



New England Fishery Management Council

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MEMORANDUM

DATE: March 31, 2014
TO: Herring Committee Members
FROM: Lori Steele, NEFMC Staff
SUBJECT: **NMFS APSD Comments on Framework 4 Dealer Alternatives**

Attached please find comments provided by NMFS' Analysis and Program Support Division (APSD) regarding the alternatives under consideration in Framework 4 to address dealer weighing/reporting provisions. An updated description of NMFS' Atlantic herring catch monitoring methods is also included.

Dealer Alternative 2 can be found in Section 2.1.2, p. 7 of the Framework 4 Discussion Document. This alternative includes three options, about which APSD has provided comments (see references to Alternatives 2.1.2.1, 2.1.2.2, and 2.1.2.3 in the attached comments). APSD also provided comments about Dealer Alternative 3, which would require third-party catch verification (vessel-based). For reference, this alternative is described in Section 2.1.3, p. 8 of the Framework 4 Discussion Document.

Staff from the NMFS Regional Office will attend the April 3, 2014 Herring Committee meeting to address any further questions that may arise during the Herring Committee's discussion about the Framework 4 alternatives.

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General Comments on Framework 4 to the Atlantic Herring Fishery Management Plan

Alternative 2.1.2.1 in Framework 4 to the Atlantic herring fishery management plan would require vessel confirmation and validation of dealer reports by various means (e.g., SAFIS; Fish on Line). This alternative was first developed through the PDT process several years ago, and since that time NMFS has gone through programmatic changes to address the issues presented in this alternative. The NMFS Analysis and Program Support Division (APSD) Quality Assurance team was established to formalize the data QA/QC processes and identify data issues within and between datasets that are used for monitoring and analysis. A primary function of the QA team is the trip matching of vessel (VTR) and dealer (SAFIS) reports, and subsequent outreach to industry partners to resolve reporting issues. Therefore, Alternative 2.1.2.1 would merely duplicate efforts that NMFS already has in place for addressing data quality issues.

Alternative 2.1.2.2 in Framework 4 to the Atlantic herring fishery management plan would require VTR and dealer reports to be submitted within 24 hours of trip end or purchase, respectively. Herring limited access permit holders are currently required to submit daily VMS catch reports, which include herring kept by herring area and kept of all species by haddock area (Gulf of Maine and/or Georges Bank). For daily monitoring purposes, VMS catch reports are used as a place holder until weekly VTR and Dealer reports are received, entered into the databases, and QCed. NMFS VTR and dealer QC systems cycle on a weekly basis, so increasing the reporting frequency to daily for VTR and dealer would not necessarily result in potential data issues being identified by the QC process on a daily basis. In addition, VTR reports are submitted on a monthly or weekly basis, depending on the fishery. Therefore, adding a 24 hour rule to the VTR reporting mix may increase confusion among vessels that hold permits for multiple fisheries. Thus, this alternative would not improve the timeliness of data quality or availability for these reporting methods.

Alternative 2.1.2.3 in Framework 4 to the Atlantic herring fishery management plan “would require that fish holds on limited access herring vessels are empty before leaving the dock on any trip when declared into the Atlantic herring fishery.” The question we have is, who would verify that the holds are empty? In other words, who would monitor this activity? What regulatory implications would there be? We understood there were industry concerns about injury liability for hold inspectors when a similar concept was proposed for the groundfish sector program and note that as well.

In an attempt to better ensure the accuracy of catch information, Alternative 2.1.3 in Framework 4 to the Atlantic herring fishery management plan would require “...third-party catch verification at the first point of landings on trips by limited access herring vessels carrying a NMFS-approved observer.” Having an observer/sampler measure catch in certified holds may provide NMFS with additional information to compare to VTR/dealer information, but it is not entirely clear how it improves the information. Dealers would still be the best source of landings.

Atlantic Herring Monitoring Methodology

I. Landings Calculations

Atlantic herring landings by area are calculated weekly using VMS catch reports to verify and determine catch when VTR and/or dealer records are unavailable, but VTR and dealer reports inclusive of state-reported landings (from DMIS), once received, are used to determine final catch by area. Data are reconciled where necessary by the APSD QA team prior to compiling weekly and annual reports.

VTR kept amounts are reported as hail weight, with an estimated 10% margin of error, and dealer landings are considered more accurate. Therefore, dealer-reported pounds are used as the default for each trip. However, when the VTR weight is greater than dealer weight by >10%, it is assumed that dealer reports are missing from the database and VTR kept is used in these instances. Finally, total kept reported in the State of Maine VTR log books are added to the data set as Area 1A landings. Vessel-reported kept is assigned to herring management area using VMS catch reports or latitude and longitude coordinates from VTR reports if VMS area is not available. Total kept is then summed by area.

II. Discard Calculations

Discards of Atlantic herring by area are determined using the following formula, where NK = herring unknown:

$$\frac{\text{Observed Atlantic Herring Discards} + \text{Atlantic Herring NK}}{\text{Observed Kept All Species}} \times \text{Vessel Kept All}$$

Only discard and kept all data from observed hauls are used in calculating the discard ratio using data from the Northeast Fisheries Science Center Observer Program databases. Discard ratios are determined for each area and gear type, and then multiplied by vessel kept all by area and gear type. Where VTR data provide a gear type in an area that is not reported on observed trips, vessel kept all are multiplied by the weighted average of the discard ratios for all observed gear types by corresponding area. Estimated discards for all gear types are then summed by area, resulting in a fleet-wide estimate of discards for Atlantic herring.

The same processes described above for landing and discard calculations are used for both in- season monitoring and year-end reports.