

## **4.0 DRAFT ALTERNATIVES UNDER CONSIDERATION**

### **4.1 Fishery Program Administration**

#### **4.1.1 Sector Administration Provisions**

The management measures proposed in this section relate to sector administration policies established in Amendment 13 and Amendment 16.

The alternatives for modifying the current sector administration provisions are described below. The following alternatives will consider changes to the administration of the groundfish at-sea monitoring program designed to improve the operation of the system. The goal is to reduce reporting redundancies, reduce the burden on sector managers for reconciling data, increase flexibility for sector participants with business planning, and improve timeliness of data processing. Additionally, there are alternatives to establish additional funding source options for the groundfish monitoring program.

##### **4.1.1.1 Sector Reporting Requirements**

###### **4.1.1.1.1 Option 1: No Action**

In Amendment 16, the Council required sectors to report all landings and discards by sector vessels to NMFS on a weekly basis. Additionally, Amendment 13 established the requirement that sectors submit annual year-end reports, and Amendment 16 expanded on those requirements. Current regulations require that approved sectors must submit an annual year-end report to NMFS and the Council, within 60 days of the end of the fishing year that summarizes the fishing activities of its members, including harvest levels of all species by sector vessels (landings and discards by gear type), enforcement actions, and other relevant information required to evaluate the performance of the sector. However, due to the time reconciliation takes, in the NMFS year-end report guidance the due date for the report is set as 14 days after the date final data tables are provided to the sectors by NMFS. The regulations require that the annual report must report the number of sector vessels that fished for regulated groundfish and the permit numbers of those vessels (except when this would violate protection of confidentiality), the number of vessels that fished for other species, the method used to estimate discards, the landing ports used by sector vessels while landing regulated groundfish, and any other information requested by the Regional Administrator. The annual report is intended to provide information necessary to evaluate the biological, economic, and social impacts of sectors and their fishing operations.

NMFS provides sectors with a guidance document detailing additional information required in the annual report, consistent with the regulatory authority, and specifications for submitting the report<sup>1</sup>. Sector annual year-end reports comprise two files: a MS Word file for descriptive information and a MS Excel file for table data.

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<sup>1</sup> Preparing the Northeast Multispecies Sector Annual Year-end Report, 2016, GARFO, <https://www.greateratlantic.fisheries.noaa.gov/sustainable/species/multispecies/sector/docs/fy2016/sectoryerguidefy2016rev70.pdf>

**Table 1– Contents of the Descriptive Information File**

<b>Section Name</b>	<b>Description</b>
Section 1: Fishing Effort Information	Fishing effort by sector vessels under sector rules
Section 2: Discard Estimation Method	A description of the method that was used and the sector’s experience of using the method
Section 3: Violation Reports	Detailed reports of violations and how they were handled
Section 4: Other Relevant Information	Biological, social, and economic impact of sectors

**Table 2- Summary of Year-End Report Tables**

<b>Table</b>	<b>Table Contents</b>
Table 1	Summary data by vessel
Table 2	Port landing data
Table 3	PSC and Initial ACE data
Table 4a	Groundfish Landings and ACE Transfer summary data
Table 4b	Groundfish Landings from Trawl Gear
Table 4c	Groundfish Landings from Gillnet Gear
Table 4d	Groundfish Landings from Hook Gear
Table 5a	Other Species Landings Data from Sector Trips
Table 5b	Other Species Landings Data from Non-Sector Trips
Table 6	ACE Transfers to other sectors
Table 7	ACE Transfers from other sectors
Table 8	ACE Redistribution within sector
Table 9	ACE Conversion GB Haddock East to GB Haddock West

The source data for these tables come from various inputs including but not limited to VTRs, dealer reports, VMS catch reports, and Permits; these source data have been processed for quality by NMFS.

Option 1/No Action would continue to require sectors to report all landings and discards to NMFS on a weekly basis, and would continue to require that sectors submit annual year-end reports to NMFS and the Council.

**4.1.1.1.2 Option 2: Streamline Sector Reporting Requirements**

This measure would take steps to streamline the weekly sector reporting process. For example, this could include eliminating the requirement for sectors to submit weekly and daily reports in lieu of the agency providing monitoring summaries for the sectors to use while continuing reconciliation to confirm accuracy. In Amendment 16, the Council required sectors to report all landings and discards by sector vessels to NMFS on a weekly basis. At the time this was developed, the expectation was that sectors would be using real-time information from their vessels to monitor catch. In practice, NMFS provides sector managers with a weekly download of trip data (dealer and VTR landings data, observer discard data, and calculated discard rates for unobserved trips), and sectors then use the weekly downloads to update their sector accounting and then submit a weekly report to NMFS. Data reconciliation occurs regularly between the sectors and NMFS to improve monitoring accuracy. However, a more efficient process might be developed that would still involve timely monitoring and reconciliation of data sources between sectors and NMFS.

In a letter from NMFS to the Council, NMFS staff identified several reporting measures as candidates for streamlining<sup>2</sup>. This measure may consider these steps to streamline the overall sector reporting process. Examples recommended in the letter include:

- Granting additional Regional Administrator authority to streamline sector reporting requirements. For example, NMFS lacks the authority to remove the current weekly reporting requirement if a more efficient method for timely monitoring of sector ACEs is developed.
- Using NMFS reconciled data to determine when the trigger for sector daily catch reporting has been reached (required when 90 percent of any ACE has been caught), rather than using sector self-reported data. As described above, sector data is not any timelier and the reconciled data is more accurate, so using NMFS reconciled data would be more efficient and reliable than relying solely on sector reports.
- Modifying trip end hauls to accommodate catch reporting and to eliminate redundancy.
- Evaluating and considering the requirements for sector year-end reports, in light of confidentiality protections.

*Rationale:* Streamlining the sector reporting process would reduce reporting redundancies, provide flexibility to sectors and sector managers, and improve timeliness of data processing.

#### 4.1.1.2 Knowing Total Monitoring Coverage Level at a Time Certain

##### 4.1.1.2.1 Option 1: No Action

Currently, NMFS publishes the total monitoring coverage level once the necessary analysis is completed. Typically, analysis to determine the at-sea monitoring (ASM) coverage level is available sooner than the Standardized Bycatch Reporting Methodology (SBRM) analysis used to determine the Northeast Fisheries Observer Program (NEFOP) coverage level. The timeline for when total monitoring coverage level information is available has varied throughout the years of the groundfish monitoring program ( ).

Current regulations set December 1 as the deadline for sectors to submit preliminary rosters, but give NMFS flexibility to set other dates. For example, in FY 2013, managers asked for a later date, and they

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<sup>2</sup> Letter from NMFS, “Bullard to NEFMC re sector reporting streamlining”, dated August 14, 2013 (see Attachment 1)

agreed on March 29, 2013. Beginning in FY 2014, NMFS established a standard deadline of four weeks after potential sector contribution (PSC) letters are sent out, although in several years, there have been agreed-upon extensions.

**Table 3 - Target and realized observer (NEFOP and ASM) coverage levels for the groundfish fishery and dates when analyses to determine coverage rates available for Fishing Years 2010-2017 (GARFO 2017). “n/a” indicates that the information is not available.**

Fishing Year	NEFOP target coverage level	ASM target coverage level	Total target coverage level	Realized coverage level	Date analysis posted by GARFO to determine total coverage rate	Date ASM coverage rate announced	Date sector rosters due
FY 2010	8 %	30 %	38 %	32 %			
FY 2011	8 %	30 %	38 %	27 %			12/1/2010
FY 2012	8 %	17 %	25 %	22 %			12/1/2011
FY 2013	8 %	14 %	22 %	20 %	4/12/2013	3/14/2013	3/29/2013
FY 2014	8 %	18 %	26 %	25.7%	2/21/2014	2/18/2014	3/6/2014
FY 2015	4 %	20 %	24 %	19.8%	3/2/2015	2/26/2015	2/25/2015
FY 2016	4 %	10 %	14 %	11.1%	5/6/2016	3/22/2016	3/15/2016
FY 2017	4 %	12 %	16 %	n/a*	3/15/2017	3/15/2017	3/16/2017
FY 2018	TBD	15%-NEFOP	15 %		1/25/2018	1/25/2018	3/26/2018

\*Realized coverage not available; fishing year still underway.

Source: Summary of analyses conducted to determine at-sea monitoring requirements for multispecies sectors, FY2018, GARFO; and personal communication with GARFO staff

#### 4.1.1.2.2 Option 2: Administrative Measure for Knowing Total Monitoring Coverage Level at a Time Certain

This measure would consider alternatives that facilitate knowing the target monitoring coverage level at a specific date in advance of the start of the fishing year to facilitate business planning by permit holders and sectors. Groundfish fishery participants need this information in advance of the fishing year in order to decide whether to participate in sectors for the upcoming year and to finalize their business planning. The feasibility of setting a fixed date is related to the method used for setting coverage rates and the desired timeliness of the underlying data used in the analysis.

Certain alternatives for determining target monitoring coverage levels may not require extensive analysis to determine target coverage levels for the upcoming fishing year. For example, alternatives for fixed target coverage levels would provide sectors a clear understanding of the target monitoring coverage level for upcoming years.

*Rationale:* Knowing the target monitoring coverage level at a specific date in advance of the start of the fishing year would provide flexibility to groundfish fishery participants by making the necessary information available for participants to decide whether to participate in sectors for the upcoming year and to finalize their business planning.

### 4.1.1.3 Funding for the Groundfish Monitoring Program

#### 4.1.1.3.1 Option 1: No Action

Beginning in 2012, Amendment 16 required that the at-sea monitoring program would be industry funded. Framework Adjustment (FW) 45 included a measure to remove the requirement for industry-funded at-sea monitoring for FY 2012 and maintain at-sea monitoring coverage of sector trips at the level that NMFS could fund during FY 2012. The rationale provided in FW 45 was that to date, NMFS had sufficient funding to provide an at-sea monitoring program to fulfill this requirement for sectors annually since FY 2010. The Council was concerned that imposing these costs on the industry in FY 2012 would reduce profitability and result in making the sector system an economic failure. However, NMFS disapproved this measure to delay the requirement for industry-funded at-sea monitoring because it had concerns that it did not meet the requirements of the FMP and the Magnuson-Stevens Act, as previously expressed in letters and at Council meetings. The justification was that relying on NMFS appropriations to determine an at-sea monitoring coverage rate does not ensure that coverage will be sufficient to monitor sector annual catch entitlements (ACEs) or to meet the purpose and goals for sector monitoring described in Amendment 16. A similar measure to delay the requirement for industry-funded at-sea monitoring in FY 2013 was included in FW 48, and again was disapproved by NMFS based on the same concerns.

#### 4.1.1.3.2 Option 2: Additional Options for Industry-Funded Costs of Monitoring

Under Amendment 16, sectors must develop and fund their own monitoring programs. Sectors are still expected to bear the costs of the monitoring program changes adopted in Amendment 23.<sup>3</sup>

##### *Funding source ideas*

The costs of additional monitoring can be considerable. This action will consider regulatory changes that will help offset the cost of monitoring for sectors. Ideas to offset monitoring costs include:

- Quota auctions and quota set-asides, where a portion of the ACL for key stocks could be auctioned off annually to fund monitoring. This is done in some Fishery Management Plans (FMPs), where a portion of the quota is reserved as a set-aside and auctioned off annually to provide additional catch opportunity and a source of funding for management priorities like research. Section 208 of the Magnuson-Stevens Act (MSA) established a Fisheries Conservation and Management Fund, which may be funded through quota set-asides, appropriations, states or other public sources, and private or nonprofit organizations. This fund may be used to expand the use of electronic monitoring.

This measure will establish the necessary infrastructure for a quota auction.<sup>4</sup>

<sup>3</sup>The Council recently adopted the IFM Amendment. The IFM Amendment discusses that the existing groundfish monitoring program is excluded from the newly adopted IFM approach. The PDT is aware that there are provisions in the IFM Amendment that will need to be considered for determining how the adjusted groundfish monitoring program in Amendment 23 fits into the IFM approach, and plans to explore this concept further. At present, the PDT does not expect that the IFM approach would apply to the adjusted groundfish monitoring program.

<sup>4</sup> The PDT is exploring potential limitations to setting up a quota auction for the groundfish sector program. One question is whether the Council can provide a quota auction system outside of Limited Access Privilege Programs

*Rationale:* Quota auctions may offset the cost of monitoring for sectors. This measure would consider regulatory changes to establish a quota auction.

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(LAPPs). Additionally, even if it is determined the Council can establish a quota auction system for the groundfish sector program, the funds collected would go into the Limited Access System Administration Fund established by section 305(h)(5)(B) of the MSA and would be subject to annual appropriations.

## 4.2 Commercial Fishery Measures

### 4.2.1 Groundfish Monitoring Program

Amendment 13 established the concept that sectors are responsible for monitoring sector catch, and Amendment 16 provided additional guidance and revisions to monitoring program requirements. Sectors are responsible for developing and implementing a monitoring program, described in their operations plans, that satisfies NMFS and Council requirements for monitoring catch and discards. Subsequent framework actions (FW 45, FW 48, and FW 55) made additional changes to the groundfish monitoring program.

The goals of the sector monitoring program were updated in Amendment 16 (NEFMC 2009). That document did not include an explicit listing of sector monitoring program goals and objectives, but various sections did identify reasons for sector monitoring programs. These include:

- Sector operations plans will specify how a sector will monitor its catch to assure that sector catch does not exceed the sector allocation.
- A dockside monitoring program will also be implemented in order to verify landings of a vessel at the time it is weighed by a dealer, to certify the landing weights are accurate as reported on the dealer report.
- The primary goal of observers or at-sea monitors for sector monitoring is to verify area fished, catch, and discards by species, by gear type.
- Electronic monitoring may be used in place of actual observers or at-sea monitors if the technology is deemed sufficient for a specific trip based on gear type and area fished.

FW 48 modified the goals and objectives of the groundfish monitoring program, as follows:

#### **Goal 1: Improve documentation of catch**

Objectives:

Determine total catch and effort, for each sector and common pool, of target or regulated species. Achieve coverage level sufficient to minimize effects of potential monitoring bias to the extent possible while maintaining as much flexibility as possible to enhance fleet viability.

#### **Goal 2: Reduce cost of monitoring**

Objectives:

Streamline data management and eliminate redundancy.

Explore options for cost-sharing and deferment of cost to industry. Recognize opportunity costs of insufficient monitoring.

#### **Goal 3: Incentivize reducing discards**

Objectives:

Determine discard rate by smallest possible strata while maintaining cost-effectiveness. Collect information by gear type to accurately calculate discard rates.

**Goal 4: Provide additional data streams for stock assessments**

Objectives:

Reduce management and/or biological uncertainty.

Perform biological sampling if it may be used to enhance accuracy of mortality or recruitment calculations.

**Goal 5: Enhance safety of monitoring program**

**Goal 6: Perform periodic review of monitoring program for effectiveness**

FW 55 clarified that the primary goal of the groundfish sector at-sea monitoring program is to verify area fished, catch, and discards by species, by gear type; and meeting these primary goals should be done in the most cost effective means practicable. All other goals and objectives of groundfish monitoring programs at §648.11(l) are considered equally-weighted secondary goals.

The following sections describe options to adjust landing and discard monitoring for sector vessels. These options may replace existing monitoring and reporting requirements, or may be implemented in addition to existing programs to improve data collection (e.g., improved discard monitoring systems, dockside monitors for landings, etc.). The range of alternatives considered by the Council includes the current system (No Action) as well as the options proposed below.

4.2.1.1 Option 1: No Action

*Monitoring Coverage Levels*

Amendment 16 specified a coverage level standard for sectors and required industry-funded ASM beginning in 2012. This requirement focused on the coefficient of variation (CV) of discard estimates, a measure of the precision of discard estimates, but also noted that other factors could be considered when determining coverage levels:

“For observer or at-sea monitor coverage, minimum coverage levels must meet the coefficient of variation in the Standardized Bycatch Reporting Methodology. The required levels of coverage will be set by NMFS based on information provided by the Northeast Fisheries Science Center (NEFSC) and may consider factors other than the SBRM CV standard when determining appropriate levels. Any electronic monitoring equipment or systems used to provide at-sea monitoring will be subject to the approval of NMFS through review and approval of the sector operations plan. Less than 100% electronic monitoring and at-sea observation will be required. In the event that a NMFS-sponsored observer and a third-party at-sea monitor are assigned to the same trip, only the NMFS observer must observe that trip.

Assumed discard rates will be applied to sectors unless an at-sea monitoring system (such as a sector’s independent monitoring program, a federal monitoring program, or other program that NMFS determines is adequate) provides accurate information for use of actual discard rates.”

FW 48 stated that the minimum coverage level based on CV is only appropriate for sector monitoring purposes if there is no evidence that behavior on observed and unobserved trips is different. If there is



evidence that behavior is different, then a higher coverage level may be required to ensure the accuracy of discard estimates. The required levels of coverage will be set by NMFS based on information provided by the Northeast Fisheries Science Center (NEFSC) and may consider factors other than the SBRM CV standard when determining appropriate levels. These requirements were modified in FW 55.

FW 48 clarified that for allocated groundfish stocks caught by sectors, the CV standard must be met for each stock at the overall stock level. FW 55 further clarified the Council's intent that total coverage levels for sectors should be set using only realized stock level CVs. Since FY 2012, NMFS had considered it desirable to set groundfish sector coverage levels so that 80 percent of the discard estimates have CV30 at the sector/stock/gear level. This had resulted in setting ASM coverage at levels higher than what was needed to achieve a CV30 at the overall stock level. The Council clarified that overall ASM coverage levels should not be set using an administrative standard of monitoring a percentage of discarded pounds at a CV30.

FW 55 specified that the most recent three-year average of the predicted coverage rates (based on realized stock level CVs) would be used when determining ASM coverage levels on an annual basis, consistent with the requirement that minimum coverage levels must meet the CV in the SBRM at the overall stock level. For example, the coverage rate needed to achieve a CV30 over three years would be added and then divided by three (e.g., (percent coverage necessary to meet the required coefficient of variation in year 1 + year 2 + year 3)/ 3). Since FY 2012, NMFS had used the most recent year of available data to determine coverage needed to achieve a CV30 at the stock level. While this approach had yielded relatively consistent coverage rates to-date, there is the potential that variability in a single stock could lead to wide fluctuations in the target coverage levels in the future. Using a moving average is likely to help stabilize the predicted coverage levels that are needed.

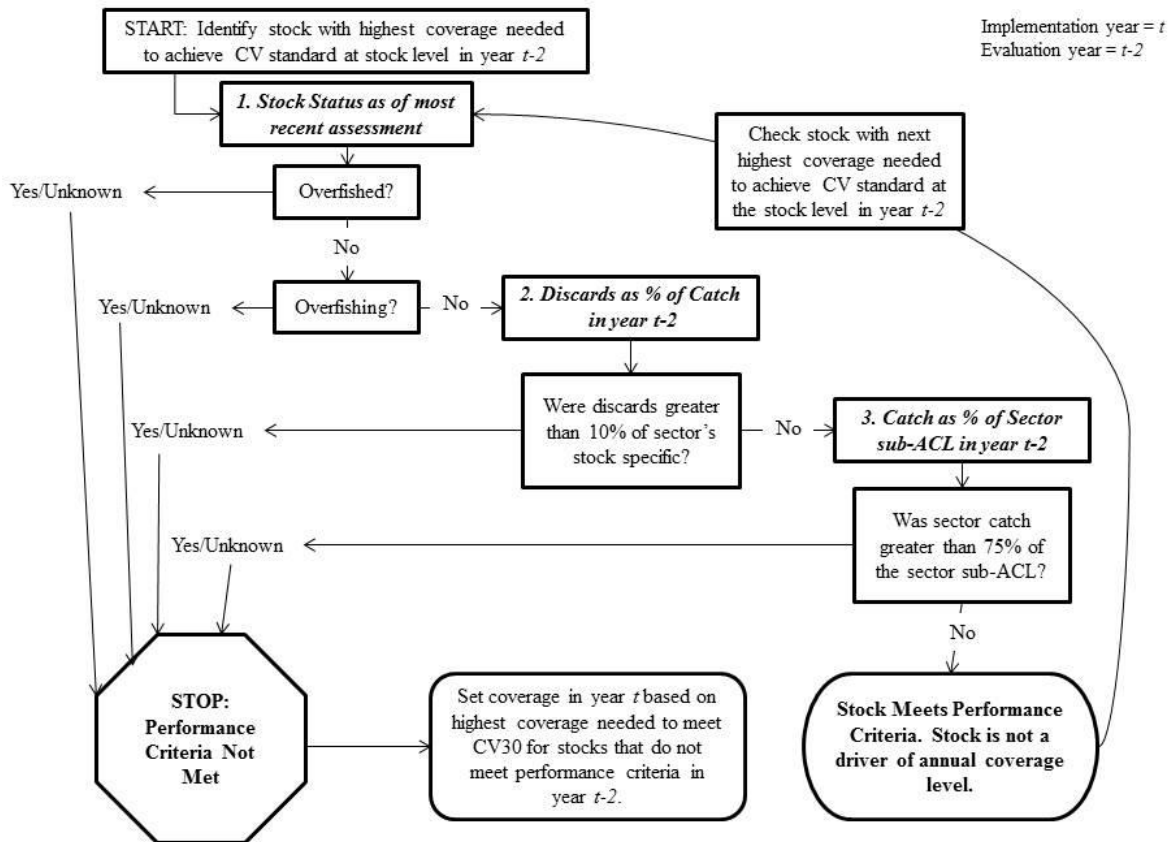
FW 55 also established a system for fishery performance criteria to be used in setting groundfish sector coverage levels. Application of the CV standard would be filtered consistent with existing goals for the monitoring program, such that stocks that meet the performance criteria are not drivers for the annual coverage level. This does not remove the 30 percent CV standard; rather, stocks that meet these criteria would not dictate the predicted ASM coverage needs for a given fishing year. Realized ASM coverage levels would need to be consistent with the Goals and Objectives of groundfish monitoring program as adopted through FW48 (described in Section 4.2.1).

The three fishery performance criteria are:

1. Stock Condition – Not overfished and overfishing is not occurring.
2. The percentage of sector sub-ACL catch comprised of discards (less than or equal to 10%).
3. The percentage of the sector sub-ACL harvested (less than or equal to 75%).

In practice, coverage levels are set based on the stock with the highest coverage level needed to achieve the CV standard. Figure 1 describes the process for determining coverage levels by iterating through each of the criteria.

Figure 1 - Process for applying the performance criteria when setting coverage rates.



The Council provided rationale that using fishery performance criteria for predicting the target ASM coverage level reduces the cost of monitoring while maintaining coverage levels sufficient to improve the documentation of catch, incentivize reducing discards, and provide additional data streams for stock assessments. By using performance criteria to identify healthy stocks for which percentage of the sub-ACL harvested and discards of stock-specific catch are low, the performance criteria reduce the chance that a realized stock specific CV above the standard would result in sectors exceeding their sub-ACL. In doing so, this option sought to balance the goals of minimizing the effects of potential monitoring bias to the extent possible while maintaining as much flexibility as possible to enhance fleet viability. The Council considered a range of catch as a percentage of the sector sub-ACL of 50% - 75%, and discards as a percentage of catch from 5% - 10%. The Council clarified that its preferred performance criteria thresholds are stock specific catch is equal to or less than 75% of the sector sub-ACL and discards are equal to or less than 10% of catch.

Additionally, FW 55 removed the ASM coverage requirement for sector trips using gillnets with extra-large mesh (10 inches (25.4 cm) or greater) in the SNE/MA and Inshore GB Broad Stock Areas. The Council's rationale was that this would reduce the cost of monitoring while maintaining coverage levels which are consistent with non-sector trips that target non-groundfish species (through SBRM coverage). The majority of catch on sector trips using ELM gear is of non-groundfish stocks, such as skates, monkfish, and dogfish, with minimal groundfish catch, and so reducing ASM coverage for these trips allows resources to be used to monitor trips that catch more groundfish, which could improve discard

estimates for directed groundfish trips.

If Option 1/No Action is adopted, groundfish monitoring coverage level requirements would remain as defined in Amendment 16 and subsequent framework actions (Framework Adjustment (FW) 48, and FW 55). Currently, the target at-sea monitoring/electronic monitoring coverage level must meet the CV precision standard specified in the Standardized Bycatch Reporting Methodology (currently a 30 percent CV) for discard estimates at the stock level for all sectors and gears combined. Additionally, sector coverage levels are based on the most recent 3-year average of the total required coverage level necessary to reach the required CV for each stock, and are set using fishery performance criteria so that stocks that meet the performance criteria (not overfished, with overfishing not occurring according to the most recent available stock assessment, and that in the previous fishing year have less than 75 percent of the sector sub-ACL harvested, and less than 10 percent of catch comprised of discards) are not drivers for the annual coverage level.

#### *Electronic Monitoring*

Amendment 16 specified that electronic monitoring (EM) may be used in place of actual observers or at-sea monitors if the technology is deemed sufficient for a specific trip based on gear type and area fished. Option 1/ No Action would maintain the current process for approval of EM for monitoring by NMFS.

#### *Dockside Monitoring*

Beginning in FY 2010, Amendment 16 established implementation of a dockside monitoring program in the groundfish fishery, in order to verify landings of a vessel at the time it is weighed by a dealer and to certify the landing weights are accurate as reported on the dealer report. Sectors were required to develop and implement an independent third-party weighmaster/dockside monitoring system that was satisfactory to NMFS for monitoring landings and utilization of ACE. The details of the weighmaster/dockside monitoring system were to be provided in the sector's operations plan. Common pool vessels were to become subject to dockside/roving monitoring upon the transition to a trimester total allowable catch (TAC) accountability measure (AM). Amendment 16 specified a requirement for pre-sailing and pre-landing hails in order to coordinate the deployment of dockside or roving monitors, and required reports of those hails to be made to the sector manager/monitoring contractor (and other entities if directed by NMFS). The requirement for dockside monitoring was imposed immediately for vessels fishing in sectors and in FY 2012 for common pool vessels.

For dockside monitoring, the required coverage were as follows:

FY 2010: Random dockside monitoring of 50% of trips in each sector.

Subsequent years: Random dockside monitoring of 20% of trips in each sector.

FW 45 modified the dockside monitoring program so that in FY 2011 and FY 2012 there was no requirement that dockside monitoring of sector catches be funded by sectors. NMFS was to provide as much funding as possible for dockside monitoring of up to 100 percent of sector trips, and, starting in FY 2012, common pool trips as well, if funds were available. If funds were not available for monitoring 100 percent of trips, priority was to be given to monitor trips that did not have an at-sea observer, at-sea monitor, or an approved electronic monitor. Rationale provided for this change in funding requirement was that since this measure did not replace dealer reporting or VTRs, it did not produce a new data stream that assists the assessment and management of the fishery. Eliminating the requirement reduced monitoring costs to industry, avoided duplication of effort, and did not reduce the availability of landings information. If the cost was to be covered by NMFS, the industry did see some benefit in continuation of the program. Also, FW 45 specified that the reporting requirements associated with a dockside monitoring

program were not considered reporting requirements for sectors, and the Regional Administrator could exempt sector participants from these requirements as part of the approval of yearly operations plans.

Building on operational standards developed for dockside monitoring in Amendment 16, FW 45 established the requirement that dockside monitors inspect the fish holds for any trip that was assigned a dockside/roving monitor beginning in FY 2011. This requirement was intended to enhance the enforceability of existing provisions and minimize the incentives to underreport/ misreport the amount of regulated species landed. However, this requirement was removed by NMFS prior to developing protocols and training for dockside monitors to board vessels, due to safety concerns raised on samplers inspecting a fish hold. NMFS made the determination that retaining the vessel trip-end (pre-landing) hail requirement was sufficient to provide an efficient and effective means for observation and enforcement of vessel landing requirements through unannounced observation of vessel offloads at the discretion of law enforcement, which could include inspection of the hold.

FW 45 also specified that vessels fishing under a Handgear A or Handgear B permit, or a Small Vessel Exemption permit, were exempted from the dockside monitoring requirements adopted by Amendment 16 when fishing in the common pool, because these permit categories land small quantities of groundfish and the expense of the monitoring requirements would make them uneconomical.

FW 48 eliminated all dockside monitoring requirements that were adopted in Amendment 16, as modified by FW 45, beginning in FY 2013. The rationale provided was that dockside monitoring increases the operating costs of sectors, and landings information is already provided through the dealer reporting system. The Council's rationale was that as long as unreported landings do not occur, the dealer reports can be used to monitor sector landings and there is little advantage to having dockside monitors verify these reports. By eliminating the program, sector operating costs would be reduced and redundant accounting would be avoided. NMFS determined that dealer reporting combined with dockside intercepts by enforcement personnel were potentially sufficient to monitor landings of sector catch at the time. However, after the removal of the DSM program there were incidents of unreported and misreported landings.

There is currently no requirement for dockside monitoring for the groundfish monitoring program. Option 1/No Action would continue to maintain no requirement for dockside monitoring for the groundfish fishery.

#### 4.2.2.2 Groundfish Monitoring Program Revisions

*To be developed...*