## ENFORCEMENT CONSULTANTS REPORT ON ELECTRONIC MONITORING PROGRAM CHANGES - FINAL PREFERRED ALTERNATIVE

The Enforcement Consultants (EC) have reviewed reports associated with electronic monitoring (EM) and have the following comments.

The EC agrees with the recommendation of moving alternatives 2, 4 and 5 forward as final preferred alternatives (FPA). Regarding alternative 2, we continue to have concerns regarding delaying the timely review of video and subsequent feedback to vessels, since any identified issues may have occurred for some time before being addressed but can accept up to 60 days given the majority of feedback will occur sooner than that.

Members of the EC attended the Groundfish Electronic Monitoring Policy Advisory Committee (GEMPAC)/Groundfish Electronic Monitoring Technical Advisory Committee (GEMTAC) meetings on January 31st and February 3rd, 2023, and the EC reviewed F.5.a, GEMPAC Report 1 and appreciate the GEMPAC/TAC proposing additional changes to the EM program, including changes to the video review rates in the EM Program Manual and recommending changes to the business rules related to increased video reviews. In November, the EC recommended the percentage of video review not be reduced from the level it is currently set at (i.e. 100 percent and 25 percent depending on the fishery). We still caution against any review less than this, however we appreciate and can accept an initial 10 percent review rate, understanding that this rate can be reconsidered based upon observed compliance rates.

The EC also reviewed the proposed language in the GEMPAC report intended to clarify when additional video reviews will be triggered and how many trips will fall under the increased review rate. The EC appreciates the proposal but would like to have additional discussion and consideration on what triggers increased review and when and for how long it will be in place. For example, the proposal is for review of 100 percent of the hauls in an identified trip, plus two additional trips after notification. The EC would prefer consideration of 100 percent review for the initial trip, plus a random number of trips (e.g., 2-5) after notification and over a set period of time (e.g., 2 months). This would have a greater impact on compliance since the vessel would not know which trips were increased to 100 percent review.

PFMC 03/06/23