



North Pacific Fishery Management Council

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National Fish & Wildlife Foundation
1133 Fifteenth Street, NW
Washington, DC 20005

Dear Sir or Madam:

On behalf of the North Pacific Fishery Management Council (Council), I am writing in support of proposals related to Alaska fisheries that have been submitted in response to the Electronic Monitoring (EM) and Reporting Request for Proposals, and which are directly responsive to the Council's priorities and plans for trawl and fixed gear EM programs:

- Proposal from United Catcher Boats (UCB) and Alaska Groundfish Data Bank to improve and expand EM systems onboard pollock mid-water trawl catcher vessels in the Bering Sea and Central Gulf of Alaska
- Proposal from the Alaska Longline Fishermen's Association (ALFA) and North Pacific Fishermen's Association (NPFA) to develop machine learning algorithms that can evaluate image quality; and to field test a lower cost, portable EM system for deployment in remote ports.
- Proposal from the Fishing Vessel Owner's Association (FVOA) to form and test an industry run co-op model that will contract with existing NMFS-certified observer contractors and electronic monitoring (EM) providers to improve cost efficiencies in the current partial coverage observer program.

The Council has been active in pursuing the development of EM technology for several years. Between 2014 and 2017, the Council's priority was cooperative research for fixed gear vessels, field testing the use of camera systems and integrating fixed gear EM data with catch accounting databases, for the purpose of obtaining estimates of at-sea discards. Thanks in large part to support from NFWF, the Council was able to implement a regulatory framework in 2017 to allow EM as an alternative to carrying an observer to meet the monitoring requirements for the fixed gear groundfish and halibut fisheries off Alaska. The fixed gear EM program has been operational since 2018 and has successfully met the initial objectives of providing an alternative for fixed gear vessels that have difficulty accommodating a human observer. It has steadily gained popularity, with increasing numbers of vessels enrolling each year and a total of 169 vessels participating in 2020.

With an operational fixed gear EM program in place, the Council turned its attention to Bering Sea and Gulf of Alaska pelagic trawl catcher vessels, initially those participating in the pollock fishery. The Council has great need for more precise estimates of bycatch in trawl fisheries and recognizes the demonstrated value of EM systems to improve cost efficiency, reduce bias and increase precision of bycatch monitoring for vessels that are delivering to tender vessels. Through the Council's Trawl EM Committee, which brings together representatives from the fishing industry, management and

enforcement agency representatives, and EM service providers, the Council developed a robust Cooperative Research Plan, and adopted the following objectives for trawl EM development:

- improve salmon bycatch accounting;
- reduce monitoring costs; and,
- improve the overall quality of monitoring data.

In 2019 NFWF provided support for several proposals for Alaska fisheries, which the Council greatly appreciates, that have improved the fixed gear EM program and supported significant progress in the development of trawl EM. External funding is essential for development of these programs, as revenue from the partial coverage observer fee (used to fund monitoring costs throughout Alaska) can only be used to support EM once a program is implemented in regulation. The proposals that are being submitted this year build on and extend the accomplishments from the projects funded in 2019.

In 2020 an Exempted Fishing Permit (EFP) was issued for two years to evaluate the efficacy of electronic monitoring systems and shoreside observers for pollock catcher vessels using pelagic trawl gear in the eastern Bering Sea and Gulf of Alaska. The project combines EM systems that provide at-sea monitoring of vessels for compliance with fishery management objectives to achieve maximized retention, electronic reporting of catch and discard information, and shoreside observers to monitor salmon bycatch and collect biological information. To date, 41 vessels have participated in this EFP and there is interest from an additional 24 vessels to participate in the second year.

The Council supports the **trawl catcher vessel proposal, submitted by UCB and Alaska Groundfish Data Bank**, which would improve existing EM operations and expand the number of participating vessels with EM camera systems under the EFP in central Gulf of Alaska and Bering Sea fisheries. This will capitalize on the initial successes accomplished in the first year of the program, and gain needed efficiencies to achieve the Council's objectives for developing a trawl EM program that both reduces costs and improves data quality. It complements the EM development currently underway in the western Gulf of Alaska; managers of both projects coordinate regularly, exchange progress reports and results and jointly address problems. With the increased participation in EM field testing and development that would be supported with this proposal and the ongoing work in the western Gulf, the Council and NMFS should have the requisite information to prepare and implement a trawl EM regulatory package.

The Council also supports the joint **proposal from ALFA and NPFA** that would develop machine learning algorithms that can evaluate image quality in near real time and provide immediate feedback to the vessel operators; and to field test a lower cost, portable EM system for deployment in remote ports where the vessel operator can self-install it without the need for in-person technical support. The proposal would test methods to improve image quality and provide more cost-effective hardware for the fixed gear EM program to continue to improve on the Council's objectives of reducing monitoring costs by reducing service and equipment costs; and, improving the overall quality of monitoring data.

The Council also supports the **industry run monitoring co-op proposal from FVOA** to form co-ops that could contract directly with existing NMFS-certified observer providers and EM providers in 2021-2022, outside of the current Federal contract but remaining compatible with the structure of the partial coverage program. The co-op would provide for all required monitoring needs (i.e., observers and EM) while NMFS remains responsible for determining the data and monitoring requirements. The proposal could advance EM optimization in the fixed gear fleet while testing alternate, lower-cost EM systems and data service models, and test whether greater cost efficiencies could be gained in the partial coverage observer program for at-sea observers than are currently realized under the government contracting system.

In summary, the Council recognizes the value of the proposals submitted by the Alaska regional stakeholders for the expanded development of EM as a compliance and catch accounting tool in Bering Sea and Gulf of Alaska trawl and fixed gear fisheries, and continued studies of EM hardware and data quality, with a focus towards meeting the Council's goal of reducing costs and improving data quality for our successful fixed gear EM program. The industry co-op proposal offers an alternative to the current Federal contracting processing, which has reliably provided observers in the challenging environment of Alaska fisheries, but has not met the Council and industry's cost containment expectations. If successful, it may also provide a model for public/private operation of a partial coverage observer program, analogous to the successful public/private partnership of the Council's full coverage program.

On behalf of the Council, I hope that you will consider the proposals submitted from these stakeholders favorably.

Sincerely,



Simon Kinneen
Chairman