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2018
Electronic Monitoring (EM)
Vessel Monitoring Plan

This Vessel Monitoring Plan (VMP) describes how fishing operations on the vessel are conducted, including how gear is set, how catch is brought on board, and where catch is retained and discarded. It also describes how the EM system and associated equipment is configured to meet the data collection objectives and purpose of the EM program, including camera locations to cover all fishing activities, any sensors to detect fishing activities, and any special catch handling requirements to ensure the data collection objectives can be met. This VMP also includes methods to troubleshoot the EM system and instructions for ensuring the EM system is functioning properly. The data collection objectives and purpose are described in the Annual Deployment Plan (ADP). The current ADP can be found here: https://alaskafisheries.noaa.gov/fisheries/observer-program-reports. Briefly, the data collection goal of 2018 ADP for the EM selection pool is to collect data to account for retained and discarded catch for fixed-gear vessels.

This VMP must be approved annually by NMFS. Once the VMP is complete and you agree to comply with the components of the VMP, you must sign and submit the VMP to NMFS for approval.

You should meet with the EM service provider to develop this VMP. If you choose to purchase an EM system not provided by NMFS, it must meet the specifications described here: *http://alaskafisheries.noaa.gov*. If changes are needed to the VMP after approval, you should work with EM service provider to make those changes and sign and submit those changes to NMFS. Once submitted you may begin a fishing trip.

If you have repeat problems with EM system reliability or video quality or are unable to comply with the requirements in this VMP, NMFS may disapprove your VMP for the following calendar year and you may be removed from the EM pool the following calendar year.

NMFS Contacts

Submit VMP or make changes to VMP:
Jennifer Watson
Sustainable Fisheries
PO Box 21668
Juneau, AK 99802
jennifer.watson@noaa.gov
(907)586-7537

Enforcement Questions
Brent Pristas
NOAA Fisheries Enforcement
1211 Gibson Cove Road
Kodiak, AK 99615
brent.pristas@noaa.gov
(907) 486-3298

EM Selection Pool
Mike Vechter
Fisheries Monitoring & Analysis
222 West 7th Ave, Stop 7
Anchorage, AK 99513
mike.vechter@noaa.gov
(907)271-1696

VMP Contents

VMP Date and Version

VMP Submission Date:	
VMP version number:	

Vessel Summary

Vessel Name:		
ADFG Vessel permit:		
Home port:		
Primary landing port(s):		
Gear type(s) to be used: (check all that apply)	☐ Longline	☐ Pot
Using Exemption at §679.7(f)(4) (fishing IFQ in Multiple Areas)	☐ Yes	☐ No
Vessel Owner name:		
Address:		
Email:		
Phone number(s):		
Vessel Primary Point of Contact: (if different from owner)		
Address:		
Email:		
Phone number(s):		

EM System Overview

- Your vessel is equipped with an electronic monitoring system, consisting of cameras, GPS, gear sensors, user interface, and control center.
- The system will record GPS and pressure sensor data while powered.
- Video will be collected from rail (for longline vessels) and deck cameras during hauling and catch processing.
- On longline vessels, video will also be collected during gear setting to monitor compliance with seabird mitigation device regulations.
- More specific information about your EM system is provided in *Appendix A - Vessel Installation Details*.
- The regulatory requirements for EM systems can be found at §679.51(f).

Operator Responsibilities

Your vessel has been placed into the EM selection pool for the duration of 2018 and you must fully comply with the provisions of this VMP. The EM deployment model in 2018 will be Trip-selection. The Observer Declare and Deploy System (ODDS) will be used to randomly select trips for EM coverage at a 30% rate.

Prior to Trip

Work with EM service provider: Once your vessel has been selected to be in the EM pool, you must contact the EM service provider as soon as possible to make arrangements to have the EM systems installed on your vessel. You must make the vessel available for the installation of EM equipment by the EM service provider and provide access to the vessel's systems and reasonable assistance to the EM service provider.

Register the trip in ODDS: Vessel owner/operators must register each 2018 fishing trip in ODDS prior to the start of a fishing trip. You will need an ODDS Users ID and password and can register the trip on the web (http://odds.afsc.noaa.gov) or by calling the ODDS call center at: 1-855-747-6377.

Notification of using exemption at §679.7(f)(4) to fish IFQ Fishing in Multiple Areas in ODDS- If you plan to use EM to retain IFQ or CDQ halibut or IFQ or CDQ sablefish onboard in excess of the total amount of unharvested IFQ or CDQ, that is currently held by all IFQ or CDQ permit holders aboard in that vessel category and IFQ or CDQ regulatory area(s), you must notify NMFS in ODDS and you must follow all the requirements at §679.51(f)(6) and the section below.

When a trip is selected for coverage, you must comply with operator responsibilities listed below and in *Appendix B – Guide for Vessel Operators*.

Each Trip

- **Logbook:** Complete the NMFS, IPHC, or EM Effort Logbook noting the Trip Start/End: date, time, port etc.
- **Power:** Maintain uninterrupted electrical power to the EM unit while the vessel is underway.
- **Function Test:** Prior to leaving port, the vessel operator must turn the system on and conduct a system function test following the instructions provided in *Appendix B – Guide for Vessel Operators*. If the function test identifies a malfunction, the vessel operator must follow the guidance in the malfunction matrix and the troubleshooting guidelines listed in *Appendix B – Guide for Vessel Operators.*
  - ***Confirm Hard Drive Storage Space*:** The vessel operator must ensure that the system has adequate storage to record the entire trip.
- **Maintain Equipment:** Ensure EM system components are not tampered with, disabled, destroyed, or operated or maintained improperly unless directed to make changes by NMFS, the EM service provider, or as directed in the troubleshooting guide of the VMP.

Each Day

- **Logbook:** You must complete one of the following:
  - If you **are** required to complete a NMFS or IPHC logbook then you can provide a copy of that logbook and add in the comments section the ODDS trip number, whether the vessel fished at night during the trip, and if there were any EM malfunctions.
  - If you ***are not*** required to complete a NMFS or IPHC logbook then you must complete the EM Effort Logbook found in either *Appendix E – 2018 Longline EM Effort Logbook* or *Appendix F – 2018 Pot EM Effort Logbook.*

Each catch handling event (haul or set)

- **Prior to each catch handling event**, the vessel operator is required to:
  - Verify that all cameras are recording and all sensors and other required EM system components are functioning as instructed in *Appendix B – Guide for Vessel Operators.*
  - Check the monitor and verify that the camera views are consistent with the images provided in *Appendix A - Vessel Installation Details*.
  - Clean camera lenses to maintain video quality and ensure camera views remain unobstructed. Video quality will be reported in the vessel trip report by PSMFC.

- **Longline Catch Handling:**
    - The vessel operator is responsible for ensuring all catch is handled within view of the cameras as defined in the camera descriptions and deck diagram in *Appendix A - Vessel Installation Details*.
    - The vessel operator must ensure that all catch processing is complete from the previous set prior to hauling the next set.
    - **Seabirds**: The vessel operator is required to hold incidentally caught seabirds up to the camera for 2-3 seconds and ensure that certain key parts of the animal, such as the beak, are captured by the hauler view camera. **When displaying a seabird to the camera:**
        - Grasp by the outermost bend in wing, with wings out-stretched and show the bird to the hauler camera showing the ventral and dorsal sides;
        - For albatross, show a profile of the bill by holding the bird by the neck against the side of the boat. Ensure that the view is not obstructed; and
        - If possible, hold the bird beak near a scaled reference item (e.g., measurement board with large grid) to assist with identification.
    - **Marine Mammal Depredation:** Note in the comments section of the logbook each set that marine mammals were observed feeding on the catch as it was brought aboard.
- **Pot Catch Handling:**
    - On retrieval of a pot, the crew must ensure that ALL catch is emptied from the pot onto the sorting table. Any fish left in the pot or fish that land on the deck when the pot is emptied must be placed on the sorting table.
    - Crew must process all retained catch and leave discards on the sorting table until after the retained catch are placed in the fish hold.
    - If there is no sorting table, all catch must be sorted in view of the cameras and discards left on deck in view of camera after retained fish are placed in the fish hold.
    - Crew must completely clear all catch, especially Pacific cod, off the table and deck before the next pot is dumped (so that catch from 2 pots is not mixed).
        - If the entire table is covered with catch, then Pacific cod should be cleared from the table a few at a time (to allow EM reviewer to count the retained catch).
        - If all of the snails and sea urchins cannot be not cleared off the table or deck before the next pot is dumped, they should be cleared by the next pot or as soon as feasible.
        - *Vessel owners may propose alternatives to this procedure by submitting plans that allow all catch to be accounted using the EM system to NMFS for approval. Vessels may not use this alternative until approved by NMFS.*
    - The vessel operator is responsible for ensuring all catch is handled within view of the cameras as defined in the camera descriptions and deck diagram in *Appendix A - Vessel Installation Details*.

Trip End

- **Within 2 business days after each EM selected trip, ensure that the hard drive is mailed** to the contact provided in *Appendix C – EM Program Contacts*.
- **If an EM selected trip ends at a tender, the hard drive must mailed within 2 business days of tender's arrival in a port with regular postal service** to the contact provided in *Appendix C – EM Program Contacts*.
- **If the fishing trip ends in a remote port with limited postal service,** the vessel operator should notify NMFS using the contacts on first page of the VMP, if possible, to inform of the expected delay.
- Along with the hard drive, submit a copy of the trip's **Logbook** (IPHC or NMFS logbook or EM effort logbook, as appropriate) and the ODDS trip number to the contact provided in *Appendix C – EM Program Contacts*.

- **Prior to logging another trip or within 2 weeks of the end of the fishing trip selected for EM coverage,** you must close the fishing trip in ODDS. You will need an ODDS Users ID and password and can close the trip on the web (http://odds.afsc.noaa.gov) or by calling the ODDS call center at: 1-855-747-6377.
- **Trips ending at a tender.** If your trip ends at a tender you must 1) manually turn on the EM system and trigger recording during the offload to allow the EM reviewer to verify the end of the trip, and 2) record the location of the offload in your logbook.

Vessels using the Exemption at §679.7(f)(4) to Fishing IFQ in Multiple Areas

- The vessel operator is still responsible for meeting all the requirements for use of an EM system on every trip when fishing using the exemption at §679.7(f)(4) to fishing IFQ in multiple areas.
- The EM system must be powered continuously during the fishing trip. If the EM system is powered down during periods of non-fishing, you must describe alternate methods to ensure location information about the vessel is available for the entire fishing trip in *Appendix A - Vessel Installation Details*.
- If an EM system malfunction identified as "high" priority in the malfunction matrix occurs during a fishing trip, the vessel operator must cease fishing immediately, follow the troubleshooting guidelines listed in *Appendix B – Guide for Vessel Operators*, and contact NOAA OLE immediately.
- The vessel operator may choose to purchase additional equipment, such as cameras or control centers, at their own expense to reduce lost fishing time. This additional equipment and its purpose should be described in *Appendix A - Vessel Installation Details*.
- The vessel operator may also describe alternate methods, such as VMS, to ensure location information about the vessel is available for the entire fishing trip in *Appendix A - Vessel Installation Details*.
- If a "high" priority malfunction occurs, every effort should be made to contact OLE while at sea, but if the vessel operator is unable to contact OLE while at sea, the vessel operator is not required to abandon fishing gear. The vessel operator should also contact the EM service provider to facilitate the repair.
- The vessel operator may contact OLE using a cell phone or satellite phone, or may contact the U.S. Coast Guard via VHF or single side band radio to request the Coast Guard contact OLE.
- The vessel operator must not set additional gear once a "high" priority malfunction is detected and must return to port immediately if unable to contact OLE at sea.

Enforcement Contacts

Juneau (907) 586-7225	**Anchorage** (907) 271-1823	**Dutch Harbor** (907) 581-2061
Kodiak (907) 486-3298	**Homer** (907) 235-2337	**Ketchikan** (907) 247-5804
Petersburg (907) 772-2285	**Seward** (907) 224-5348	**Sitka** (907) 747-6940
Between the Hours of 6 am and midnight you may also call (907) 586-7202 #1		

Equipment Malfunctions

Equipment Malfunction Discovered During Pre-Departure EM System Function Test

If the function test identifies a malfunction, the vessel operator must follow the troubleshooting guidelines listed in *Appendix B – Guide for Vessel Operators*.

Malfunction Type	High/Low Priority	Potential Solution	Action if Malfunction Not Resolved
Monitor	***High***	Connect a different monitor	Vessel operator must remain in port up to 72 hours to allow for repairs. After 72 hours, vessel operator may depart on trip and next trip whether logged in ODDs or not is selected for EM coverage. Repair must occur prior to departing on the next trip.
GPS	***High***	Restart system	Vessel operator must remain in port up to 72 hours to allow for repairs. After 72 hours, vessel operator may depart on trip and next trip whether logged in ODDs or not is selected for EM coverage. Repair must occur prior to departing on the next trip.
Insufficient Storage	***High***	Replace with spare data drive[1]	Vessel operator must remain in port up to 72 hours to allow for repairs. After 72 hours, vessel operator may depart on trip and next trip whether logged in ODDs or not is selected for EM coverage. Repair must occur prior to departing on the next trip.
Control Center	***High***	Restart system	Vessel operator must remain in port up to 72 hours to allow for repairs. After 72 hours, vessel operator may depart on trip and next trip whether logged in ODDs or not is selected for EM coverage. Repair must occur prior to departing on the next trip.
Insufficient Lighting	***High***	Replace lights	Vessel may fish but cannot retrieve gear at night.
Hauling Camera(s)	***High***	Restart system; replace with spare camera[1]	Vessel operator must remain in port up to 72 hours to allow for repairs. After 72 hours, vessel operator may depart on trip and next trip whether logged in ODDs or not is selected for EM coverage. Repair must occur prior to departing on the next trip.
Discard Camera(s)	***High***	Restart system; replace with spare camera[1]	Vessel operator must remain in port up to 72 hours to allow for repairs. After 72 hours, vessel operator may depart on trip and next trip whether logged in ODDs or not is selected for EM coverage. Repair must occur prior to departing on the next trip.
Streamer line Camera	Low	Restart system; replace with spare camera[1]	Vessel operator may depart on trip. Before departing on another trip selected for EM coverage, must contact EM service provider to schedule repair.
Rotation Sensor	Low	Carry spare rotation equipment[1]	Vessel operator may depart on trip, but must trigger video manually. Before departing on another trip selected for EM coverage, must contact EM service provider to schedule repair.
Hydraulic Sensor	Low	Restart system.	Vessel operator may depart on trip, but must trigger video manually. Before departing on another trip selected for EM coverage, must contact EM service provider to schedule repair.
Keyboard/Mouse	Low	Replace with another keyboard/mouse[1]	Vessel operator may continue fishing provided that the sensors are properly triggering automatic recording. Before departing on another trip selected for EM coverage, must contact EM service provider to schedule repair.

[1] Vessels may choose to purchase additional spare parts, such as cameras or sensors but these items will not be provided by NMFS

Equipment Malfunction at Sea

- If the system passed the function test prior to leaving port, and remains continuously powered during the trip, the vessel operator is NOT required to return to port in the event of a breakdown. Follow the instructions provided in *Appendix B – Guide for Vessel Operators*.
- If the malfunction cannot be resolved following the troubleshooting guide and/or with remote support, the vessel operator should continue to run the system with all functional parts, and must contact the service provider immediately (from sea if possible) to assist with scheduling service at the time of landing.

Malfunction Type	High/Low Priority	Potential Solution	Action if Malfunction Not Resolved
Monitor	***High***	Connect a different monitor	Vessel operator must attempt to repair prior to retrieving gear. If cannot repair must contact EM service provider at end of trip. Repair must occur prior to departing on the next EM selected trip.
GPS	***High***	Restart system	Vessel operator must attempt to troubleshoot issue prior to retrieving gear. If cannot repair must contact EM service provider at end of trip. Repair must occur prior to departing on the next EM selected trip.
Insufficient Storage	***High***	Replace with spare data drive	Perform a data retrieval and swap data drive with a new blank data drive. If cannot repair must contact EM service provider at end of trip. Repair must occur prior to departing on the next EM selected trip.
Control Center	***High***	Restart system	Vessel operator must attempt to repair prior to retrieving gear. If cannot repair must contact EM service provider at end of trip. Repair must occur prior to departing on the next EM selected trip.
Insufficient Lighting	***High***	Replace lights	Vessel may fish but cannot retrieve gear at night.
Hauling Camera(s)	***High***	Restart system; replace with spare camera[2]	Vessel operator must attempt to repair prior to retrieving gear. If cannot repair must contact EM service provider at end of trip. Repair must occur prior to departing on the next trip.
Deck/Discard Camera(s)	***High***	Restart system; replace with spare camera[2]	Vessel operator must attempt to repair prior to retrieving gear. If cannot repair must contact EM service provider at end of trip. Repair must occur prior to departing on the next EM selected trip.
Streamer line Camera	Low	Restart system; replace with spare camera[2]	Vessel operator may continue on trip. Before departing on another trip selected for EM coverage, must contact EM service provider to schedule repair.
Rotation Sensor	Low	Carry spare rotation equipment.[2]	Vessel operator may continue trip, but must trigger video manually. Before departing on another trip selected for EM coverage, must contact EM service provider to schedule repair.
Keyboard/Mouse	Low	Replace with another keyboard/mouse[2]	Vessel operator may continue fishing provided sensors are triggering automatic recording properly. Before departing on another trip selected for EM coverage, must contact EM service provider to schedule repair.
Hydraulic Sensor	Low	Restart system	Vessel operator may continue trip, but must trigger video manually. Before departing on another trip selected for EM coverage, must contact EM service provider to schedule repair.

[2] Vessels may choose to purchase additional spare parts, such as cameras or sensors but these items will not be provided by NMFS

Equipment Malfunctions for Vessels Fishing IFQ in Multiple Areas using the Exemption at §679.7(f)(4)

For any malfunction identified as "High" priority, the vessel operator must cease fishing immediately, follow the troubleshooting guidelines listed in *Appendix B – Guide for Vessel Operators*, and contact NOAA OLE immediately.

Malfunction Type	High/Low Priority	Potential Solution	Action if Malfunction Not Resolved
Continuous Power to System	***High***	Check power supply to system	Vessel operator must ceasing fishing and contact OLE or vessel operator may not embark on trip using exemption. If system powered down during non-fishing, VMP must describe alternative methods to record location information
Monitor	***High***	Connect a different monitor[3]	Vessel must cease fishing and contact OLE or vessel operator may not embark on trip using exemption.
GPS	***High***	Restart system	Vessel must cease fishing and contact OLE or vessel operator may not embark on trip using exemption unless vessel has operating VMS and hauling and discard cameras are functioning.
Insufficient Storage	***High***	Conduct data retrieval and replace with spare data drive	If vessel does not have a spare data drive, Vessel must cease fishing and contact OLE or vessel operator may not embark on trip using exemption.
Control Center	***High***	Restart system	Vessel must cease fishing and contact OLE or vessel operator may not embark on trip using exemption.
Insufficient Lighting	***High***	Replace lights	Vessel may fish but cannot retrieve gear at night
Hauling Camera(s)	***High***	Restart system; replace with spare camera[3]	Vessel must cease fishing and contact OLE or vessel operator may not embark on trip using exemption.
Deck/Discard Camera(s)	***High***	Restart system; replace with spare camera[3]	Vessel must cease fishing and contact OLE or vessel operator may not embark on trip using exemption.
Streamer line Camera	Low	Restart system; replace with spare camera[3]	Vessel operator may depart on trip or continue trip. Before departing on another trip selected for EM coverage, must contact EM service provider to schedule repair.
Rotation Sensor	Low	Restart system. Carry spare sensor[3]	Vessel operator may depart on trip or continue trip, but must trigger video manually. Before departing on another trip selected for EM coverage, must contact EM service provider to schedule repair.
Hydraulic Sensor	Low	Restart system. Carry spare sensor[3]	Vessel operator may depart on trip or continue trip, but must trigger video manually. Must contact EM service provider to schedule repair before departing on another trip where EM is required.
Keyboard/Mouse	Low	Replace with another keyboard/mouse[3]	Vessel operator may continue fishing provided sensors are triggering automatic recording properly. Before departing on another trip selected for EM coverage, must contact EM service provider to schedule repair.

[3] Vessel owners may choose to purchase additional spare parts, such as cameras or sensors but these items will not be provided by NMFS

Appendix A – Vessel Installation Details

[To be completed by the EM service provider]

- *Include a description and diagram of the installation on the vessel including the number and location of cameras and define their use (rail, deck, streamer line, sorting table, etc.)*
- *Provide images of camera views*
- *Describe the location of lighting, control center, GPS, sensors, monitor, and other EM equipment.*
- *List the frame rates, image resolution, frequency of logging, sensor trigger threshold values, and other EM system specifications.]*
- *Describe additional equipment and its purpose to allow a vessel to continue fishing IFQ in multiple areas using the exemption at §679.7(f)(4).*

Appendix B – Guide for Vessel Operator

[To be completed by the EM service provider.]

EM system user's guide

[Provide EM system specific information including…

- *Describe how to retrieve a hard drive, how to power up the system, how to do a function test, system, etc.*
- *Provide the detained steps that will be taken to minimize the potential for EM system malfunctions and the troubleshooting steps if malfunctions occur]*

Vessel-specific handling protocols or instructions

[List any special handling protocols that may apply to a particular vessel – including description and diagrams of discard control points (if applicable), specific procedures for sorting discards, steps that need to be taken to ensure all catch remains in camera view]

Appendix C – EM Program contacts (who to call)

[To be completed by the EM service provider. List EM service provider contact information, including but not limited to: office address, office phone numbers, and Field Manager email and cell phone.]

Appendix D – Signature Page

This certifies that the vessel owner/operators has been trained in the function and operation of the Electronic Monitoring (EM) system installed on the vessel and that the vessel owner/operator must comply with the components of this Vessel Monitoring Plan. A signed copy of this VMP must be aboard at all times when the vessel is directed fishing in a fishery subject to EM coverage. Digital signatures are acceptable.

Vessel owner/operator signature: _____

Date: _____

EM Service Provider signature: _____

Date: _____

NMFS Representative Signature: _____

Date: _____

Appendix E – 2018 Longline EM Effort Logbook

Vessel Name:		Start Port:
ADF&G Number:	Trip Start Date (mm/dd):	Offload Port:
Operator Name:	Offload Date (mm/dd):	ODDS Trip Number:

Did you haul at night? Y N
Did the EM system function normally the entire trip? Y N
If no, please describe any problems:

Gear ID	Gear Type	Length of Skate (Feet)	Hook Size	Hook Spacing (ft)	No. Hooks Per Skate
A					
B					
C					
D					

Set		Haulback		Seabirds Caught?	Did you discard legal-sized halibut?	Gear ID	No. Skates Set	No. Skates Lost
Date (mm/dd)	Start Time	Date (mm/dd)	Start Time					
				Y N	Y N			
				Y N	Y N			
				Y N	Y N			
				Y N	Y N			
				Y N	Y N			
				Y N	Y N			
				Y N	Y N			
				Y N	Y N			
				Y N	Y N			
				Y N	Y N			

Appendix F – 2018 Pot EM Effort Logbook

Vessel Name:		Start Port:
ADF&G Number:	Trip Start Date (mm/dd):	Offload Port:
Operator Name:	Offload Date (mm/dd):	ODDS Trip Number:
Did you set pots at night? Y N	Did you retrieve pots at night? Y N	How much gear did you fish? (e.g.60 pots)

Did the EM system function normally the entire trip? Y N If no, please describe any problems:	**Other Trip Comments:**

Set		**Retrieval**		**# of Pots Set**	**# of Pots Retrieved**
Date (mm/dd)	**Start Time**	**Date (mm/dd)**	**Start Time**		

PUBLIC REPORTING BURDEN STATEMENT

Public reporting burden for this collection of information is estimated to average 48 hours per response, including the time for reviewing the instructions, searching the existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to Assistant Regional Administrator, Sustainable Fisheries Division, NOAA National Marine Fisheries Service, P.O. Box 21668, Juneau, AK 99802-1668.

ADDITIONAL INFORMATION

Before completing this form, please note the following: 1) Notwithstanding any other provision of law, no person is required to respond to, nor shall any person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the Paperwork Reduction Act, unless that collection of information displays a currently valid Office of Management and Budget control number; 2) This information is required to manage commercial fishing efforts under 50 CFR part 679 and under section 402(a) of the Magnuson-Stevens Act (16 U.S.C. 1801, et seq.) as amended by Public Law 109-479; 3) Responses to this information request are confidential under section 402(b) of the Magnuson-Stevens Act. They are also confidential under NOAA Administrative Order 216-100, which sets forth procedures to protect confidentiality of fishery statistics.