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MEMORANDUM

DATE: April 8, 2016

TO: New England Fishery Management Council
Mid-Atlantic Fishery Management Council

FROM: Industry-Funded Monitoring Plan Development Team/Fishery Management Action Team

SUBJECT: Industry-Funded Monitoring (IFM) Omnibus Amendment Development

The PDT/FMAT met on March 31, 2016 (partly in-person, partly via webinar), to consider the consensus statement drafted by the New England Fishery Management Council's Herring Committee at its March 16, 2016, meeting. PDT/FMAT participants included: Brant McAfee, Carly Bari, Carrie Nordeen, Katie Richardson, Dan Luers (NMFS GARFO); Dr. Andrew Kitts, Amy Martins, Sara Weeks (NMFS NEFSC), Jason Didden (MAFMC); and Dr. Jamie Cournane, Maria Jacob (NEFMC). Dr. Rachel Feeney (NEFMC), the interim Herring Plan Coordinator, also participated in this meeting. This memo summarizes the PDT/FMAT discussion of each component of the consensus statement.

1. **Herring Committee consensus statement:** 1) Refine the at-sea monitoring (ASM) sampling design and training requirements to better meet the goals identified for the herring coverage target alternatives to improve catch estimation that would inform the catch caps, and 2) Any ASM option should include monitoring of catch that is retained.

   PDT/FMAT discussed revisions to ASM alternatives to improve the utility of the alternatives.
   - Current ASM alternatives limit data collection to discarded catch. While the Councils' original intent was to create a lowest-possible cost monitor option, the herring and mackerel fisheries have minimal discarding, so data utility of the current ASM alternatives is very limited. Revising ASM alternatives to collect data on both retained and discarded catch would better address some of the objectives identified for the herring coverage target alternatives.
   - ASM sampling design that includes collection of retained catch would result in fewer differences in the type and amount of data collected from NEFOP-level observers. The main differences between the two types of data collection would be that NEFOP-level observers conduct necropsies and collect biological samples, but at-sea monitors would not collect this information.
   - Cost estimates for ASM ($710 estimated industry cost per sea day) are based on the Groundfish ASM program, but the actual cost of a herring at-sea monitor may be less because they would be collecting data on discards only. Increasing herring at-sea

monitor responsibilities would likely increase training, equipment, and data editing costs, therefore increasing overall costs of ASM coverage. Actual cost differences between ASM and NEFOP-level observer ($818 estimated industry cost per sea day) coverage may be reduced if ASM collects data on retained catch.

PDT/FMAT recommendations:

- Revise ASM alternatives to include data being collected on both retained and discarded catch and adjust the biological impacts analysis accordingly, or
- Expand the range of NEFOP-Level Observer Alternatives to include 25%, 50%, and 75% coverage options and adjust the economic impacts analysis accordingly.

2. **Herring Committee consensus statement:** Include analysis of haddock bycatch outside the groundfish closed areas, for bycatch rate comparison inside the groundfish closed areas.

   PDT/FMAT response:

   - Groundfish Frameworks 43 and 46 and Herring Amendment 5 have background information and analyses that will be added to the next version of the IFM Amendment Draft Environmental Assessment (EA) (available for June Council meetings), but the information is dated.
   - More information may be developed that could be added to the IFM Amendment as the Council develops an action to consider changes to the accountability measure for the Georges Bank haddock catch cap.

3. **Herring Committee consensus statement:** Improve biological impact analysis to include other quantitative and qualitative analysis (e.g., how past monitoring has affected the CV, coverage levels).

   PDT/FMAT response:

   - Analyze the CV associated with the Coverage Target Alternative 1 (No Action) for estimating catch tracked against fishery catch caps (haddock and river herring/shad).
   - If ASM alternatives are revised to collect both retained and discarded catch, revise the CV analysis for ASM alternatives to evaluate precision around fishery catch cap estimates.
   - Include updated baseline information on past fishery catch and observer coverage in the Affected Environment section of the Draft EA.
   - Include the percent occurrence of river herring and shad to help better define the estimates of uncertainty.
   - Include previous analysis evaluating coverage necessary to obtain a 30% CV on river herring and shad catch for Coverage Target Alternatives 2.3 (midwater trawl vessels only) and 2.4 in the IFM Amendment Draft EA.

4. **Herring Committee consensus statement:** Describe which ports may not be sampled portside, and analyze the impacts of potentially precluding landings.

PDT/FMAT received a portside sampling presentation from Brad Schondelmeier (MA DMF) with input from Dr. Matt Cieri (ME DMR) and discussed the following issues:

- MA currently samples about 50% of midwater trips landed in MA and 25% of bottom trawl trips landed in RI, and ME samples about 10-25% of purse seine trips in addition to other gear types.
- Some midwater trawl landing ports are not currently suitable for portside sampling.
    - Offload sites within certain ports are not sampled for a variety of reasons, such as logistics, staff resources, budget limitations, and safety issues.
    - Ports that typically have smaller offloads are not sampled most often because sampling resources are directed to the sites with the highest activity.
- May be able to collect representative sample of midwater trawl catch without sampling in all ports, but more analysis for this is needed.
    - It may only be applicable for midwater trawl vessels that are fishing together in the same area.
    - Less likely if vessels are fishing in different areas or in multiple areas on the same trip.
- It is possible to add sampling stations in ports that are not currently sampled.
    - Sampling stations could be set up at some ports, but it would require funding. Cost estimates for new sampling stations can be obtained.
    - Availability of scales ($1,200 per scale) can be a limiting factor, but scales can be moved from port to port.
    - ME contracted to have sampling stations built and those stations are now owned by the industry.
    - May need to require that vessels provide safe access to fish.
    - Pumping rates and volume of catch can affect sampling costs.
- Coverage Target Alternatives 2.3 and 2.4 describe that vessels would be notified before beginning a trip whether or not that trip would be sampled portside.
    - MA and ME programs request to sample vessels when the vessels enter port.
    - Vessels may adjust fishing area if they know in advance that a trip will be sampled portside.
    - Could revise portside sampling notification details in IFM Amendment to make them more similar to current portside notification practices to minimize potential for any effect from changes in fishing behavior.

PDT/FMAT response:

- Evaluate which offloading sites and ports are not sampled and for what reason.
- Evaluate what would be needed to enable portside sampling in all midwater trawl ports.
- Analyze the economic impacts associated with limiting midwater trawl landings to ports that can be sampled.
- Allow flexibility in IFM Amendment regarding the timing of when vessels are notified whether or not a trip would be sampled portside.

5. **Herring Committee consensus statement:** Tables (on page 65 of discussion document) regarding return to owner information need context to allow the public and Committee members to understand the impacts, particularly the differential impacts for those vessels considered outliers in the data.

   PDT/FMAT response:
   - Include an "illustrative example" for the first box plot.
   - Provide narrative text for each box plot highlighting key takeaways.

6. **Herring Committee consensus statement:** Clarify in the document whether the RTO information considers amortization (i.e., depreciating value of vessels).

   PDT/FMAT response:
   - Revise the table summarizing the results of the 2014 cost survey to explain that RTO does not include the depreciating value of the vessel over time.

7. **Herring Committee consensus statement:** The coverage target percentages currently do not include SBRM coverage, and are described as additive. The Committee supports including SBRM coverage to meet coverage target.

   PDT/FMAT discussed an additive coverage target (IFM coverage target in addition to SBRM coverage) versus a combined coverage target (SBRM coverage + IFM coverage = overall coverage target):
   - Through the development of the IFM Amendment the coverage targets for herring and mackerel were intentionally developed to be independent of and in addition to SBRM. The reason for this development was because SBRM was developed with specific goals in mind to address bycatch of targeted and protected species, which are different than the goals in the IFM Amendment to address accuracy in catch estimates.
   - Benefits of a combination coverage target
     - Potentially lowering IFM coverage may result in cost savings for industry relative to an additive coverage target.
     - Coverage would be designated to a reach particular target, not an unknown base (SBRM coverage) plus fixed additional coverage (IFM coverage).
     - Provides consistency with other Council actions (i.e., ASM coverage levels for groundfish sectors).
   - Concerns with a combination coverage target
     - Herring and mackerel coverage target alternatives (primarily allocated by permit) do not align with SBRM coverage (allocated by gear, mesh, area).
     - SBRM coverage is difficult to translate in advance to a percent coverage target and does not distinguish between trips declared into different fisheries.
     - Timing of herring and mackerel fishing years (Jan – Dec) is a mismatch for the SBRM year (April – March).
     - Because of the variability of SBRM coverage across gear types, there may be equity concerns with a combination coverage target.

PDT/FMAT recommendations:

- Consider maintaining the herring and mackerel coverage targets as independent of SBRM and not developing a combined coverage target. (The PDT/FMAT did not come to a consensus as to which approach, additive or combined, they recommend to the Councils.)
- Having the target be added onto SBRM coverage would be best from an implementation perspective.
- Any projection on how to obtain a combination coverage target "next year" will most likely be a rough approximation for the reasons cited above.
- Council could take into account the average SBRM coverage for a particular fleet when selecting an IFM coverage target.

8. **Herring Committee consensus statement:** Modify language on portside sampling to state that the rationale for any deviation to the Council-selected target level for portside sampling and EM review rates should be brought before the Council for consideration.

PDT/FMAT response:

- Revise language in the IFM Amendment to describe that changes to target EM review rates and portside sampling rates would be evaluated by the Councils.