

AGENDA ITEM F.5 ELECTRONIC MONITORING PROGRAM- RANGE OF ALTERNATIVES

March 2023

Briefing Book Items

- Attachment 1: Executive Summary - Draft Analytical Document
- Supplemental Attachment 2: Electronic only - Draft Analytical Document
- GEMPAC Report 1: Electronic Monitoring Program Changes

Overview of Analytical Document



HISTORY/
PURPOSE AND NEED

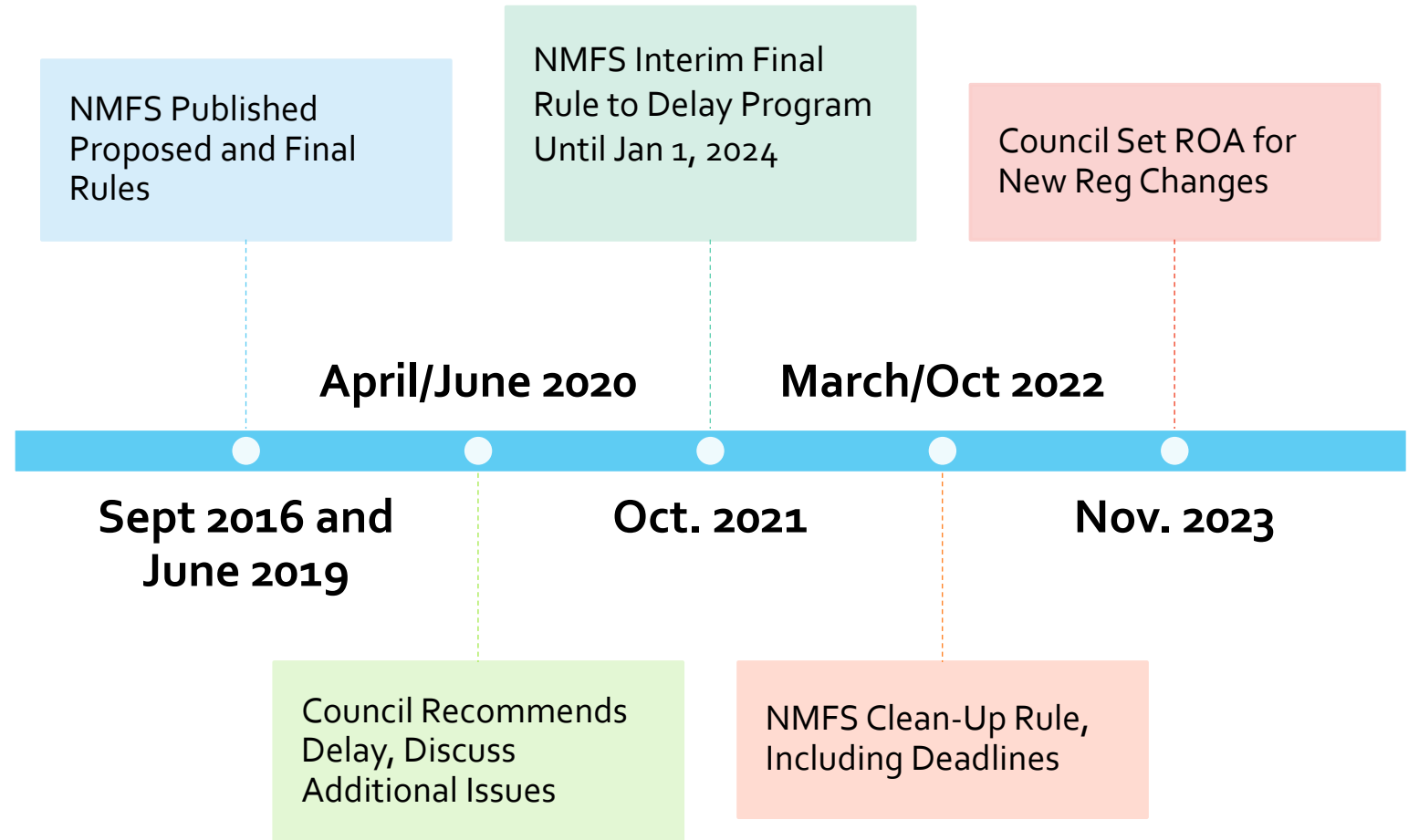


IMPACT ASSESSMENT OF
EACH ALTERNATIVE



CONSIDERATIONS/NEXT
STEPS

History of Current Regs in EM Program



March 2023 Council Action

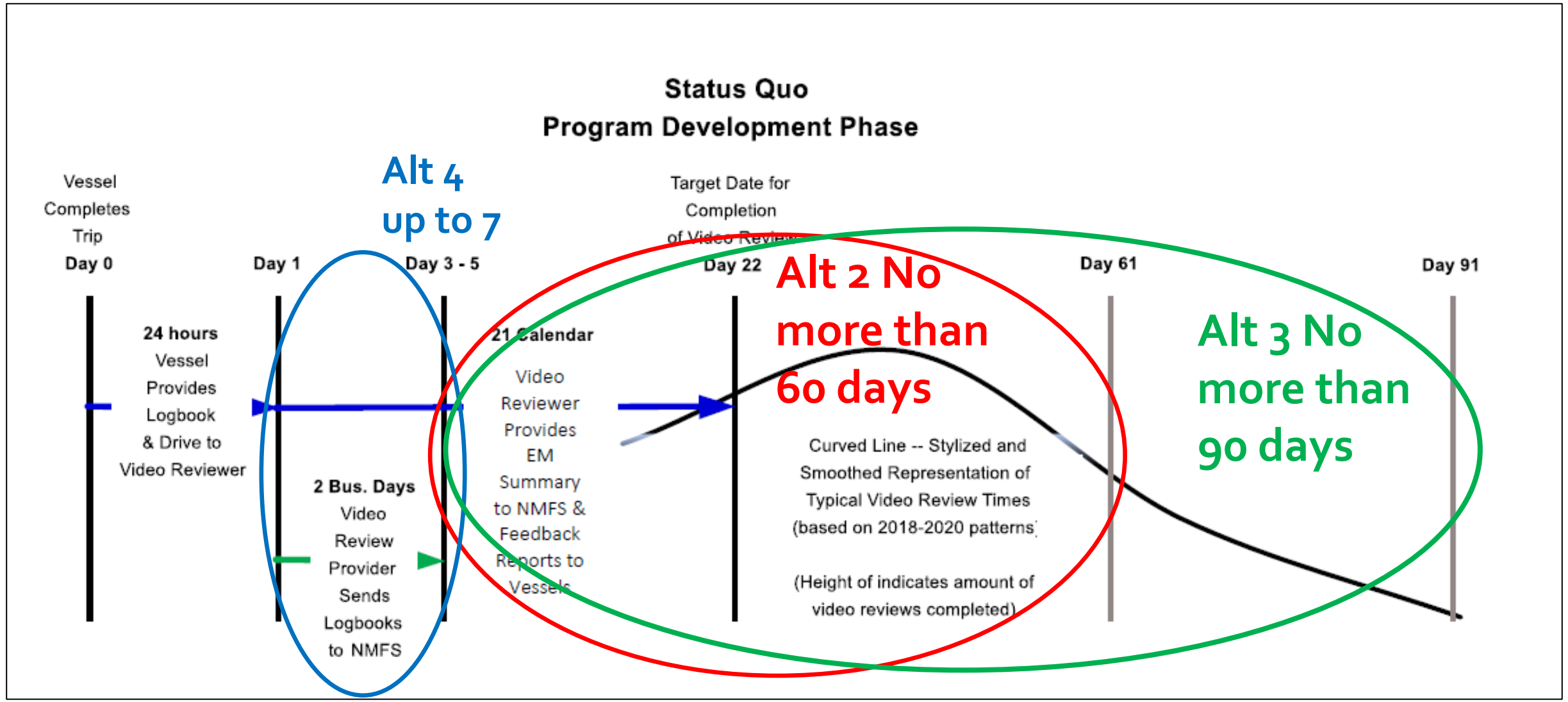
- 1. Adopt Final Preferred Alternative, as needed.**
- 2. Provide guidance as appropriate.**

Intent is to implement any reg changes prior to Jan 1, 2024
(EFPs authorized through 2023)

Make changes to EM manual per Council action and guidance

The Problem We Are Facing

Data Flow Under PSMFC Video Review



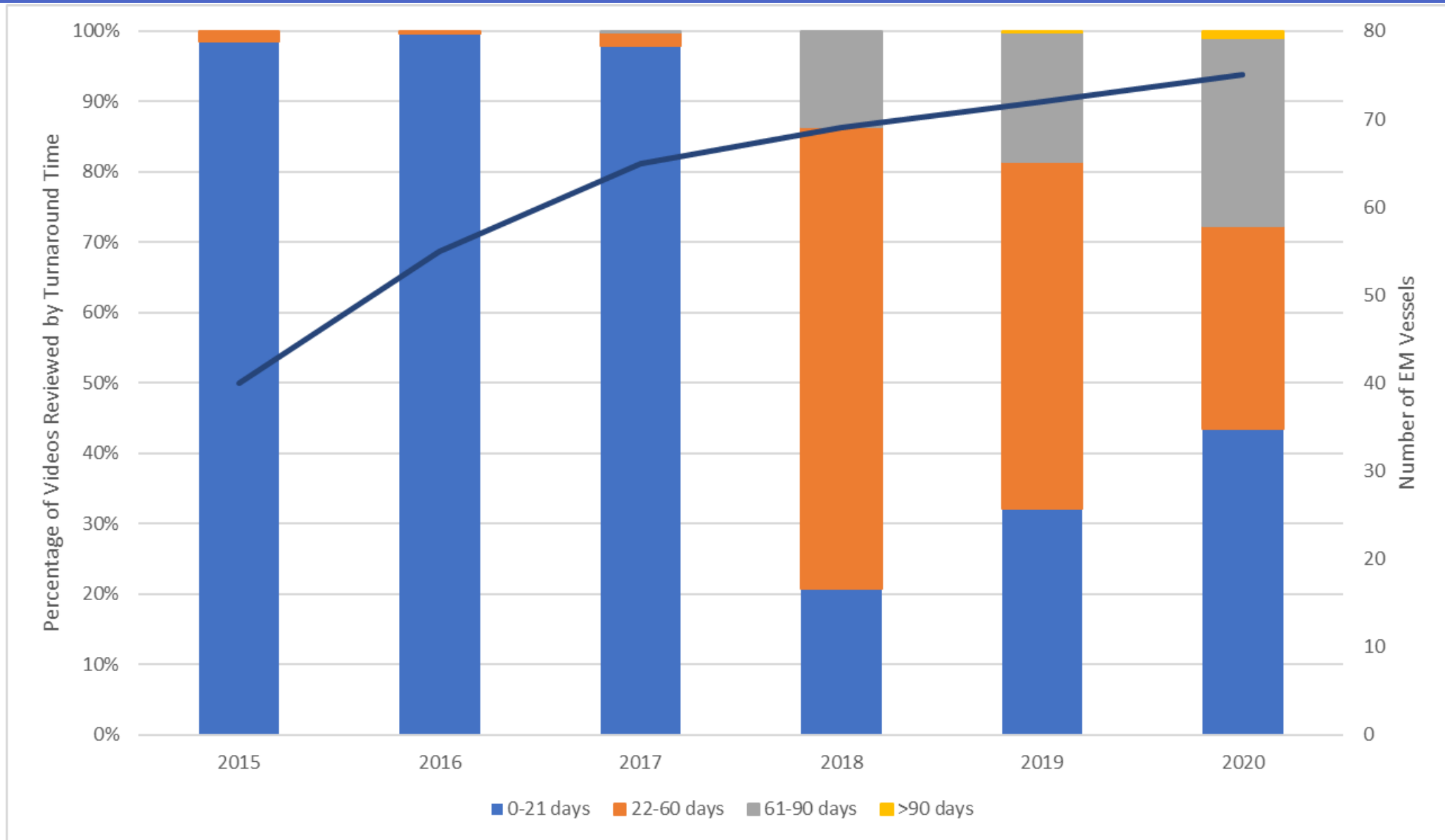


Figure 2. Percentage of videos reviewed by turnaround time from 2015-2020 (bar graph; left axis) and the number of vessels participating in the EM EFPs (line graph; right axis).

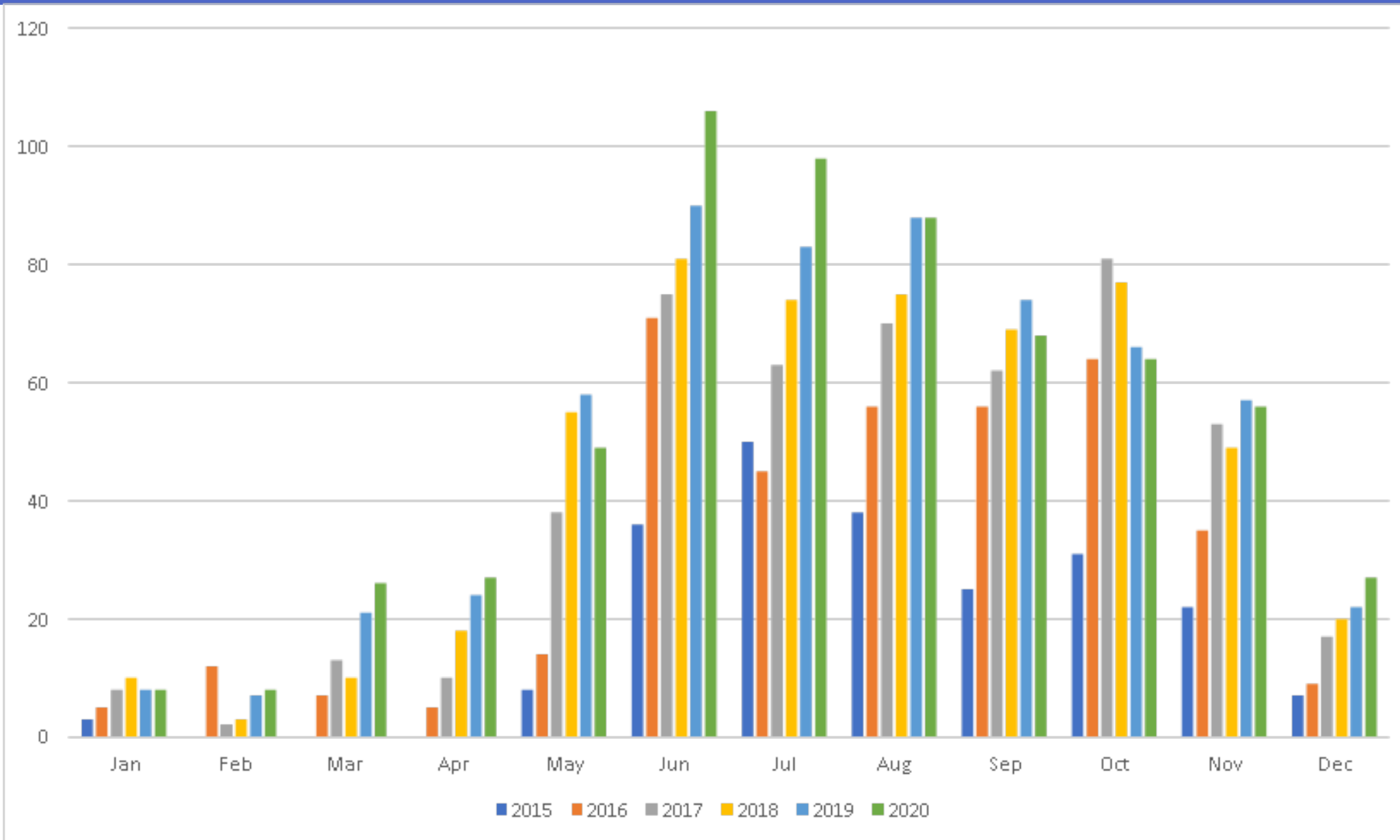


Figure 3. Number of EFP hard drives received per month from 2015-2020.

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

Purpose and Need Statement

This action is needed to create and ensure flexibility in the electronic monitoring (EM) program in order to reduce potential costs.

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The purpose of extending the regulatory deadlines and clarifying regulations regarding the EM Manual is to provide positive benefits to participants and the nation, and to lower overall costs of the program while still meeting the data collection and data quality requirements of the EM program.

Overview of Analysis

- Action is largely administrative, do not expect the alternatives to affect the natural environment (fish, habitat, etc.)
- Discuss non-fiscal and fiscal impacts to EM Providers, EM Participants, NMFS Administration, and Enforcement
- Data completeness and potential changes in the compliance ethic in the fishery

Cost Analysis

- Compare current program costs under PSMFC (Status Quo, 100% video review) to potential future costs once the program is implemented (No Action, with assumptions).
- Discuss the potential effects of the alternatives on future costs identify where costs change

Note: Appendix A has additional cost info from PSMFC;
Appendix C has past cost analyses by NMFS

Assumptions for Analysis

- For the No Action and Action Alternatives 2 - 5
- Per the current EM Manual – video review rates would be:
 - 100 % for maximized retention (midwater whiting & non-whiting)
 - Low of 25 % for optimized retention (bottomtrawl, fixed gear)
- Analysis assumes no failed trips to assess the potential lowest cost

Status Quo – PSMFC Video Review

Description

1. Under EFPs 2015- 2023
2. Video review is 100% for all vessels/hauls
3. EM summary/feedback reports is taking more than 3 weeks (up to 90 days at times)
4. Logbook submission – up to 7 business days

Status Quo Video Review Cost Estimates

	Midwater Trawl (100% review)	Fixed Gear (100% review)	Bottomtrawl (100% review)
TOTAL PER SEA DAY	\$114.20	\$283.10	\$345.33
TOTAL FLEET COST	\$353,796	\$73,889	\$119,311
PSMFC TOTAL EST. PROGRAM COSTS FOR REVIEW	\$546,995		

Table 6 and Appendix A for more detail. Turnaround time of ~40-60 days, used 2023 staffing costs, does not include equipment & maintenance costs

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 expected impacts to EM Providers, NMFS Admin, or Enforcement

Potential Changes in Costs

- Increased costs to EM Participants (due to program implementation)

Alt 1 (No Action) Video Review Cost Estimates

	Midwater Trawl (100% review)	Fixed Gear (25% review)	Bottomtrawl (25% review)
TOTAL PER SEA DAY	\$143.75	\$195.63	\$232.49
TOTAL FLEET COST	\$445,337	\$51,059	\$80,324
PSMFC TOTAL EST. PROGRAM COSTS FOR REVIEW	\$576,720 (incr. of \$29,725 compared to Status Quo)		

Table 7 and Appendix A, Assume 100% (maximized retention) and 25% (optimized retention), 3-week turnaround time, 2 business day logbook submission

Alternative 2

Description

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

Potential Costs

- Some savings could be realized compared to No Action

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 3-week deadline vs 60-day
- Longer timeframe to receive feedback report = delay corrective action if needed/potential loss of data
- Enforcement – delay in receiving vessel reports = delay in follow-ups with vessels
- Delayed QA/QC by NMFS secondary review

Alt 2 (60 day) Video Review Cost Estimates

	Midwater Trawl (100% review)	Fixed Gear (25% review)	Bottomtrawl (25% review)
TOTAL PER SEA DAY	\$114.20	\$150.12	\$175.69
TOTAL FLEET COST	\$353,796	\$39,181	\$60,701
PSMFC TOTAL EST. PROGRAM COSTS FOR REVIEW	\$453,678 (decrease of \$123,042 compared to No Action)		

Table 9. 60-day turnaround time, no failed trips, 2023 staffing costs, does not include equipment & maintenance costs

Alternative 3

Description

- 90 Days to Submit Feedback/EM Summary Reports

Potential Costs

- No Cost Estimates provided in Analytical doc
- More savings could be realized than Alt 2 and No Action

Potential Impacts

- Similar to Alt 2
- More flexibility for EM providers to manage data flow and hard drive submissions
- Longer timeframe to receive feedback report/delay corrective action if needed/potential loss of data
- Enforcement – delay in receiving vessel reports = delay in follow-ups with vessels
- More risk regarding potential data loss since corrective action could be delayed longer

Alternative 4

Description

- Seven Business Days to Submit Logbooks (11 calendar days)

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 - EM Discard Data Review Language

Revise 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
- Flexibility to innovate to potentially lower costs over time

Potential Guidance & Considerations

Request to modify video review rate in the EM Manual from 25% to 10% for Optimized retention fisheries

Modifying video review business rules in the EM Manual

Potential future regulatory changes regarding the discard species list in the regulations

March 2023 Council Action

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- 2. Provide guidance as appropriate.**