

GROUND FISH ADVISORY SUBPANEL REPORT
ON THE ELECTRONIC MONITORING REGULATORY PROCESS

The Groundfish Advisory Subpanel (GAP) was briefed by Mr. Brett Wiedoff on the Electronic Monitoring (EM) regulatory process, draft analysis, and Groundfish Electronic Monitoring Policy Advisory Committee (GEMPAC) report. The GAP would like to thank Mr. Wiedoff and Mr. Seger for their work on the analytical document, as well as the GEMPAC for its report.

Overall, the GAP would like to see regulations for EM move forward as expeditiously as possible. The rationale for moving forward quickly is described in detail in previous GAP statements and is encapsulated on page 15 of the Draft Analysis of an Electronic Monitoring Program for the Pacific Coast Limited Entry Trawl Groundfish Fishery Catch Shares Program (Agenda Item F.2.b, Attachment 1, June 2014). High costs, measured both in direct payments to observer providers as well as in lost opportunity when observers are not available, a heavier burden for small boats and more remote ports with less activity, and the indication that observer companies may pull out of “unprofitable” ports are some of the primary reasons for needing to implement an EM system. Additionally, many in the fleet feel that having an observer is intrusive, takes up critical space on vessels, and limits operational flexibility.

The GAP endorses the entire GEMPAC report, but does not offer any recommendations on specific preliminary preferred alternatives (PPA) at this time other than those contained in the report. The GAP hasn’t yet seen the necessary cost analysis and believes that more analysis is needed before selecting PPAs for many items. The GAP firmly believes the Council should take final action in September, and we expect the necessary analysis will be complete in time for us to take final action at that time.

The GAP offers the following specific comments on the documents.

First, the GAP agrees with the GEMPAC recommendation to strike the “Spatial Variation for High Bycatch Areas” option from the draft analytical document. The GAP believes that it would add unnecessary complexity, and would likely constrain opportunities for use of EM when no such constraint is required in a program that holds each individual accountable.

Second, the GAP believes that while potential impacts to observer provider companies should be given consideration, primary consideration in the decision to move forward or refrain from moving forward with EM should be focused on the fleet. Furthermore, if observer providers are so tenuous that transition to EM for a portion of the fleet may seriously threaten their business models, then that illustrates that alternatives to human compliance monitors are indeed desperately needed. Finally, there was some discussion about whether the removal of human compliance monitors from vessels would disrupt the shoreside catch monitor component of the program. The GAP believes that there are a variety of alternatives that could serve this purpose if the removal of human compliance monitors did in fact require changes to the current structure of the shoreside catch monitor system.