**North Pacific Fishery Management Council**

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National Fish & Wildlife Foundation
1133 Fifteenth Street, NW
Washington, DC 20005
Via email: Gray.Redding@nfwf.org

Dear Sir or Madam:

On behalf of the North Pacific Fishery Management Council (Council), I am writing in support of proposals related to Alaska fisheries that have been submitted in response to the Electronic Monitoring (EM) and Reporting Request for Proposals and are directly responsive to the Council's priorities and plans for trawl and fixed gear EM programs:

- Proposal from United Catcher Boats for the Final Year of Pre-Implementation of a Regulated EM Program for Compliance Monitoring in the Bering Sea and Gulf of Alaska Pelagic Trawl Pollock Catcher Vessel Fisheries
- Proposal from Aleutians East Borough for Improving Data Quality through ET Implementation in the Western Gulf of Alaska
- Proposal from Alaska Groundfish Databank for Testing Electronic Monitoring on Trawl Catcher Vessels Participating in the Central Gulf of Alaska (CGOA) Rockfish Program
- Proposal from Real Time Data for real time electronic logbook data collection and reporting in Alaska's groundfish and halibut fisheries

The Council has actively pursued the development of EM technology for several years. Between 2014 and 2017, the Council's priority was cooperative research for fixed gear vessels, field testing the use of camera systems, and integrating fixed gear EM data with catch accounting databases to obtain estimates of at-sea discards. Thanks in large part to support from NFWF, the Council was able to implement a regulatory framework in 2017 to allow EM as an alternative to carrying an observer to meet the monitoring requirements for the fixed gear groundfish and halibut fisheries off Alaska. The fixed gear EM program has been operational since 2018 and has successfully met the initial objectives of providing an alternative for fixed gear vessels that have difficulty accommodating a human observer and is also proving to be a cost-effective tool for catch monitoring; and consequently is strongly supported by the fleet.

With an operational fixed gear EM program in place, the Council turned its attention to Bering Sea and Gulf of Alaska pelagic trawl catcher vessels, initially those participating in the pollock fishery. The Council has great need for more precise estimates of bycatch in trawl fisheries and recognizes the demonstrated value of EM systems, in combination with shore-based monitoring, to improve cost efficiency, reduce bias and increase precision of bycatch monitoring for vessels that are delivering to tender vessels. Through the Council's Trawl EM Committee, which brings together representatives from the fishing industry, management and enforcement agency representatives, and EM service providers, the Council developed a robust Cooperative Research Plan, and adopted the following objectives for trawl EM development:

- improve salmon bycatch accounting;
- reduce monitoring costs; and,
- improve the overall quality of monitoring data.

This committee provides ongoing Council oversight and coordination for the current NFWF funded projects and other EM development and implementation efforts. This increases the likelihood that NFWF funded projects will be successful, and it facilitates the transition of NFWF project outcomes into fully integrated components of the industry funded fishery monitoring program.

In 2020 an Exempted Fishing Permit (EFP) was issued to evaluate the efficacy of EM systems and shoreside observers for pollock catcher vessels using pelagic trawl gear and tenders in the eastern Bering Sea and Gulf of Alaska. The project combines EM systems that provide at-sea monitoring of vessels for compliance with fishery management objectives to achieve maximized retention, electronic reporting of catch and discard information, and shoreside observers to monitor salmon bycatch and collect biological information. Thanks, in large part to NFWF support, this program has expanded and in 2021, 68 catcher vessels and three tenders participated in this EFP.

The fishery monitoring data generated from this project, under the terms of the EFP, are already being incorporated into the NMFS catch accounting database and are used for management. In June 2021, the Council took action to initiate analysis to implement a trawl EM program, targeting January 2024 for the beginning of the regulated program. Under this regulatory timeline external funding support will be necessary, through 2023. The Council remains committed to January 2024 implementation.

In 2021 and 2022, NFWF provided support for multiple proposals for Alaska fisheries, which the Council greatly appreciates, that have improved the fixed gear EM program and supported significant progress in the development of trawl EM. External funding is essential for development of these programs, as revenue from the partial coverage observer fee (used to fund monitoring costs throughout Alaska) can only be used to support EM once a program is implemented in regulation. The proposals that are being submitted this year build on and extend the accomplishments from the projects funded in 2021.

The Council supports the **proposal submitted by UCB for the Final Year of Pre-Implementation of a Regulated EM Program for Compliance Monitoring in the Bering Sea and Gulf of Alaska Pelagic Trawl Pollock Catcher Vessel Fisheries.** The Council has approved a purpose and need for EM for compliance monitoring in BS and GOA pollock catcher vessel fisheries and, based on review of the project to date, initiated analysis for a regulated EM program. This final pre-implementation phase will allow for the refinement of protocols for EM video data and shoreside monitoring for incorporation into a mature regulated management program in January 2024, and ensure continuity of the program as it transitions to self-funding starting in 2024.

The Council supports the **proposal submitted by Aleutians East Borough for Improving Data Quality through ET Implementation in the Western Gulf of Alaska** that will provide the accurate and timely target and bycatch data (particularly salmon) that is essential for conservation and management. This includes the final year of funding for the vessels and tenders participating in the EFP in the western Gulf of Alaska, ensuring continuity for this fleet until self-funding begins in 2024. This project will continue to develop and test tools to modernize data management such as eLog, streamlining data review, the WGOA fishermen's data portal, as well as a subproject to test EM in plants, to potentially replace the need for a human observer to stand and watch the sorting line, another potential cost control tool.

The Council supports **a proposal submitted by Alaska Groundfish Databank, Testing Electronic Monitoring on Trawl Catcher Vessels Participating in the Central Gulf of Alaska (CGOA) Rockfish Program.** This project will use existing onboard video systems to develop monitoring of conservation limits on the CGOA rockfish trawl fishery. During the proof-of-concept phase, vessels will use these systems to collect EM video while continuing to carry observers. That video will be reviewed and evaluated to develop fish handling protocols that allow for verifying salmon retention and quantifying halibut PSC discards, while assessing groundfish discards across all targets and gear types. These catch handling protocols will be subsequently tested on three catcher vessels during the pilot phase. This project builds on existing EM systems used in the west coast pelagic trawl Pacific whiting fishery and the Bering Sea and Gulf of Alaska pelagic trawl pollock fishery and prior work to evaluate EM for the catcher vessel rockfish fishery.

The Council also supports **a proposal submitted by Real Time Data for real time electronic logbook data collection and reporting in Alaska's groundfish and halibut fisheries.** The Real Time Data project will provide customized data collection software and hardware to 30 vessels in the Gulf of Alaska fixed gear halibut and sablefish fisheries. The high-resolution nature of the data collected will provide opportunities for better co-management of the resource, stock assessments, TAC-setting, and for fishers to have more accurate and timely catch and effort information, further extending the value of the current EM program for these vessels.

In sum, the Council recognizes the value of the proposals submitted by the Alaska regional stakeholders: for the expanded development and progress towards an implemented regulatory program for EM as a compliance tool in Bering Sea and Gulf of Alaska pelagic trawl fisheries focused towards meeting the Council's goal of reducing costs and improving data quality; to test EM in the CGOA rockfish fishery to develop the next logical step in expanding the use of EM in Alaska trawl fisheries; and develop electronic logbook technologies that will improve efficiency and quality of data collection in Alaska's fixed gear sablefish and halibut fisheries.

Given the Council meeting schedule, this is the earliest the Council could comment on these proposals, however I hope that you will consider the proposals submitted from these stakeholders favorably and that although the proposal deadline has passed, this letter can be distributed to reviewers. The Council is ready to invest our resources to ongoing oversight and coordination that will facilitate successful execution of all four projects.

Sincerely,

Simon Kinneen
Chairman