



NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

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National Fish & Wildlife Foundation
1133 Fifteenth Street, NW
Washington, DC 20005
Via email: Gray.Redding@nfwf.org

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 are directly responsive to the Council's EM priorities:

- Proposal from Alaska Groundfish Databank and Aleutians East Borough for the Pre-Implementation of a Regulated EM Program for Compliance Monitoring in the Gulf of Alaska Pelagic Trawl Pollock Fishery
- Proposal from Real Time Data to test electronic logbook data collection and reporting in Alaska's groundfish and halibut fisheries
- Proposal from Saltwater Inc Enhancing Observer Efficiency in Alaska Processing Plants through Electronic Monitoring
- Proposal from North Pacific Fisheries Association to evaluate and test alternative catch handling protocols for single pot gear in the EM program
- Proposal from Alaska Groundfish Databank for Testing Electronic Monitoring on Trawl Catcher Vessels Participating in the Central Gulf of Alaska (CGOA) Rockfish Program: Pilot Phase 2

The Council has actively pursued the development of EM technology for several years. Thanks in large part to support from NFWF, the Council was able to implement a fixed gear EM program that has been operational since 2018 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. 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 participating in the pollock fishery. The Council has been working for years, in collaboration with industry, to develop and implement this Trawl 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. NFWF grants have been instrumental in supporting the development and expansion of this program.

The Council strongly supports the **proposal from Alaska Groundfish Databank and Aleutians East Borough for the Pre-Implementation of a Regulated EM Program for Compliance Monitoring in the Gulf of Alaska Pelagic Trawl Pollock Fishery** as the highest priority project for funding in the Alaska region. The Council took final action approving a regulated Trawl EM Program at our October 2022 meeting with the understanding that this timeline allowed for a regulated program to be implemented in January 2024 and thus, external funding would no longer be necessary. We have since been informed by NMFS that the earliest possible rulemaking for a regulated trawl EM program will now be January 2025, so fee revenue cannot be used for the 2024 fishery. This proposal thus requests the funding required to continue to operate the program under the Exempted Fishing Permit, which has been extended through December 31, 2024. The fishery monitoring data generated from this project are already being incorporated into the NMFS catch accounting database and are used for management; actively improving salmon bycatch accounting, reducing monitoring costs, and improving the overall quality of monitoring data. Continued NFWF support for this project will ensure that the Alaska trawl EM program will continue to operate uninterrupted until regulatory implementation.

In addition to the Trawl EM Program, in 2021 and 2022 NFWF provided support for multiple proposals for Alaska fisheries, which the Council greatly appreciates. 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 2022. The Council supports the following proposals in no particular relative priority:

The Council supports a **proposal submitted by Real Time Data for real time electronic logbook data collection and reporting in Alaska's groundfish and halibut fisheries.** The Real Time Data project will expand upon a project funded in 2022, testing electronic logbooks in the GOA fixed gear halibut and sablefish fleet. The second year of the project would increase vessel participation, expand into other gear groups including trawl, and begin to address logistical questions more in-depth, such as how to integrate data into the catch accounting system.

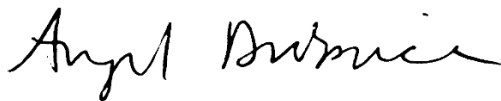
The Council supports a **proposal submitted by Saltwater Inc, Enhancing Observer Efficiency in Alaska Processing Plants through Electronic Monitoring.** This project will test if EM can be used to monitor the sorting line for salmon in shoreside processing plants. The intent is to use observers more efficiently and free up observer time for biological sampling without increasing the number of observers required at the plant. This project will also include testing different electronic tools to increase efficiency in that biological data collection.

The Council supports a **proposal submitted by North Pacific Fisheries Association, to evaluate and test alternative catch handling protocols for single pot gear in the fixed gear EM program** in order to identify strategies to improve overall program efficiency while still providing necessary data.

The Council supports a **proposal submitted by Alaska Groundfish Databank, Testing Electronic Monitoring on Trawl Catcher Vessels Participating in the Central Gulf of Alaska (CGOA) Rockfish Program: Pilot Phase 2.** This project expands upon 2023 efforts to test the use of cameras to review catch for both pelagic and non-pelagic trawl gear and develop vessel monitoring plans that demonstrate successful catch handling procedures. Pilot Phase II will also begin investigating shoreside components including utilizing cameras for salmon sorting compliance and observers in processing plants collecting data that can be compared to at-sea observer data and fish ticket data for species composition as well as differences between data at the trip and haul level.

In sum, the Council recognizes the value of the proposals submitted by the Alaska regional stakeholders: for the expanded development and progress towards an implemented regulatory program for EM as a compliance tool in Bering Sea and Gulf of Alaska pelagic trawl fisheries focused towards meeting the Council's goal of reducing costs and improving data quality; to use EM to enhance shoreside observer efficiency in processing plants; to test EM in the CGOA rockfish fishery to develop the next logical step in expanding the use of EM in Alaska trawl fisheries; and develop electronic logbook technologies and catch handling strategies that will improve efficiency and quality of data collection in Alaska's fixed gear fisheries. I hope that you will consider the proposals submitted from these stakeholders favorably and that this letter can be distributed to reviewers. The Council is ready to invest our resources to ongoing oversight and coordination that will facilitate successful execution of all five projects.

Sincerely,



Angel Drobica
Chair