

GROUND FISH ADVISORY SUBPANEL REPORT ON ELECTRONIC MONITORING PROGRAM UPDATE

The Groundfish Advisory Subpanel (GAP) received an overview of this agenda item from Ms. Melissa Hooper and Mr. Brett Wiedoff. The GAP was also briefed on the Groundfish Electronic Monitoring Policy Advisory Committee (GEMPAC) discussion and statement by GEMPAC members Ms. Heather Mann and Ms. Melissa Mahoney.

The GAP continues to have serious concerns about the direction of the electronic monitoring (EM) program. We have noted in previous statements that EM offers significant potential to reduce the costs of monitoring in the individual fishing quota (IFQ) fishery. We have also noted that EM can be a less intrusive, more flexible, and safer means of providing monitoring, as has been clearly illustrated by the COVID-19 crisis. Unfortunately, based on current estimates provided in the GEMPAC statement, it appears that the EM program in this 3rd party model design may not reduce overall fleet monitoring costs or monitoring costs for lower revenue vessels as intended.

As noted in the GEMPAC statement, the [first objective](#) of the program is to reduce total fleet monitoring costs to levels sustainable for the fleet and National Marine Fisheries Service (NMFS). Despite that clear objective and [Council directives beginning in 2017](#) that NMFS produce accurate, comprehensive cost estimates and a fully articulated program design, we still do not have a complete picture of what the program will cost and therefore whether it will meet this objective. We understand NMFS is currently working on estimates, but we do not expect those to be ready in time for review and consideration in this statement. Since this is the last time the Council is scheduled to address this issue before implementation, NMFS' failure to provide the very information required to determine whether the program will achieve its objectives is unacceptable. Relatedly, the EM service provider manual is unchanged since July 2020 and still does not provide EM providers with complete information on video review protocols, so they are not able to develop business arrangements or even generate accurate cost estimates.

Given that, the GAP strongly endorses the recommendations in the GEMPAC statement:

1. The Council should request NMFS compile and provide accurate cost estimates based on input provided by EM providers and Pacific States Marine Fisheries Commission so that the Council can determine if the 3rd party model meets the goals and objectives of the EM program.
2. The Council should schedule additional floor time in 2021 once more accurate cost information is available to consider “fully articulated program design alternatives and cost information is available to make an informed decision on whether moving to a 3rd party provider or staying with a sole provider model best meets the goals and objectives of the program.” This was included in a motion passed by the Council in April 2017.
3. If the proposed program does not meet the Purpose and Need and objectives for this action, then the Council should rescind its decision to use the 3rd party model and replace it with

a sole provider model. Further the current EM program should remain in exempted fishing permits until such time that a regulatory program which meets the goals and objectives can be implemented.

The GAP agrees completely. The Council should schedule additional floor time on this issue at the April meeting and NMFS should provide accurate cost estimates far enough in advance of that meeting to allow for meaningful discussion. If, at that future meeting, it appears that the program does not meet the program objectives, then the Council should urge NMFS to pursue a more cost-effective approach, like a sole-source provider model.

Accountability has been a cornerstone of the IFQ program and has produced significant conservation benefit, reducing uncertainty and fostering more rapid rebuilding. We need to figure out how to maintain full accountability at a reasonable cost, and while we do not have the information to determine whether this program can do that, indications are that it will raise costs to an unsustainable level, reducing current participation and driving up costs for remaining participants. The last thing we want to do is force through a program, at significant cost to NMFS and industry, if the program does not meet its objectives and few people will ultimately use it.

PFMC
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