GROUNDFISH MANAGEMENT TEAM REPORT ON VESSEL MOVEMENT MONITORING UPDATE

The Groundfish Management Team (GMT) reviewed the National Marine Fisheries Service (NMFS) report on the Vessel Movement Monitoring (VMM) rule (Agenda Item G.7.a, NMFS Report 1) and offers the following thoughts. We do not offer any recommendations but rather suggest analyses that may help inform Pacific Fishery Management Council (Council) decision-making at this meeting, or in June, per NMFS' recommendation.

Whiting Vessel Exemption

NMFS expressed concerns in their report about possible compliance issues due to the proposed increased ping rates co-occurring with the exemption for whiting vessels proposed under this action. The GMT believes this would impact a small number of vessels that would need to switch ping rates between trips.

The GMT believes that a vessel switching from bottom trawl to midwater whiting (or vice versa) between trips is highly unlikely. There could be instances where midwater vessels switch from whiting to non-whiting (or vice versa) between landings, but as shown in Table 1, this constitutes only a handful of vessels. Table 1 shows the number of vessels that participated in the shoreside whiting sector between 2016 and 2018 and, of those vessels, how many participated in the non-whiting trawl sector in the same year.

Additionally, the GMT understands that there is some administrative burden to NMFS and the Office of Law Enforcement associated with exempting whiting vessels from the increased ping rate.

If the Council chooses to reconsider the ping rate in June, the GMT recommends that NMFS provide cost estimates for the whiting fleet on increasing the rate from one to four per hour.

Table 1: Vessel target strategy participation, 2016-2018

Year	Vessels that Participated in Shoreside Whiting	Vessels that Participated in Both Whiting and Non-Whiting	
2016	23	6	
2017	25	8	
2018	26	14	

Electronic Monitoring

The GMT also discussed the concerns associated with having a different ping rate for vessels using electronic monitoring (EM). While the Enforcement Consultants can best speak to concerns about implementing these changes amongst the different quota compliance methods, the GMT found that vessels rarely switch between EM and an observer. Based on a preliminary analysis of PacFIN

data using the "Is_EM_Landing" field, Table 2 shows the number of vessels from 2016 to 2018 in the shorebased individual fishing quota (IFQ) fishery that used either observers or EM only in a given year and those that switched at some point during the year.

Table 2: Shorebased IFQ Vessels by Quota Compliance

Year	Observer only	EM only	Both
2016	50	36	9
2017	45	43	12
2018	50	40	7

Of those vessels that did switch between EM and observers throughout the year, the majority of the vessels either switched observation type one time (i.e., opted out of EM into observer coverage) or switched twice (i.e., went from EM to observer and back to EM). The majority of these were likely due to resolving EM issues, such as on "shake down" cruises, when a vessel used an observer onboard for a small number of trips while ensuring the EM system was correctly installed and functional. Only four vessels across the three years switched more than three times. Again, the Council may want to consider the administrative cost of allowing the exemption for EM vessels to remain at one ping per hour compared to increasing the ping rate to four per hour. Similar to above, the GMT recommends that NMFS provide cost estimates for the EM vessels for increasing the rate from one to four per hour.

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