

# Omnibus IFM Amendment

## *Options for IFM in the Atlantic Herring Fishery*

*Coverage Targets, Program Requirements, Sea Day Costs*

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# Background

- IFM Amendment includes options to implement IFM programs in the Atlantic herring and mackerel fisheries
- January 2015 Draft EA includes options for industry-funded observer coverage (HER OBS) – estimated \$806 sea day cost

## **January 2015 NE Council motion:**

*Include options that require third-party at-sea monitoring to document all fish not retained on board the vessel for any reason...options include portside sampling and EM, to be phased-in through framework adjustment.*



# Herring ASM Options

- Intent is to develop options that may reduce sea day costs (industry) while meeting monitoring needs
- Provides opportunity to better understand sea day costs/cost drivers
- Provides more complete range of IFM options and better basis for comparing options and impacts
- Herring ASM developed based on Groundfish ASM program provisions, but not the same program
- Long-term strategy to incorporate portside sampling/EM (with adjustments to HER ASM coverage)



# Summary of Herring IFM Options

## ***Industry-Funded Observer Coverage (HER OBS) Options***

- Industry pays sea day costs for observer coverage above SBRM
- Comprehensive catch/bycatch data collection
- Estimated \$806 sea day cost

## ***Industry-Funded At-Sea Monitoring (HER ASM) Options***

- Industry pays sea day costs for at-sea monitoring to collect bycatch (discard) information (in addition to observers deployed to under SBRM)
- Coupled with portside sampling/EM for comprehensive catch sampling
- Streamlined training/equipment and other related provisions intended to reduce sea day cost



# Summary of Herring IFM Options

- **Herring OBS Options** include 100% observer coverage for all Category A/B vessels and other options that apply only to midwater trawl vessels
- **Herring ASM Options** include 100%, 75%, 50% ASM for all Category A/B vessels (on trips without SBRM observers)
- Sub-options for waivers and exemptions for wing vessels that do not carry fish
- *See Table 1 on p. 3 of Draft Discussion Document*



# Summary of Herring IFM Options

Questions?



# Presentation/Document Overview

- What is a sea day cost? What drives costs up?
- How can sea day costs be reduced?
- *Sampling Objectives, Design, Data Collected*
- *Service Provider Requirements*
- *Observer Training/Certification, Equipment*
- *Trip Notification, Debriefing, Data Management*
- Comparison of Herring IFM Options
- How can sea day costs for the herring ASM options be estimated?





# What is a Sea Day Cost?

The cost that the fishing industry (vessels/owners) pay (per day) to service provider companies for deploying observers/monitors under an IFM program

- Based on division of cost responsibilities in IFM amendment
- Labor, insurance, training, employee benefits, overhead
- Will be negotiated through private contracts between industry and service providers under IFM program
- Can be generally estimated but cannot be predicted with certainty





# What Drives Sea Day Costs Up?

## Biggest Sea Day Cost Drivers (Section 2.1, p. 5)

1. Requirements for New Data Collection/New Sampling Equipment
2. SCA and FLSA Requirements (wage, overtime, employee benefits)
3. Ability to Predict the Fishery (number and length of trips, vessels, ports, seasonality, patterns)
4. Complicated Logistics (requirements for vessel selection, observer deployment)



# How to Reduce Sea Day Costs

*Table 2, pp. 8-10*

*Address these issues to the extent possible when developing the Herring ASM options*

- Build from existing sampling protocols; do not require new/different data to be collected
- Eliminate SCA and related regulatory requirements for Federal contracts
- “Grandfather in” current service providers approved for NEFOP and GF ASM programs for HER ASM
- Allow cross-certification of NEFOP and GF ASM observers for HER ASM; combine and overlap training and recertification whenever possible



# How to Reduce Sea Day Costs

*Table 2, pp. 8-10*

*Address these issues to the extent possible when developing the Herring ASM options*

- Provide detailed information about fishing patterns and affected vessels
- Minimize observer deployment logistics
- Allow/encourage industry to negotiate less significant costs with providers
- Encourage industry/providers to negotiate billing by partial days versus 24-hour days (scallop regulations)
- Allow observers to be deployed on the same vessel for back-to-back and multiple multi-day trips per month



# How to Reduce Sea Day Costs

*Table 2, pp. 8-10*

*Address these issues to the extent possible when developing the Herring ASM options*

- Encourage vessels in close proximity to negotiate contracts together so they can utilize the same pool of observers and minimize travel expenses
- Streamline debriefing and re-certification requirements
- *Address/streamline insurance requirements?*
- *Combine the IFM programs for the herring and mackerel fisheries?*



# How to Reduce Sea Day Costs

Questions?

*Additional Committee Discussion?*



# Elements of Herring ASM Options

- Section 3.0, p. 12 – HER ASM options developed based on GF ASM program
- Elements of HER OBS options and GF ASM included in document for comparison purposes
- *Sampling Objectives, Design, Data Collected (Section 3.1)*
- *Service Provider Requirements (Section 3.2)*
- *Observer Training/Certification, Equipment (Section 3.3)*
- *Trip Notification, Debriefing, Data Management (Section 3.4)*
- Comparison of Herring IFM (OBS vs.ASM) Options (Section 3.5)

# Sampling Objectives, Design, Data Collected

- **HER OBS:** comprehensive catch data (catch, bycatch) and other data consistent with NEFOP observer protocols
- **HER ASM:** documentation of bycatch data consistent with NEFOP protocols (discard log)
- HER ASM options developed with intent to mirror training/equipment requirements for bycatch documentation in GF ASM (no biological sampling)
- Observer Committee should confirm/clarify monitoring objectives for HER ASM (Table 6, p. 17)





# Sampling Objectives, Design, Data Collected

	Industry-Funded Observer Coverage Options (OBS)	NE GROUNDFISH ASM PROGRAM	Industry-Funded Herring ASM Options (Herring ASM)
<b>Sampling Objectives</b>	SBRM, MMPA, MSA, ESA Stock Assessment, Discard Estimation	MSA Catch monitoring; discard estimation	<i>Bycatch documentation</i> - catch that is not kept/landed on Herring Category A/B herring vessels, including full and partial slippage events and operational discards; also including catch that may be brought aboard, sorted, and then discarded <i>Elements of data collection based on GF ASM; Herring ASM program is intended to complement portside sampling/EM for comprehensive catch monitoring program (landings + discards)</i>
<b>Sampling Design</b>	Comprehensive catch and bycatch data collection program; protected species documentation; biological sampling; environmental parameters; economic information	Catch monitoring to ensure that ACLs are not exceeded; data on catch composition to estimate total discards by sectors and common pool vessels, by gear type and stock area	Sampling protocols based on NEFOP Haul Log ("modified" - discards); Discard Log; Documentation of bycatch (discards); Protected species interactions; <i>(in addition to pre-trip safety checklist and other logs/reports as determined by NEFOP)</i>
<b>Data Collected</b>	Comprehensive catch/bycatch catch/bycatch; biological samples; protected species; fishery information; environmental parameters	Catch/Bycatch	Catch not brought on board the vessel for any reason; Slippage events; Operational discards; Discards brought on board <i>No subsampling for kept catch estimation</i>

# Sampling Objectives, Design, Data Collected

Questions?

*Additional Committee Discussion*

*Table 6, p. 17*



# Service Provider Requirements

- HER ASM service provider requirements based on GF ASM requirements (see Appendix I for details)
- No requirement for a college degree under HER ASM options
- No prohibition on back-to-back or multiple multi-day trips under HER ASM options
- Approved service providers for GF ASM grandfathered in as approved providers for HER ASM
- No regulatory requirements associated with SCA under any IFM options



# Service Provider Requirements

	Industry-Funded Observer Coverage Options (HER OBS)	<i>NE GROUND FISH ASM PROGRAM</i>	Industry-Funded Herring ASM Options (HER ASM)
<b>Service Provider Requirements</b>	<i>Implemented through SBRM Amendment</i>	<i>Implemented through Am 16 Multispecies FMP</i>	<i>Same as Groundfish ASM Program</i>
	CFR 648.11( h) Observer Service Provider Approval/Responsibilities	CFR 648.47(b)(4) and (b)(5)	<i>No requirement for providers to meet SCA/FLSA/DOL wage/overtime standards</i>
	Bachelor's Degree required	High School Diploma or equivalency	<i>High School Diploma or equivalency</i>
		<i>No prohibition on observer deployment on back-to-back trips or multiple multi-day trips</i>	<i>No prohibition on observer deployment on back-to-back trips or multiple multi-day trips</i>
<b>Current NMFS-Approved Providers</b>	MRAG Americas	MRAG Americas East West Technical Services AIS, Inc. ACD USA Ltd.* Fathom Research, LLC*	MRAG Americas East West Technical Services AIS, Inc. ACD USA Ltd.* Fathom Research, LLC*

# Service Provider Requirements

Questions?

*Additional Committee Discussion?*



# Observer Training, Certification, Equipment

- Cross-certification allowed and encouraged – Observer training (and equipment) for NEFOP observer coverage and/or GF ASM programs would apply to HER ASM certification
- Training trips for HER ASM not required for existing observers (OBS or GF ASM)
- Should significantly reduce training and equipment costs for existing GF ASM providers
- Focus on discard data only under HER ASM options will reduce training and equipment costs for new service providers/observers

# Observer Training, Certification, Equipment

- **NEFOP OBS-certified observers** – no additional training days for HER ASM certification
- **Current GF ASM-certified observers** – 1-2 additional training days for HER ASM (vs. 11 days for GF ASM, *estimated \$3,000-\$4,000 per observer*)
- **HER ASM only observers** – 4-5 training days to certify for HER ASM (vs. 11 days for GF ASM)
- Annual recertification required, but likely 1 day (vs. 3 days for GF ASM, *i.e., 2/3 cost reduction*)





# Observer Training, Certification

	Industry-Funded Observer Coverage Options (OBS)	NE GROUND FISH ASM PROGRAM	Industry-Funded Herring ASM Options (Herring ASM)
Training and Certification			<b>NEFOP-Certified Observers with Current High-Volume Certification</b> - no extra training days, but possibly some instruction on protocols for ASM trips; <b>GF ASM-Certified Observers</b> - 1-2 training days for herring/high-volume; <b>New HER ASM Observers</b> - 4-5 training days for HER ASM only certification (2 days safety, plus herring/high-volume training);  <i>Providers pay for travel/lodging, and daily pay to observers for attending training;</i> <i>Est. provider cost for Gfish ASM training (11 days) - \$3000-\$4000 per observer (\$325/day)</i>
Training Courses	<b>15 days (3 working weeks)</b> comprehensive training, plus high-volume certification for qualified observers (one extra day); <b>Current Groundfish ASM-certified Observers</b> - can certify for OBS with additional training days and high-volume certification	<b>11 days</b> (covers multiple gear types - gillnet, longline, otter trawl, handline - catch estimation procedures, protected species)	
Certification/Shadow Trips	Yes, 4 trips incl. 1 with trainer	Yes, 4 trips incl. 1 with trainer	Not required for existing NEFOP and GF ASM-certified observers (already certified); New HER ASM only observers - one shadow trip with trainer; first four trips would be training trips
Re-certification	No	Yes, Annual	Yes, annual - one day (Gfish ASM - 3 days; cost reduced by 2/3)
Safety Refresher (two days)	Yes, every 18 months	Yes, every 18 months	Yes; cross-certify; additional cost only for HER ASM-only observers
CPR/First Aid Certification	Annual	Annual	Annual; cross-certify; additional cost only for HER ASM-only observers

# Sampling Equipment (p. 25-26)

	Industry-Funded Observer Coverage Options (Herring OBS)	NE GROUND FISH ASM PROGRAM	Industry-Funded Herring ASM Options (Herring ASM)
<b>Equipment</b>	Comprehensive - 83 items	Limited - 44 items	Limited - Similar to Groundfish ASM; any equipment necessary for discard sampling/documentation
<i>Personal Safety Equipment- Immersion suit, PLB, Inflatable Vest</i>	Yes	Yes, covered by provider	Yes, covered by provider; Equipment for NEFOP and GFASM can be used; Additional cost only for HER ASM-only observers
<i>Personal Issue and Off-the-Shelf Gear</i>	<i>(baskets, small scales, gloves, bags, measuring tapes, disposable cameras, knives, clipboards)</i>	Yes, covered by provider	Yes, covered by provider; Est. total cost for new observer (\$2,600 amortized for life of equipment); Est. sea day cost (service provider) per observer (150 days) - \$17.50
<i>Special Prints, Electronics, Not Off-the-Shelf Gear</i>	<i>(manuals, guides, Marel scales, tablets, logs, electronics)</i>	Yes, covered by NMFS	Yes, covered by NMFS; <i>future funding unknown</i>



# Observer Training, Certification, Sampling Equipment

Questions?

*Additional Committee Discussion?*



# Trip Notification, Debriefing, Data Management

- Trip notification for herring ASM options using current call-in for limited access herring vessels (simpler than Groundfish PTNS)
- Debriefing important for data quality, especially for discard logs – proposed to be consistent with GF ASM; encourage streamlined and remote debriefing
- Data management at NEFOP – same as observer data and GF ASM data



# Trip Notification, Debriefing, Data Management

	Industry-Funded Observer Coverage Options (HER OBS)	NE GROUND FISH ASM PROGRAM	Industry-Funded Herring ASM Options (HER ASM)
Logistics and Related Provisions	PTNS	Gfish PTNS	Build into existing pre-trip notification system for Herring A/B vessels (different from GFish) <i>No need to develop strategy for vessel selection under 100% coverage options (or possibly 50%)</i>
Debriefing	Yes	Yes	Yes; Pre-trip and post-trip briefing important for discard logs; <i>Streamline/combine debriefing to the extent possible</i>
Data Management	NEFSC/NEFOP	NEFSC/NEFOP	Data submitted to NEFOP for use by all users (NEFSC, GARFO, NEFMC) under a separate program code
	Upload OB PRELIM record 48 hours from landing	Upload OB PRELIM record 48 hours from landing	OBPRELIM upload - a) Delivery of paper log data shall be received within 5 calendar days (120 hours) of the vessel landing (b) Delivery of electronic data shall be received within 2 calendar days (48 hours) of the vessel landing
	Paper logs due 5-7 business days	Paper logs due 5-7 business days	Paper logs due 5-7 business days



# **Trip Notification, Debriefing, Data Management**

**Questions?**

*Additional Committee Discussion?*



# Comparison of Herring IFM Options

Observer Coverage Options (HER OBS)	Pros	Cons
	Comprehensive catch sampling (kept and discarded)	Higher sea day cost
	Biological samples collected	Limited ability to reduce industry/sea day costs
	More applications/uses for data (stock assessment, catch monitoring, etc.)	Industry-funded observer data not collected consistently with SBRM strata (gear type, area) not utilized for bycatch estimation and stock assessment
		Limited to only one service provider at onset of industry-fund program; higher costs for other providers to certify observers
At-Sea Monitoring Options (HER ASM)	Pros	Cons
	Reduces sea day costs for industry	Discard data only; more limited applications of data
	Builds on existing discard data collected by observers (provides basis for comparison to observer data)	Loss of opportunity to collect other important data while paying for an observer
	Focuses on at-sea component of comprehensive long-term catch monitoring program that will likely include portside sampling and EM	<i>*Unclear how ASM provisions interact/relate to portside sampling/EM components of program</i>
	Multiple service providers available at onset of industry-funded program; increases flexibility and negotiating ability for industry; competition reduces costs	
	Discard data collected by at-sea monitors can help to inform decisions about maximized retention provisions for the portside sampling/EM components of the IFM program	



# How to Estimate HER ASM Sea Day Costs?

- Current estimate of HER OBS options - \$806
- Current estimate of GF ASM program – **TBD**
- Work with IFM FMAT to identify cost savings under HER ASM when compared to GF ASM program (training, equipment, logistics, overhead)
- Estimate sea day cost for HER ASM options (range) based on comparison to GF ASM program costs
- Provide information about sea day costs for other IFM programs for comparison and additional perspective



# **Industry-Funded Monitoring Options for the Atlantic Herring Fishery (HER OBS and HER ASM)**

Questions?

*Additional Committee Discussion?*

