

DRAFT Amendment 23

Likely Range of Alternatives

1. Introduction

1a. Purpose and Need

To implement measures to improve reliability and accountability of catch reporting and to ensure a precise and accurate representation of catch (landings and discards).

To improve the accuracy of collected catch data. Accurate catch data are necessary to ensure that catch limits are set at levels that prevent overfishing and to determine when catch limits are exceeded. To create fair and equitable catch reporting requirements for all commercial groundfish fishermen, while maximizing the value of collected catch data and minimizing costs for the fishing industry and the National Marine Fisheries Service.

1b. Groundfish Sector 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.

The following sections describe options to adjust landing and discard monitoring for sector vessels, as well as options for streamlining sector reporting requirements. 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, see above) as well as the options proposed below.

2. Alternatives

2a. Monitoring Coverage Levels

Determining Target Monitoring Coverage Level

Currently, the target at-sea monitoring/electronic monitoring coverage level must meet the coefficient of variance (CV) specified in the Standardized Bycatch Reporting Methodology (currently a 30 percent CV) for discard estimates at the stock level for all sectors combined (see No action alternative). This action would consider the following:

- Re-evaluation of the 30 percent CV precision standard and how the standard is applied to determine the target monitoring coverage level. This could include adjusting the required level of precision (e.g. 20 percent CV, 40 percent CV), the level at which the CV standard is applied (e.g. fishery level), or the methods used to set the target coverage level.
- Alternative methodologies to the CV standard for determining the target monitoring coverage level. This could include fixed target coverage levels (e.g., an annual target coverage level of 25 percent or 50 percent of all sector trips), confidence intervals, or fixed discard rates.

The goal is to achieve a monitoring coverage level that ensures precise and accurate catch (landings and discards) estimation and minimizes the potential for biases in the estimates.

Knowing Total Monitoring Coverage Level at a time certain

This action 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 assist sectors for business planning. 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.

Certain alternatives under “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.

2b. Measures to improve the reliability, accountability, accuracy, and precision of discards

The following alternatives will consider changes to how discards are monitored in the groundfish fishery. The goal is to improve the reliability and accountability of catch reporting with regard to discards.

Electronic Monitoring for discard accounting

Amendment 16 allows for the use of electronic monitoring (EM) in place of at-sea monitoring (ASM) if the technology is approved by NMFS. This action would approve EM as a voluntary option for sectors to use to monitor their discards. Currently, regulations state that an EM program must provide the same CV standard as ASM to be considered an acceptable substitute. The goal of all EM alternatives is to offer flexibility to vessels by providing additional options to use for sector monitoring.

This action would consider the following EM approaches for monitoring discards:

- An approved alternative to at-sea monitoring (ASM), where EM only runs on trips for which the vessel is selected for coverage and is used to directly estimate discards.
- An audit-based approach for EM, where EM runs on 100% of trips and a subset of hauls or trips is reviewed to verify vessel trip report (VTR)-reported discards.
- A census-based approach for EM, where EM runs on 100% of trips and a subset of hauls or trips is reviewed to directly estimate discards.
- A maximized retention approach for EM, where EM runs on 100% of trips to verify retention of all groundfish species.

2c. Measures to improve the reliability, accountability, accuracy and precision of landings

The following alternatives will consider changes to how landings are monitored in the groundfish fishery. The goal is to improve the reliability and accountability of catch reporting with regard to landings.

Dockside Monitoring

This action would create a dockside monitoring (DSM) program that would focus on monitoring landings and would independently verify landed catch. The goal of a DSM program system is to provide an independent landings data stream that may be compared to dealer-reported landings in order to ensure accurate accounting for/estimation of landings. This action may consider that monitors be allowed to access the fish hold of vessels to verify that all of the catch is offloaded and accounted for, which would

address a concern with a previous DSM program created under Amendment 16 that has since been discontinued.

Electronic Monitoring for landings verification

A maximized retention approach for EM, where EM verifies that all groundfish are landed and uses DSM to sample catch. For this approach, vessels would be required to land all groundfish, which would eliminate the need to monitor discards. DSM would be used to sample all landed groundfish, which would now include fish that previously would have been sublegal. A maximum retention approach to EM may also be useful to ensure that catch is assigned to the correct stock/stat area (reducing area misreporting), by using the time stamps on the EM videos and the vessel monitoring systems (VMS) to verify that catch is being accurately reported to the stat area on the VTR.

2d. Streamlining Sector Reporting

The following alternatives will consider changes to the administration of the 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, and improve timeliness of data processing.

Sector Reporting

This action 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.

This action may consider other steps to streamline the overall sector reporting process. Examples include:

- 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.

2f. Funding for Sector and Groundfish 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 23.¹

Funding source ideas

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

- Subsidized upfront equipment costs for EM by private or nonprofit organizations.
- Quota auctions and quota set-asides, where a portion of the ACL for key stocks could be set aside and auctioned off annually to fund monitoring. This is particularly true for those stocks that constrain fishing for more abundant stocks where a small amount of quota obtained through the auction would open additional fishing opportunity. 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 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.

Additionally, there is support for the Council evaluating the use of public-private partnerships to help fund increased monitoring coverage.

¹The 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.