

WASHINGTON DEPARTMENT OF FISH AND WILDLIFE REPORT ON
TRAWL RATIONALIZATION TRAILING ACTIONS

At its April meeting, the Pacific Fishery Management Council discussed the potential for allowing vessels to use electronic monitoring systems (i.e., video cameras) as a means of fulfilling the mandatory observer coverage requirement of the Trawl Rationalization Program. At that meeting, the Washington Department of Fish and Wildlife (WDFW) proposed, and the Council unanimously accepted, creating an ad hoc workgroup comprised of agency staff to develop a white paper that would discuss ideas for performance standards for the Electronic Monitoring (EM) Program for the September meeting.

In reviewing the issue, we felt like the Council left some ambiguity in the term “performance standards” with it potentially referring to various features and goals of an EM Program. There was little discussion and guidance provided by the Council about what the white paper should address. WDFW suggests that the Council provide that guidance at this meeting.

As we expressed in April, the mandatory observer coverage requirement is key to achieving the Trawl Rationalization Program’s primary benefits of groundfish conservation and individual accountability. It is imperative that an EM Program be thoughtfully designed, carefully considered, and stringently applied so as to not compromise these objectives.

An EM Program can be structured and implemented with varying degrees of success. There are many factors to consider in designing and implementing an EM Program, including differences in gear types and vessel operations, and the strength of accompanying management measures, including disincentives and consequences for violations. Whether an EM Program can be successfully designed and prosecuted in a cost-effective manner, or in a way that results in cost savings to vessel operators, is an outstanding question.

In order to preserve the conservation and accountability aspects of the Program, the EM Program must accurately capture discard events (i.e., whether discard has occurred), amount of discard (i.e., volume in weight and size of individual fish), disposition of discard (i.e., if we are to consider providing survivability credit for released fish, such as halibut), and do so even for rare events (e.g., catch and discard of rebuilding rockfish, by species). The Council should develop and adopt performance standards to ensure these highest level monitoring goals are met.

In addition, when considering the design of an EM Program and discussing performance standards, the Council must consider the economic incentives to misreport or underreport catches and mortalities of overfished rockfish and Pacific halibut. Individual accountability in the fisheries will hold only so far as monitoring programs are able to counteract these incentives. As

such, having adequate enforcement to ensure compliance with the EM Program with strong consequences in place for violations are keys to success. We think it will be very important to provide the law enforcement perspective upfront during the design of the program.

Again, in an effort to begin the thought process and conversation about an EM Program with the Council, its advisory bodies, and the public, we offer the following items for consideration relative to potential management measures, camera requirements, and a video compliance monitoring process. We would recommend that the white paper on performance standards discuss the following issues:

Possible Elements/Conditions of Participating in an EM Program

1. Mandatory retention of all rockfish.
 - a. Maximum limit on tow time;
 - b. Intentional or unintentional “bleeding” of the net not allowed, not even minimal;
 - c. If a bleeding event does occur, magnitude of event should be estimated and quota deducted from the vessel’s account.
2. Other groundfish discard could be allowed if discarded in a controlled manner, e.g. a designated discard platform so that discarded fish pass under the view of a camera, so that species and weight can be determined.
3. Mandatory recording of discards in logbooks with estimated weights given for each species.
 - a. Disincentives for underreporting (e.g., 10% or more difference between logbook and video estimates, by species)
4. Disincentives for tampering with video equipment or turning camera off.
5. Provisions for camera failures or inoperability.

Camera Requirements

6. Number and placement of cameras must be capable of detecting potential discard events from any deck or surface of the vessel.
7. Camera resolution must be sufficient to accurately determine amount (volume in weight) of discard by individual species (i.e., size of individual fish and volume of groups of fish).
8. Camera and software must accurately capture activities occurring at night or times of low visibility (e.g., motion detecting).

Video Review Process

9. Mandatory (high percentage of trip time) review of video to compare logged discard events to video (at vessel account holder expense); vessel cannot commence another fishing trip until video has been reviewed and trip logbook is certified.
10. Logbook certification is achieved if video review determines that logbook amounts are within 10% accuracy of video review, by species (e.g., logbooks record 500 lbs and video estimates 550 lbs).
11. If logbook amounts do not meet 10% accuracy standard, then a 100% video review is triggered (at vessel account holder expense); vessel cannot commence another fishing trip until video has been reviewed and vessel account has been debited.
12. If the 100% video review is triggered more than twice within a six-month time period, then 100% video review is in effect for all fishing trips for the six months following the commencement of fishing activity.