



North Pacific Fishery Management Council

Simon Kinneen, Chair | David Witherell, Executive Director
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December 21, 2022

Ms. Janet Coit
Assistant Administrator, NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910
Via email: janet.coit@noaa.gov

Dear Ms. Coit,

The North Pacific Fishery Management Council has been working for years, in collaboration with industry, to develop and implement a Trawl Electronic Monitoring (EM) Program. This has been a key part of improving data quality and cost efficiency in the pelagic trawl fisheries in both the BSAI and GOA and has only strong support from stakeholders. The Council took final action at our October 2022 meeting with the understanding that this timeline allowed for a regulated program to be implemented in January 2024. The timeline is critical as the trawl EM program is currently operating under an Exempted Fishing Permit (EFP) which is set to expire at the end of 2023, with the majority of funding provided by grants procured by the fishing industry from the National Fish and Wildlife Foundation. Participants did not submit grant proposals for 2024 given the agency's commitment to transitioning to a regulated program by then. The January 2024 target for implementation of a regulated trawl EM program is critical to assure continued operation of the program, given the current EFP timeline and funding expectations and commitments.

At our December meeting, the Council was informed that the earliest possible rulemaking for a regulated trawl EM program will now be January 2025, due to unexpected changes to staffing resources at the Alaska Region of the NOAA Fisheries Sustainable Fisheries Division. The Alaska Region expressed a commitment to extending the EFP and maintaining an operational trawl EM program until the program is implemented in regulation, but funding is an issue. The Council would like to acknowledge this commitment from the Alaska Region and express our support that the trawl EM program continue to operate uninterrupted until regulatory implementation. A one-year hiatus of the program would be costly, problematic, and would likely reduce current participation and new participation from vessels that have expressed intent. It would also negate the benefits of improved bycatch data and cost efficiencies that are already occurring under the EFP.

The Council encourages NOAA Fisheries to secure adequate funding to support continued operation of the trawl EM program, including expanding participation to new vessels, during this unexpected additional year before regulatory implementation. The Council is particularly interested in support from the Office of Science and Technology's Electronic Monitoring/Electronic Reporting (EM/ER) and Fisheries Information Systems funding, or potentially the EM/ER and Catch Share Program funding from the Office of Sustainable Fisheries (recognizing that catch share funds could only be applied to the full coverage portion of the trawl EM program). Additionally, Community Directed Funding was identified as a possible source of funds, that although specified as supporting one-time costs, may assist in the expansion of the program to include new vessels in 2024.

Developing and implementing EM on pelagic trawl vessels was identified by the Council as a regional Electronic Technology implementation priority in 2018. Given the importance of this program, and the years of dedication and engagement from the Council's Trawl EM Committee, affected stakeholders, NMFS AKR and enforcement agency representatives; the Council requests NOAA fisheries provide the appropriate resources to support the sustained operation of a trawl EM program until a regulated program is implemented in January 2025.

Sincerely,

A handwritten signature in blue ink, appearing to read "Simon Kinneen".

Simon Kinneen
Council Chair