

# **ELECTRONIC MONITORING PROGRAM- RANGE OF ALTERNATIVES**

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March 2023

# Overview of Presentation



HISTORY/OVERVIEW  
PURPOSE AND NEED

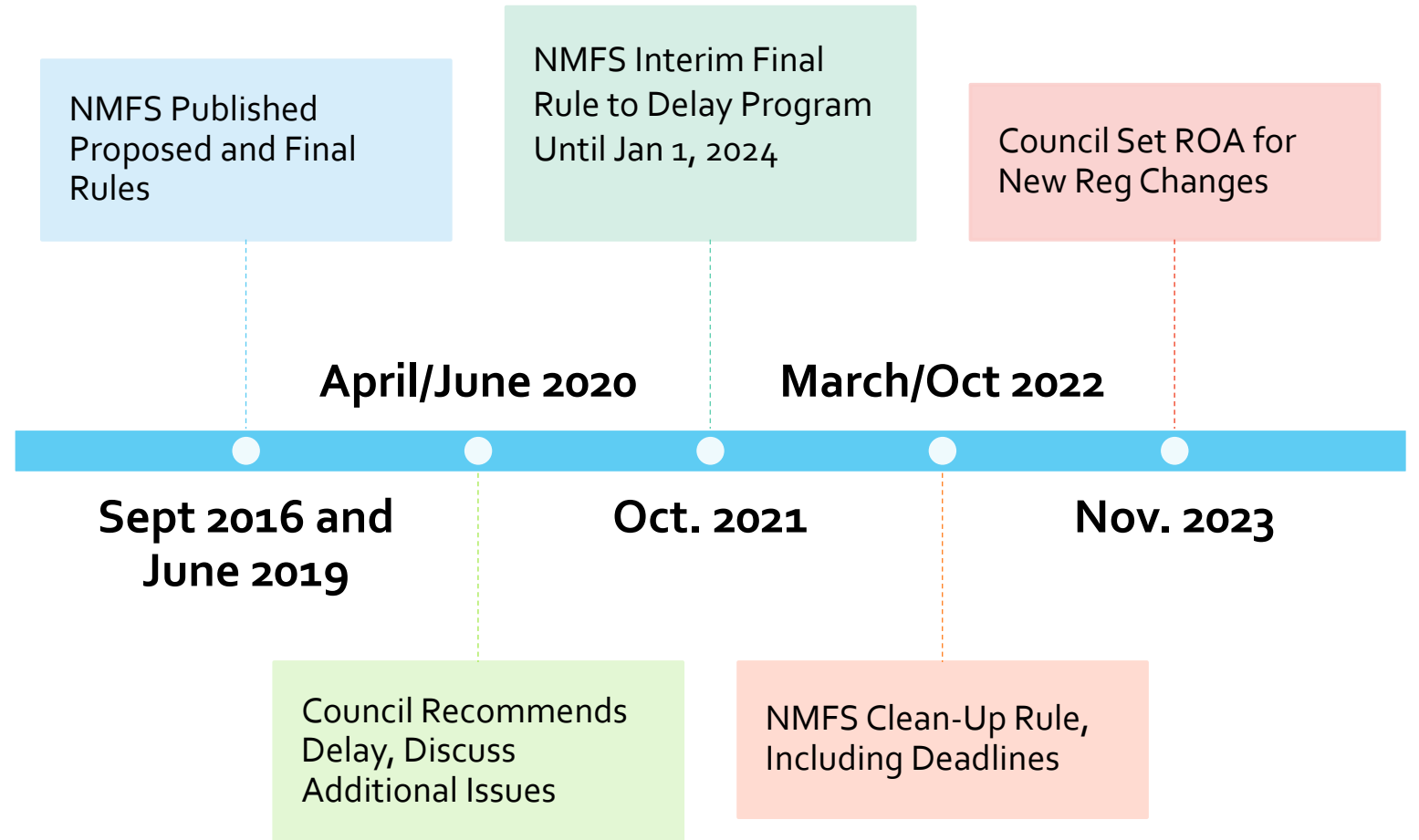


PRELIMINARY ASSESSMENT  
OF EACH ALTERNATIVE



DRAFT COST  
ANALYSIS/NEXT STEPS

# History of Current Regs in EM Program



# March 2023 Council Action

**Adopt Final Preferred Alternative, as needed.**

Intent is to implement Reg Changes for Jan 1, 2024

Discuss during March Mtg:

- Potential Changes to EM Manual and Business Rules for Review
- Possible Agenda Item: “EM Update” for June 2023 check-in on Proposed Rule, Discuss EM Manual Changes, Established Provider Criteria

# Overview of Analysis

- Action is largely administrative so none of the alternatives have the potential to have an affect on the human environment – Regulatory Amendment with Supporting Analysis
- Analysis: Discuss potential impacts to EM Providers, EM Participants, NMFS Administration, and Enforcement
- Cost Analysis: Focused on Current Program under PSMFC and Future Costs when EM Program is Implemented

# Draft Cost Analysis and Assumptions

- Assume vessel review rates of 100 percent for maximized retention and 25 percent for optimized retention – no failed trips/lowest cost
- 25 percent was established in the EM manual as the lowest rate for certain gear type however, we note that ten percent is the lowest review rate possible as recommended by the Council in 2014
- Therefore, we provide cost estimates for both rates to establish baselines of potential future costs by gear type.

# Draft Cost Analysis and Assumptions

- Compare current program costs under PSMFC (100% review for all) to potential future costs once the program is implemented.
- Discuss the potential effects of the alternatives on those future costs and identify where cost savings in the program may occur under these assumptions

# Next Steps for Analytical Document

- Desire was to provide an advanced copy to GEMPAC/TAC last week for feedback
- Provide feedback regarding things to consider in analysis
- Need full NFMS review of draft analysis
- Submit to Advanced Briefing Book



# Purpose and Need

- This action is needed because the current regulatory deadlines for EM video review providers to submit required electronic monitoring (EM) feedback reports to fishing vessels, and video review data summary reports as well as logbook data to NMFS may be too restrictive.
- In addition, clarification of the process to evaluate and summarize EM video review data via the EM manual, and referenced in the federal regulations, may be needed.

# Purpose and Need

- This action is largely administrative and would not impact the natural environment. Fishery participants under the EM program would likely not be negatively affected.
- It's expected that an extension of the regulatory deadlines and clarifications in the EM manual would provide positive benefits to participants, create some efficiencies and lower overall costs of the program.

# Range of Alternatives

- Alternative 1 - No Action
- Alternative 2 - 60 Days to Submit Feedback/EM Summary Reports
- Alternative 3 - 90 Days to Submit Feedback/EM Summary Reports
- Alternative 4 - Seven Business Days to Submit Logbooks
- Alternative 5 - Revise EM Discard Data Review Language

# Alternative 1 – No Action

## Description

No Change to Deadlines:

1. EM summary/feedback reports- 3 weeks
  2. Logbook submission – 2 business days
- EM Manual language remains the same
  - Assume 100% (maximized retention) and 25% (optimized retention) video review would apply.

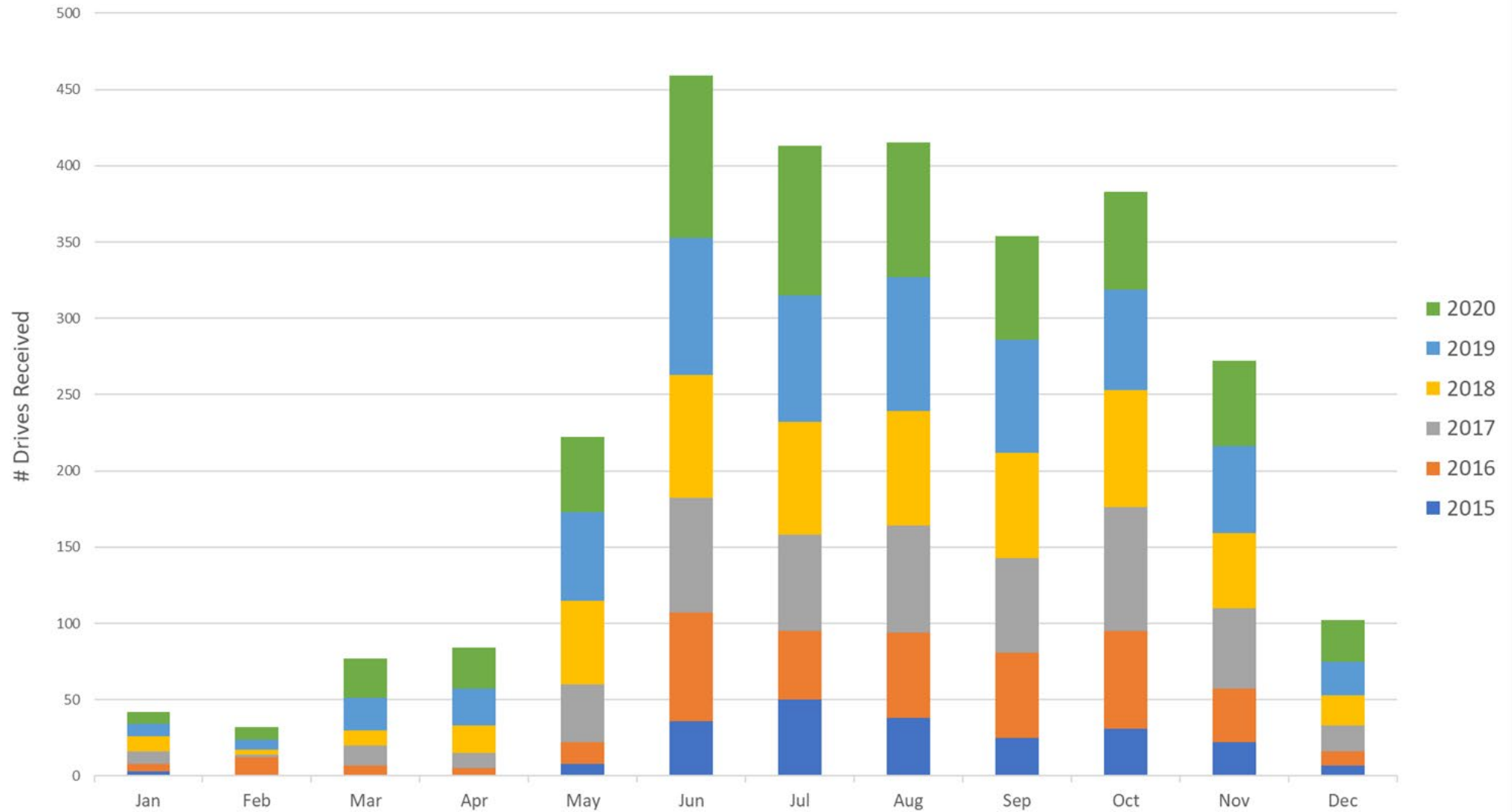
## Potential Impacts

- No impacts to EM Providers/Participants, NMFS Admin, or Enforcement

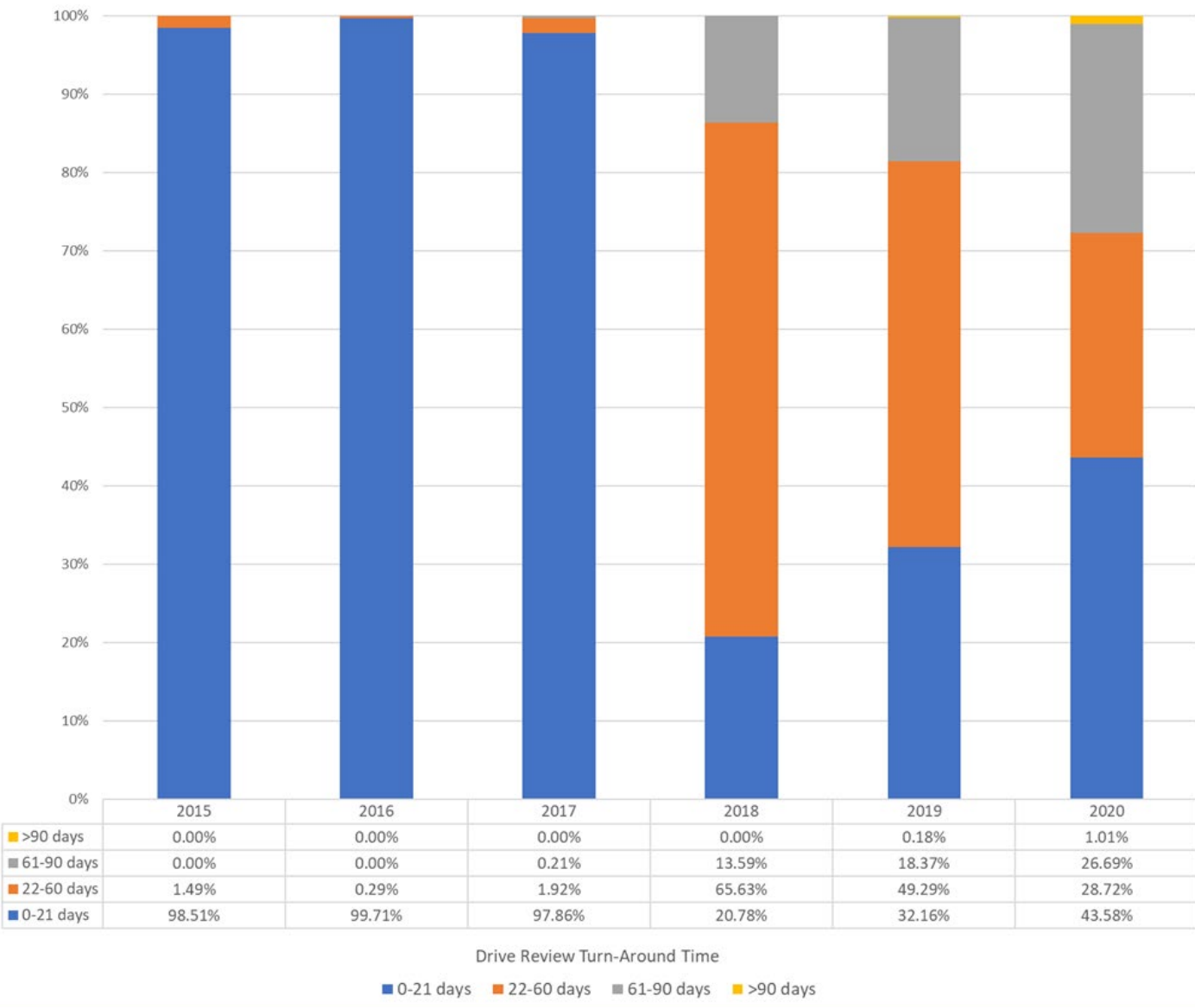
## Potential Costs

- None based on 2022 Rule

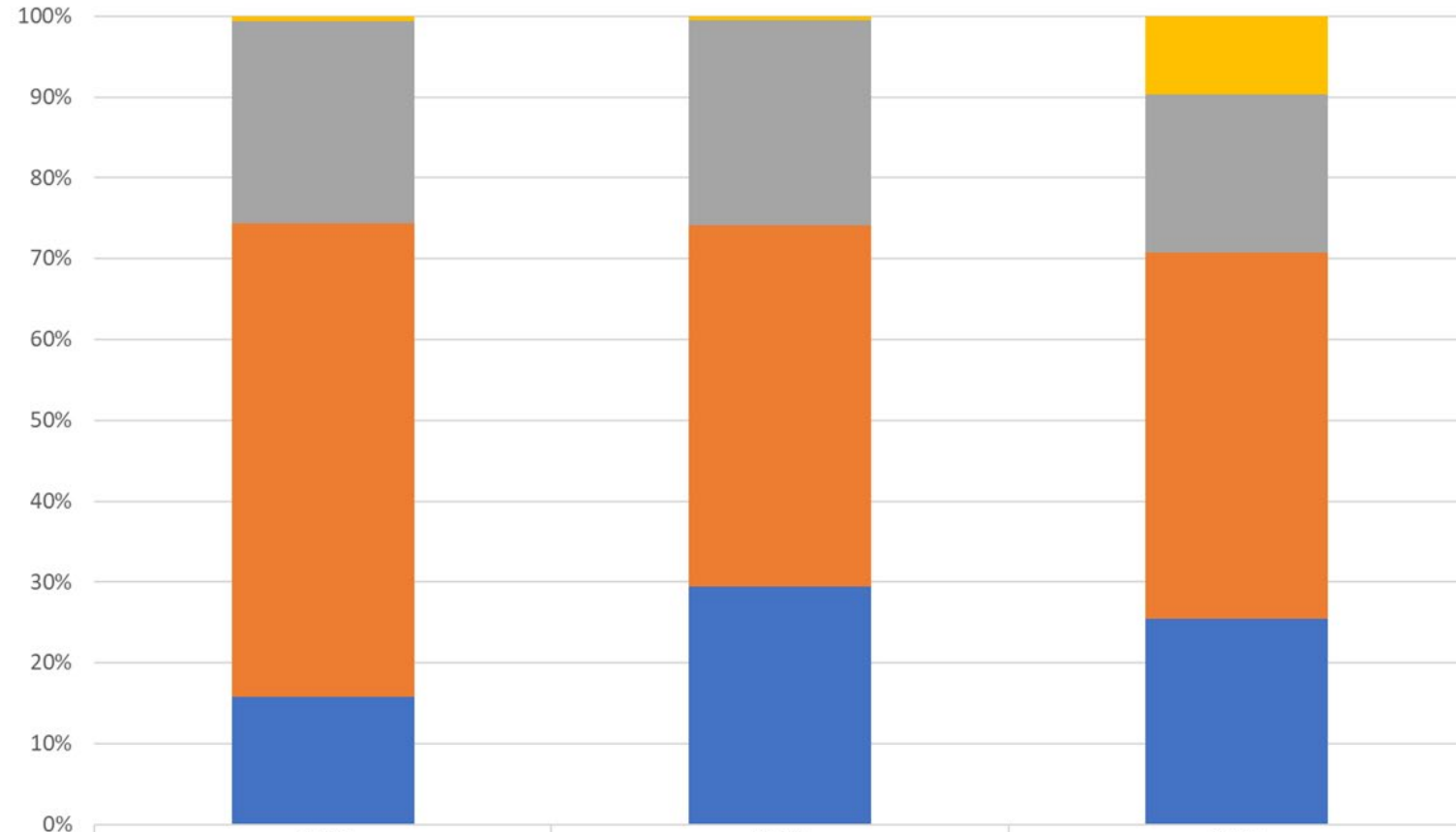
West Coast EM EFP: Yearly Drive Submission Frequency per Month (2015-2020)



### West Coast EM EFP Drive Review Turn-Around Time (2015-2020)



### West Coast EM EFP Feedback Turn-Around Time (2018-2020)



	2018	2019	2020
>90 days	0.58%	0.53%	9.66%
61-90 days	25.10%	25.40%	19.66%
22-60 days	58.56%	44.58%	45.25%
0-21 days	15.76%	29.48%	25.42%

Feedback/Drive Report Turn-Around Time

■ 0-21 days ■ 22-60 days ■ 61-90 days ■ >90 days

# Alternative 2

## Description

- 60 Days to Submit Feedback/EM Summary Reports vs 21 days (3 weeks)

## Potential Costs /Savings

- Potential for no added costs to est. future costs
- Minimal savings could be realized

## Potential Impacts

- May provide more flexibility to handle pulses of hard drive submissions to EM providers (summer and fall)
- Could limit the need for additional full-time employees to meet the 3-week deadline vs a 60-day
- Provide more accurate estimated costs to potential EM participants via estimating video review workload
- Longer timeframe to receive feedback report/delay corrective action if needed/potential loss of data
- NMFS Admin – less frequent data updates received/secondary review may be delayed
- Enforcement – delay in receiving vessel reports = delay in follow-ups with vessels, unclear how recent delays have affected enforcement responsibilities



# Alternative 3

## Description

- 90 Days to Submit Feedback/EM Summary Reports

## Potential Costs/Savings

- Similar to Alt 2 – no discernable diff between Alt 2 and 3
- Potential for no added costs to est. future costs
- Minimal savings could be realized

## Potential Impacts

- Similar to Alt 2
- Further delays beyond 90 days could affect IFQ accounts/end-of-year balances
- More risk regarding potential data loss since corrective action would be delayed longer

# Alternative 4

## Description

- Seven Business Days to Submit Logbooks

## Potential Costs/Savings

- No discernable changes in costs

## Potential Impacts

- Delay in updating vessel account, initially
- Expect fisherman to monitor discards via their logbooks and track any change in their quotas to prevent surprise overages
- More flexibility for EM providers to manage data flow and hard drive submissions
- Do not expect substantial changes in NMFS administration or Enforcement

# Alternative 5

## Revise EM Discard Data Review Language

from:

“The EM service provider must process vessels' EM data and logbooks according to a prescribed coverage level or sampling scheme, as specified by NMFS in consultation with the Council, and determine an estimate of discards for each trip using standardized estimation methods specified by NMFS. NMFS will maintain manuals for EM and logbook data processing protocols on its website.”

To be:

“The EM service provider must process vessels' EM data and logbooks according to a prescribed review methodology, as specified by NMFS in the EM Manual on its website.”

# Alternative 5

## Potential Impacts

- EM Providers benefit from clear and consistent language
- No impacts expected to EM participants, NMFS Administration or Enforcement

## Potential Costs/Savings

No change in cost identified

Questions?