GROUNDFISH ADVISORY SUBPANEL REPORT ON ELECTRONIC MONITORING COST ALLOCATION POLICY DIRECTIVE

The Groundfish Advisory Subpanel (GAP) reviewed the materials under this agenda item and offers the following comments and suggestions.

In general, the GAP believes it would be advantageous to have more than one meeting to review and have input on policy directives. As we await more information from NMFS on the Cost Recovery Program, we need more time to explore how cost recovery and Electronic Monitoring (EM) costs will intersect. Instead of rushing to get this directive in place, we also want to more clearly understand how future EM programs could be affected, and how payment of monitoring is apportioned based on legal requirements, such as those related to endangered species. The GAP is also concerned about language in the directive that discusses the potential to "end an existing program" if there are no longer sufficient appropriated funds to cover administrative costs. The GAP recommends a request for an extension to the comment period to allow comment at an additional meeting.

The GAP views electronic monitoring as linked with human observers as part of an overall vessel monitoring process. Therefore, a more holistic look at vessel monitoring would be more appropriate for a national policy directive. This would help facilitate the equitable application of policies across regions and across monitoring platforms (EM and human observers).

A GAP request for more time than just one Council meeting to review and comment on a policy directive also applies to the yet to be developed directive on EM video data storage. This is a subject that the GAP is very interested in since video storage costs seem to be a major hurdle in reducing EM costs to vessels in order to make EM financially viable to use.

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