

ENFORCEMENT CONSULTANTS REPORT ON CONSIDERATION OF INSEASON ADJUSTMENTS

The Enforcement Consultants (EC) understand the primary use of video monitoring of whiting boats was initially intended to be used as a scientific tool, not an enforcement tool. As such, the program was not designed to make video recorded data immediately available to enforcement when needed to investigate possible discard issue. In the absence of a compliance monitor onboard the vessel, the EC feels that these cameras can be an essential part of the enforcement effort. If the intent is to utilize camera data for enforcement purposes, the information becomes evidence. Rules of evidence then apply in order to successfully prosecute violations and must be considered. Enforcement needs the ability to access the information throughout the season without having to remove a hard drive from the camera thus leaving the camera disabled until the hard drive is replaced. It is important to design a system that allows enforcement the opportunity to conduct their own review and analysis in real time, conduct spot checks, and minimize down time for the vessel operator.

The EC recommendations are contained within the attached discussion points that were associated with the EC PowerPoint presentation.

EC Recommendations - Vessels

- *Need for a strong regulation packet.*
- Install adequate number of cameras including a high resolution “ramp” camera.
- Secure camera against tampering (unplug, etc...).
- Only allow daytime fishing and haul back.
- No onboard camera monitors.
- Provide ability to download daily information for patrol officer review at time of boarding.
- Better define “operational discard.”
- Major penalties for monitoring violations.
- Require video monitoring and maximum retention - catcher vessels.
- Require mandatory logbook - catcher processors.

Recommendations Shoreside - Plants

- 100% third party compliance monitoring of all offloads.
- Direct Enforcement access to monitors and data.

PowerPoint Presentation Attached

PFMC
09/12/07



West Coast Enforcement



A WEST COAST OPERATION



SHORESIDE WHITING FISHERY ENFORCEMENT

One Fish, Two Fish Red Fish, Blue Fish

- Objectives:
 - Total catch accounting
 - Educate enforcers & commercial industry
 - Provide information to PFMC
- Involved all original receivers of Whiting in CA, OR & WA
- June 25 – June 29 / 24 hour monitoring



What have we learned by this?

By-catch Sorting Issues

- Some plant conveyers were not long enough to handle volume
 - To few employees to effectively sort
- Unmonitored sorting at secondary receiver
- Fish ticket variations – accuracy?
- Proper species identification



Case Investigation

- 3 tons Widow rockfish wash up on Long Beach, WA
- Investigation ties fish to illegal discard
- Camera disabled – hard drive seized
- 16,000 pounds estimated dumped
- Motive was to avoid approaching Widow Rockfish cap



Preliminary Camera Review

- 32 hard drives gathered for analysis
- To date, 22 % have been evaluated
- Of those 22%, 40% show camera outages
- Duration of outages up to 3 hours
- Outages occurred during haul backs

Monitoring System Failings

- Video Monitoring
 - Placement and number of cameras
 - Easily compromised
 - Unplugged
 - haul back low/no light
 - up to a week to fix
 - Crew able to monitor camera image
 - Aware of blind spots
 - In-season review challenging
 - Requires removal of hard drive and timely review
 - Post season challenges
 - Analysis reports not timely for LE efforts.
 - Fish difficult to identify

System Failings Con't:

- Exceptions to maximum retention
 - Operational discard (undefined in rule)
- Catcher vessel/mother ship sector
 - Catcher vessel currently not required to fish under maximum retention
 - No monitoring requirement
- Catcher Processor sector
 - Voluntary logbook instead of mandatory

Can Lead To...

- Overfishing as illegal discards not realized until after season
- Extreme challenges in enforcing maximum retention



EC Recommendations Vessels

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Recommendations Vessels Con't

- Provide ability to download daily information for patrol officer review at time of boarding
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- Major penalties for monitoring violations
- Require video monitoring and maximum retention - Catcher vessels
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Recommendations Shoreside Plants

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Thank You

PFMC
Enforcement Consultants

Last updated: 13 September 2007