PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C6 Observer 2018 ADP, OAC/EFMWG report

	NAME *(Please Print)*	TESTIFYING ON BEHALF OF:	Check the boxes below if you will have a PowerPoint or Handout: Handout	PPT
1	[redacted]	PFC		
2	Molly Zaleski & Jon Warrenchuk	Oceana		
3	BRENT PAINE & RUTH CHRISTIANSEN	UCB	X	
4	DAN FALVEY	ALFA		
5	~~Bob Alverson~~ withdrew	FVOA - Seattle		
6	Malcolm Milne, Nancy Munro	NPFA / Saltwater Inc		
7	Todd Hupp	SeaT		
8	Julie Bonney	AGDB		
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person " to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.

October 6, 2017

Mr. Dan Hull, Chairman
NPFMC
605 W. 4th Ave Suite 306
Anchorage, Alaska 99501

Re: Agenda Item C6, Observer Issues

Dear Mr. Hull and Fellow NPFMC Members,

At the April 2017 NPFMC meeting, we provided testimony under the 'Staff Tasking' agenda item about UCB's intent on developing a new EFP proposal that would allow us to test the efficacy of using Electronic Monitoring technology in the Eastern Bering Sea Pollock shorebased catcher vessel trawl fishery. To this end, UCB is asking for the Council to support initiation of the necessary action items towards the development of an electronic monitoring program for the Bering Sea Pollock catcher vessel fleet. This includes cooperation between NMFS, the Observer Program, and industry on development of an EFP for approval and implementation by June 2018.

Rationale

The Bering Sea Pollock CV fleet will be submitting an EFP application (mid-November 2017) to the AKRO seeking to use electronic monitoring in lieu of the 100% human observer coverage requirement for compliance monitoring purposes.

- In June 2013, NMFS presented and the NPFMC adopted an EM/ER Strategic Plan as a guidance document for incorporating EM into the Observer Program. Our proposed electronic monitoring EFP project directly addresses Goal III, Objective 2, Strategy B of this Strategic Plan.
    - Goal III states: NMFS has a cost-effective, adaptable, and sustainable fishery data collection program and takes advantage of the full range of current and emerging technologies.
    - Objective 2 states: Implement EM/ER technology where appropriate and cost effective to enhance compliance monitoring.
    - Strategy B states: Expand the use of EM in compliance applications (Action: Evaluate EM for compliance monitoring in shoreside Pollock fisheries).

During its most recent meeting, the OAC stated that the ideal solution for Chinook salmon PSC in the GOA Pollock fishery would be to monitor all offloads at the plant and require EM on trawl vessels to ensure there are no discards, however, they also acknowledged that this would be a

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long-term process. To this end, the EBS Pollock CV fleet is in an ideal position to achieve significant strides towards this goal.

- Through our EM EFP application, we are seeking to build upon the success of the West Coast Whiting fishery, which has utilized electronic monitoring for compliance purposes for several years.
    - Much like the West Coast Whiting fishery, the Bering Sea Pollock fishery employs midwater trawl gear in a high volume, maximized retention fishery (discard amounts average less than one percent of amount harvested) that delivers unsorted catch to shoreside processing facilities.
    - There are several crossover vessels that fish in both the Whiting and BS Pollock fisheries that already have fully operational EM camera systems already installed. These vessels will provide a valuable starting point for initiation of an EFP.
- We envision the execution of our EFP as an iterative and deliberative process able to capitalize on the ideal position of the BS Pollock CV fleet. Once the parameters in the Bering Sea are worked out, the GOA Pollock fleet should be able to adapt the procedures and requirements towards their own successful EM program.

Touching upon a few more details in its report, the OAC is asking the Council to prioritize the EM projects listed in the table on page 10 of their report. UCB believes that our EFP project (item #3 in the table) is a logical and practical next step for task initiation. We do not believe its initiation will hinder continuance of the first item in the table (BSAI trawl CP halibut decksorting). And as previously stated, we believe that it will lay the foundation for work in the GOA Pollock fishery (item #4 in the table).

Regarding the current observer program analytical task list, UCB believes our EFP naturally falls under Item #10 (program level projects) to extend EM to new fleets while simultaneously working to facilitate Item #21 (projects in development of review) for full retention of GOA Pollock trawl CVs with EM compliance. As a general rule, the OAC recommends prioritizing the decksorting regulatory analysis, followed by work on low selection rates next steps, the observer insurance amendment (when national guidance is available), and observer tender actions for which full retention compliance EM in the GOA Pollock fishery is included.

In conclusion, our EFP provides an ideal opportunity to meet the varying needs of and achieve success on multiple levels not only for the BS Pollock CV fleet, but also for the GOA Pollock fleet, the Council, NMFS, and the Observer Program. This is an important project that will work towards a more cost effective, adaptable, sustainable, consistent, and reliable fishery data collection program and strategy that take advantage of current and emerging technologies. As such, we are asking for the Council's support and endorsement as we move forward. It was acknowledged by both the EM Workgroup and OAC that there is a need for the Council to reassess its EM priorities; for all of the reasons stated above, we believe priority should be placed on our project.

Sincerely,

Brent C. Paine