, is still to be determined and will be annually described in the ADP. ALFA members are committed to developing EM in order to improve data quality and to reduce the costs and impact of at-sea monitoring. The data gathered during pre-implementation provides a wealth of information on the costs of specific tasks, and the analysis identifies cost factors and trajectories that can be used in designing an optimized EM program. However, what is still critically needed is a model to estimate the precision of catch estimates that result from various observer/EM deployment scenarios. ALFA wishes to highlight the need for this tool, and request the Council provide direction to stakeholders and Agency staff to focus on developing cost effective post-implementation EM/observer deployment options to guide Council decision-making. We note that observer fees will not likely be used to support EM integration until 2019. We recommend the Council task NMFS staff, the OAC, and the EM Workgroup to work backwards from this timeline to identify a work plan that will lead to tangible, cost and data quality effective options, for Council consideration prior to 2019.

Rockfish full retention.

The EM data review by PSMFC during the 2014 and 2015 EM cooperative research work has shown that, in most cases, it is possible to identify the rockfish harvested by the fixed gear fleet to the species or species complex levels required for management. There are a few groupings, such as shortraker/ blackspotted/rougheye rockfish, or longspine/shortspine thornyhead rockfish where observer rates would need to be used in an EM program is not limited to rockfish species and will be an intrinsic part of any EM program. Therefore, ALFA does not support requiring rockfish full retention by EM boats as part of the Councils PPA on EM. **Instead, ALFA strongly supports a trailing amendment requiring rockfish full retention for ALL fixed gear vessels (as described on EA p. 40)**. We note that full retention of Demersal Shelf Rockfish (DSR) is currently required of all IFQ sablefish and halibut Quota Share holders. Requiring full retention of ALL rockfish species would expand the current requirement to include (predominantly) rougheye, shortraker, thornyhead and a few minor "other rockfish" species such as silvergrey and red banded. Data from the EM video review by Pacific States Marine Fisheries Commission (PSMFC) can provide quantifiable information on the number of additional rockfish species involved and the likely number of times that full retention would exceeded the current MRA's. The purpose of the trailing amendment would be to reduce waste, provide consistent regulations for all rockfish species and management areas, reduce operator uncertainty when trying to comply with MRA regulations, and provide an opportunity for heightened shore-based catch accounting measures in the future if rockfish species become binding. As with the DSR requirement, ALFA recommends rockfish landed in excess of the MRA be forfeit with no monetary benefit to the vessel owner/operator or crew.

Thank you for consideration of these comments.

Sincerely, Dan Falvey

SEAGO SouthEast Alaska Guides Organization

Dan Hull, Chairman
North Pacific Fishery Management Council
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September 27, 2016

Re: C3 Electronic Monitoring Integration

Chairman Hull,

The Council's responsibility for conservation and management of groundfish fisheries requires management decisions supported by high quality, timely, and cost effective data, which is provided in part by the Observer Program. SEAGO supports the Electronic Monitoring (EM) Workgroup's proposal to integrate EM systems into the Observer Program. Human observer programs assist in obtaining data by conducting research and collecting biological samples, weight data, sex data, and details of marine mammal and sea bird interactions. However, there is a recognized benefit of implementing EM tools, especially on any vessels under 57.5 feet, where carrying a human observer is difficult or impractical.

Use of EM systems can help the Council better meet its management responsibilities over time. As with human observers, EM can be used to identify a high proportion of retained and discarded catch to species level. EM may provide a broader cross-section of information by covering more and smaller vessels. It also frees human observers to cover vessels over 57.5 feet which have a higher potential for interactions with prohibited species. In the long term, the Council has the opportunity to reduce Observer Program economic, operational, and social costs. As the systems are put in place, and ease of use is achieved, operational and other costs will presumably decrease as benefits of EM increase.

Program benefits will increase if the Council prioritizes enforceability in its final rules. This can be done by ensuring regulatory consistency, clear regulations regarding vessel owner and operator responsibilities, and a clear list of required EM system functions. In addition, management plans should allow for NOAA Enforcement visits, require reporting of violations, and require data retention of 3-5 years.

Sincerely,

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