

SCIENTIFIC AND STATISTICAL COMMITTEE REPORT ON TRAWL
RATIONALIZATION TRAILING ACTIONS

Mr. Jim Seger (PFMC) and Mr. Colby Brady (NWR) briefed the Scientific and Statistical Committee (SSC) regarding the “Initial Draft White Paper: Electronic Monitoring and Performance Standards”. The SSC also reviewed the “Final Report for the Electronic Monitoring Program: Review of the 2012 Season” prepared by the Pacific States Marine Fisheries Commission.

The white paper provides a synthesis of considerations regarding the use of performance standards versus more traditional types of regulations. This is a rather large and complex topic, and the authors of the white paper should be commended for their efforts to clearly summarize many of the relevant issues. In theory, regulating through performance standards may be relatively advantageous in terms of cost effectiveness. However, as the white paper points out, the verification of compliance with performance standards may be difficult or costly to implement. The SSC recommends that the next draft of the white paper, expected at the September 2013 Council meeting, focus more sharply on this issue.

The white paper indicates there is little information available regarding similar regulations in other fisheries, or analyses that compare the costs and outcomes associated with different regulatory approaches. Given the enormity and importance of these topics, the SSC recommends the authors make a concerted effort to discover any relevant information, if it exists. Without more information it is difficult to provide guidance on how these regulatory approaches may work in actual practice.

The cost of the human observer program is an important driver in the exploration of electronic monitoring. A comprehensive benefit-cost analysis of the alternatives, taking into account all significant factors, would be necessary to determine the net relative advantages of the various options. The total cost should be evaluated, including a delineation of costs borne by industry and costs borne by the public. This is necessary so the total societal cost and its distribution can be evaluated.

The Final Report for Electronic Monitoring does not address the primary question the SSC raised in our April 2013 statement, namely why are there differences between catch (both retained and discarded) measured by electronic monitoring and human observers. In addition, because no additional information was provided to the SSC for this Council meeting, it is unclear whether the electronic monitoring testing being conducted this summer will address the comments we provided previously regarding the efficacy of the system at the April 2012 Council meeting (Agenda Item I.4.c, Supplemental SSC Report, April 2012).