

## **Electronic monitoring discussion topic**

### **Threshold participation levels for electronic monitoring programs**

Agency, Council, industry, and other stakeholder experience with electronic monitoring (EM) is growing with implementation and pre-implementation in a number of fisheries around the country. With this experience is more and better information about the costs and logistical challenges of designing and implementing EM programs. A legitimate question emerging from this experience with whether there should be minimum participation levels in EM programs to ensure that costly monitoring systems are not developed, implemented, and maintained for a small number of vessels. Further that development and fixed costs can be justified with respect to the number of vessels in a particular EM program.

EM programs are costly to plan and implement and small EM programs have or will likely result in high costs per vessels. Some examples of this scenario are the West Coast drift gillnet fishery and possibly the Maine Coastal Community Sector in New England. The planned EM program for the West Coast drift gillnet fishery will be for 20-25 vessels if every vessel in the fishery uses EM; an unlikely scenario. A more likely scenario is that there will be 4-6 vessels participating. With the Maine Coastal Community Sector (MCCS), there are currently 3 vessels (there was a recent sinking of one of the EM vessels) participating in the pre-implementation and a few more might get picked up next year. The current level of participation is less than was anticipated by the sector last year, and it is unlikely that participation levels will increase significantly in the next year or two because of continued low stock and fishing opportunity levels, and because some fishermen are increasingly concerned that, as EM participants, they will be subject to levels of enforcement and accountability greater than that other fleet members.

With limited participation in EM programs, this scenario has cost implications for participating vessels and for NOAA Fisheries. For industry members, program fixed costs would be applied to a small number of vessels resulting in high fixed costs per vessel. For NOAA fisheries, the result could be programs that are expensive, time consuming, and providing monitoring information at high costs but for a small number of participating vessels.

This raises some policy questions because cost efficiencies for vessels and NMFS are a major reason that EM is being considered. Implementation of a minimum participation level would be a change from current agency practice to date but is a logical part of learning from the EM testing and implementation done nationally. With cost as a major

driver for considering EM, determining an efficiency standard for approval of EM programs is a way of making sure that we move toward cost effective application of electronic technologies. There are clearly other reasons to consider EM such as vessel size constraints and remote locations that may argue for using EM even if a given program is costly.

If pursued, minimum participation levels could be implemented in a number of ways. Application of threshold participation levels could be done in a number of ways, including:

- 1) Applying only to new EM programs;
- 2) Apply threshold participation levels to implemented programs but allow lesser participation levels for pre-implementation;
- 3) Threshold participation levels could be implemented in terms of:
  - a. Minimum number of vessels participating in EM program;
  - b. Minimum percentage of a fleet participating in EM program;
  - c. A combination of minimum number of vessels and percentage of a fleet participating in EM program.