

GROUND FISH ADVISORY SUBPANEL REPORT ON ELECTRONIC MONITORING PROGRAM REVIEW

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

The GAP continues to see significant promise in the potential of electronic monitoring (EM) to reduce the costs of monitoring while increasing flexibility. Numerous people including fishermen, National Marine Fisheries Service (NMFS) staff, Council members and Council staff, Pacific States Marine Fisheries Commission staff, EM service providers, Enforcement Consultants, environmental representatives, and other stakeholders have invested significant time and resources to make that potential a reality. However, the GAP feels strongly that the current EM program (i.e. regulations, manual and guidelines) is not ready for implementation in 2021. There continues to be significant uncertainties that will directly affect program costs, as well as the ability of the program to be successfully implemented in 2021. Instead of rushing to implement an imperfect and incomplete program, the GAP recommends delaying implementation until 2022. The GAP concurs with the three primary recommendations contained in the [statement](#) of the Groundfish Electronic Monitoring Policy Advisory Committee (GEMPAC), as well as their detailed rationale. We've included the recommendations below for emphasis:

1. The Council should initiate an amendment process at this meeting to revise the existing final rule, change the effective date of the program, and incorporate the bottom trawl/midwater trawl program into the same rulemaking for consistency (if appropriate).
2. The Council should recommend that more time and meaningful consultation on the EM Manual and Guidelines take place between the GEMPAC, Council and the agency, as these dictate the most important components of the program for projecting costs and operations.
3. The Council should recommend to NMFS that the existing EFPs continue until the effective date of the new rule and that new vessels should be allowed to join the EFPs during this time.

In addition to the substantive uncertainties that need additional refinement and clarification, and there are many, in the current COVID 19 crisis, we'd prefer to see NMFS and the Council spend time on actions that will ensure fishing continues to operate as smoothly as possible and that fishermen and processors are able to continue providing high quality seafood to the public. Focusing energy on an unnecessary action with longstanding, unaddressed concerns expressed by both EM stakeholders and the Council itself is not the best use of staff time or resources at this moment.

The GAP further concurs with the GEMPAC's comments on proposed changes to the final rule. While those changes are an improvement, significant additional work is needed before this program is ready for regulatory implementation.