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September 27, 2019

Mr. Simon Kineen, Chair  
North Pacific Fishery Management Council  
605 W. 4th Avenue, Suite 306  
Anchorage, AK 99501-2252

Dr. James Balsiger, Regional Administrator  
NOAA Fisheries, Alaska Region  
709 West Ninth Street  
Juneau, AK 99802-1668

RE: Agenda Item D1 Trawl Electronic Monitoring Exempted Fisheries Permit Review

Dear Chairman Kineen, Dr. Balsiger and Council Members:

Thank you for taking comments on the review of an exempted fisheries permit (EFP) for “Implementing Electronic Monitoring (EM) Systems in the Eastern Bering Sea and Gulf of Alaska Pollock Pelagic Trawl Catcher Vessel Fisheries.”<sup>1</sup> It is valuable to conduct research to determine whether new technology can improve monitoring and management of Alaska’s fisheries. While we support innovation in a changing environment as it is useful for obtaining more fisheries data for management and fisheries science, we believe a cautious approach should be taken with incorporating new technologies to ensure there is no loss of data collection capabilities, no decrease in confidence in catch and bycatch accounting, and continued ability for timely in-season management.

The EFP should be approved under the condition of video recording for 100% of the trawl EFP trips with linked location data.<sup>2</sup> This is important for compliance monitoring as well as mitigating the “observer effect.” The observer effect, when fishing behavior differs between observed and unobserved trips, biases fisheries data; with video recording 100% of the time, it eliminates the possibility for behavioral differences. Oceana shares concerns identified by the Alaska Fisheries Science Center<sup>3</sup> about the lack of detail in the application for how 100% review of EM video will be accomplished and how reviewers will be trained. 100% video recording during fishing trips is important for this program to be successful as a compliance monitoring tool. Lessons can be taken from hook-and-line EM video review<sup>4</sup> to advise for a timely, in-season, and complete review.

Oceana strongly supports 100% observer coverage for the Gulf of Alaska trawl fleet. If that cannot be achieved, then EM is better than no coverage. The gained data for the Gulf of Alaska (GOA) pollock pelagic trawl fleet can aid better management for the GOA trawl partial coverage stratum. However, EM has its limits and we caution against the tradeoff of implementing EM on Bering Sea trawl catcher vessels that otherwise already carry observers for catch accounting and compliance monitoring as required by regulation. One of the exemptions requested in this EFP is: “*Regulations at § 679.51(a)(2) require a catcher vessel directed fishing for pollock in the BS to carry an observer at all times.*”<sup>5</sup> Where

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<sup>1</sup> [Trawl EFP Application and NMFS Review, September 2019](#)

<sup>2</sup> [Trawl EFP Application and NMFS Review, September 2019](#)

<sup>3</sup> Memo from Science and Research Director Robert Foy: [Trawl EFP Application and NMFS Review, September 2019](#)

<sup>4</sup> Table 3-6, North Pacific Observer Program 2018 Annual Report

<sup>5</sup> [Trawl EFP Application and NMFS Review, September 2019](#)

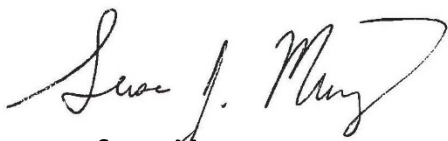
observers are already collecting valuable data, and on vessels with the more cost efficient 100% coverage daily rates,<sup>6</sup> careful consideration should be made regarding the trade-off between compliance monitoring alone with EM and all the services human observers provide.

EM and shoreside observers cannot replicate the valuable role that at-sea observers play in gathering scientific data. The second of four EFP objectives aims to: *“Demonstrate that at-sea observers can be replaced with observers at shoreside processing plants such that data needs and data streams for effective fisheries management are maintained.”*<sup>7</sup> However, biological data collected by human observers on fishing vessels is important for fisheries scientists and cannot be collected via EM. These samples include otoliths for aging fish, sex-length frequencies, stomach samples for diet composition, salmon scales for aging, genetic samples, seabird and marine mammal interactions, and marine mammal samples in mortality events. Observers are also able to give spatial resolution to haul-specific catch composition and biological data; this spatial resolution is lost when sampling is solely undertaken by a shoreside observer. Continued work and discussion revolving around data needs by fisheries scientists is important to implement a new monitoring tool that does not hinder the scientific needs of well managed fisheries.

Past Council meetings have seen concerns with tender offloads raised, particularly with Chinook salmon prohibited species catch (PSC) reporting.<sup>8</sup> In the GOA, concerns about extrapolated samples versus census counts when deliveries are made to tender vessels remain unaddressed. A shoreside observer collecting whole haul counts is important, as well as corroborating video recording for 100% of the EFP trawl trips to ensure no salmon were discarded at sea. The EFP should also explicitly ensure that any PSC bycatch caught during the EFP will count toward the fisheries’ PSC limits.

The North Pacific Observer Program is responsible for providing accurate and reliable data to fisheries scientists, managers, fishermen, and other stakeholders.<sup>9</sup> EFPs can be useful tools to support research but should be used thoughtfully and cautiously without sacrificing monitoring needs and conservation measures. We support continued innovation that provides statistically reliable data and maintains public trust in Alaska’s fisheries.

Sincerely,



Susan Murray  
Deputy Vice President, US Pacific  
Oceana

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<sup>6</sup> [Alaska Fisheries Science Center and Alaska Regional Office. 2019. North Pacific Observer Program 2018 Annual Report. AFSC Processed Rep. 2019-04, 148 p. AFSC, NOAA, NMFS, 7600 Sand Point Way NE, Seattle WA 98115.](#)

<sup>7</sup> Facilitating Council Objectives for EM, p 21: [Trawl EFP Application and NMFS Review, September 2019](#)

<sup>8</sup> [Observer Coverage Tender Issues, December 2018](#)

<sup>9</sup> <https://alaskafisheries.noaa.gov/sites/default/files/observer-prog-summary.pdf>