

GROUND FISH ADVISORY SUBPANEL ON ELECTRONIC MONITORING PROGRAM GUIDELINES AND MANUAL REVIEW

The Groundfish Advisory Subpanel (GAP) received an overview of this agenda item from Mr. Brett Wiedoff and Mr. Justin Kavanaugh. The GAP offers the following comments and recommendations.

The GAP is extremely concerned that National Marine Fisheries Service (NMFS) appears to be moving toward implementation of an electronic monitoring (EM) program that will not be successful. This is not a new concern as can be seen in the following excerpt from our September 2019 statement:

In particular, the GAP shares the concerns expressed [in the GEMPAC statement] and in public comment about the direction of the electronic monitoring (EM) program development and its ability to meet program goals to reduce monitoring costs, particularly for those vessels with lower overall revenue.

Numerous Groundfish Electronic Monitoring Policy Advisory Committee (GEMPAC) statements, as well as prior GAP statements, have expressed similar stakeholder concerns. To put it bluntly, the audit requirements – the need to build a new in-house review shop within NMFS to conduct the audit, as well as primary review of “steaming time” – will significantly increase both industry and agency costs. This is likely to cause some current participants to leave the program, which would then further drive up costs for the remaining participants.

Instead, **the GAP urges the Council to recommend that NMFS retain the current EM program**, which is providing timely, accurate data in a cost-effective way. Under our proposal, the video review, data storage, and other functions would continue to operate exactly as they currently do. Pacific States Marine Fisheries Commission (PSMFC) would continue to provide those services, and there would be no audit requirement.

We understand that NMFS cannot pay for PSMFC to continue to run the current program out of its existing budget. EM stakeholders will pursue two parallel funding tracks: 1) We intend to pursue a congressional appropriation to fund PSMFC for a period of several years; and 2) We will work with PSMFC and whoever else we need to in order to develop a mechanism to allow industry to pay PSMFC (e.g. an escrow account, future contracting, etc.).

Recommendations:

- 1) Do not continue to move forward with implementation of 3rd party model**
- 2) Allow PSMFC to be a provider without requiring an audit**
- 3) Industry seeks congressional funding and a fix to allow industry to pay PSMFC**

Whether through direct industry funding or a congressional appropriation, the primary objective of the GAP is to maintain the current program because it works.