

The AP acknowledges the receipt of the 2025 Observer Program Annual Report and appreciates the work that went into it. The AP supports the following recommendations from NMFS and/or the FMAC:

1. Deployment Design: Continue using proximity allocation method and the same strata that have been used in the Annual Deployment Plan (ADP) since 2024 for the 2027 ADP. Implement any suggested changes to the 2027 ADP after the Center for Independent Experts (CIE) Review is complete.
2. Improve Closing of ODDS Trips for 2027:
  - a. Automated reminders to close or cancel pending trips that have surpassed planned fishing dates.
  - b. Consider requiring a landing report ID, trips to be closed in the order they were logged, and/or other information to close fixed gear strata trips to improve record keeping.
3. EM Video Review:
  - a. Continue collaboration with PSMFC to monitor video review progress and enable a review strategy that will result in EM video review times that result in the most useful information for the most number of trips for a given cost.
  - b. Continue collaboration with PSMFC to develop specific prioritization rules that can be used to allocate review effort to the fisheries, gear types, times and areas that are the most dependent on EM data for management needs.
4. EM Selection Pool Criteria:
  - a. Maintain an EM selection pool composed of up to 181 fixed gear vessels, which would maintain the size of the EM pool from 2026.
  - b. Prioritize placement in the EM selection pool based on vessel size, fishing effort, minimizing data gaps, and cost efficiency.
  - c. For vessel operators with repeated problems causing data loss, NMFS may disapprove Vessel Monitoring Plans and the vessel may be removed from the EM pool.
  - d. Continue to review the cost effectiveness of individual EM vessels and remove vessels from the fixed-gear EM pool or deny vessels from the trawl EM category. Criteria for continued inclusion in these EM programs will be specified in the 2027 ADP.
5. EM Development:
  - a. Continue to collaborate with industry partners on EM development and cost efficiency projects.
  - b. Work with FMAC and PCFMAC to develop priorities and potential grant proposals to the National Fish and Wildlife Foundation.
  - c. Include a reminder in the draft 2027 ADP for processing plants in the GOA to comply with regulations at 50 CFR 679.51(b)(3)(i) to provide notice by Nov 1 of the year

prior that they intend to take TEM deliveries in the following year so that the partial coverage budget can be accurately determined.

- d. The AP specifically supports continued development of the freezer longliner's pilot EM project and continued support for the recent progress made on the pot cod catch handling EM project.

6. Additional FMAC Recommendations:

- a. Continues to support modifying the zero-selection pool in the draft 2027 ADP for increased cost efficiencies.
- b. In the enforcement section of the 2027 Annual Report, the agency should include whether the vessel or processor was able to resolve the issue in response to the statement during the season.
- c. In the 2027 Annual Report, provide additional clarity on overall full coverage costs.
- d. To resolve discrepancies between vessel and EM review pollock discard estimates in Trawl EM, improve communication pathways among AFA, NMFS, and PSMFC to clarify what vessel operators are required to report; ensure vessel logbook explanations are available to EM reviewers to provide additional context for discard events; develop a formalized secondary blind review process for discard estimates that may advance toward enforcement actions.
- e. In regards to NOAA's planned transition to login.gov multi-factor authentication for all public-facing systems including ODDS, the committee recommended the Council send a letter to the Department of Commerce highlighting the challenges and requesting reconsideration or accommodations for Alaska fisheries participants.

*Motion passed 16-0*

**Rationale in Support of Motion**

- *The AP supported all NMFS and FMAC recommendations with similar rationale as noted by the Agency and in the FMAC report. Only additional, or particularly emphasized, rationale is provided below.*
- *The AP indicated that additional tools for closing and/or matching eLandings to ODDS trips for 2027 would be helpful not only to address agency concerns, but also fleet challenges. Particularly in fisheries with a high volume of trips like pollock trawl, it can also be confusing for vessels to ensure they are logging an adequate number of trips in ODDS; adding a requirement for the landing ID in ODDS would help them keep track as well as providing benefits to the Agency.*
- *The AP expressed hope that PSMFC can get to a place where all EM trips (fixed-gear and trawl) are reviewed every year, rather than relying on the review prioritization, but did support development of a review prioritization for trawl.*
- *The AP noted the extremely high cost per Fixed Gear EM trip in 2025. The total Fixed Gear EM cost in 2025 was \$1,500,643 (Table 3-1) and there were a total of 123 selected and reviewed fixed gear trips (Page 6), which breaks down to a cost of \$12,200 per reviewed trip of EM data. The AP supports improvements to the EM selection pool and the removal of vessels either with*

*consistent issues or who have not fished for decades, so partial coverage funds can instead be used on vessels that will participate.*

- *While specific projects were not included in the Agency or FMAC's recommendations for continued development, the AP did note support for the freezer longline EM pilot to continue and for next steps to be determined for the pot cod catch handling project. The AP mentioned that it takes a lot of industry capacity to find funding and complete these projects and appreciated that the Agency is able to financially support the freezer longline support but hoped that money could also be provided to determine whether the pot cod catch handling project needs a larger pilot or can be incorporated into the current program. The AP noted there have been consistent concerns with pot cod data quality as well as operational challenges for vessels under status quo catch handling that makes it prohibitive to participate in EM so there is justification for moving forward.*
- *The AP also discussed, in reference to public comment and the Observer Program's response to SSC concerns on data gaps from transitioning to EM data, that the AP reiterating support for continued development of these projects does not indicate that the AP feels these are ready for full implementation. But rather that the collaboration between Agency and industry in pilot projects and Exempted Fishing Permits has proven to be an effective method for continuing to develop EM programs and flush out issues and challenges that arise.*
- *The AP noted a breakout of cost related to on-the-water observers compared to shoreside observers in the EM program is needed to clearly understand costs for full coverage fleets*
- *The staff presentation noted the monitoring-related Deregulatory Actions under EO 14276 using 305(d) authority, including modifying the language in the new Trawl EM regulations regarding transiting and timing of requirements to turn on EM systems, which was overlooked during implementation. The AP also heard public testimony from a GOA pollock participant who fishes Pacific cod in the Bering Sea and Western GOA. The updated language needs to be inclusive of situations where a vessel may finish another fishery where EM is not allowed by delivering to a tender vessel rather than returning to a port, before moving into a pollock EM trip. There needs to be an allowable timeframe for turning on the EM system in these situations.*
- *The AP also continued to stress the potential ramifications of a requirement for fishermen to move to Login.gov for ODDS and other agency platforms and reiterated the FMAC's support for the Council to write a letter to the Department of Commerce.*