



Coalition for the Atlantic Herring Fishery's Orderly, Informed and Responsible Long-Term Development

March 22, 2009

Frank Blount, Chairman
NEFMC Herring Committee
PO Box 3724
33 State Street
Narragansett, RI 02883

RE: Amendment 4 Monitoring

Dear Chairman Blount,

I am writing on behalf of the CHOIR Coalition to offer a couple options for addition to monitoring Alternative 3 (the 'alternative') and to outline what we believe should be the goals and objectives for any dockside monitoring program included in Amendment 4.

Over the last month we have met and discussed the alternative with staff from the NMFS Northeast Regional Office, Northeast Fishery Science Center, the Northeast Fishery Observer Program and the Council, as well as with multiple herring fishermen. In our discussions we came up with a couple ideas that we believe would improve the monitoring system proposed in the alternative.

First, we believe that it would be prudent to include a 'phased-in' option in the alternative. Instead of trying to make all the changes immediately, we agreed that it would be best to make certain changes gradually, over a period of multiple years (likely 3-5 years). For example, instead of converting to an electronic monitoring system in the first year, you could gradually shift from the current use of at-sea observers to a fully electronic system over a period of years. Another example of this phased-in approach would be in terms of caps on dumping; that is, an initial cap could be set that would become more restrictive over time, allowing for fisherman and managers to adjust to the new system.

Second, during our discussions with NERO staff we agreed that included in the alternative should be a trip termination measure in regards to dumping. In other words, if a dumping event occurs, the trip would be terminated. We feel that this measure should be analyzed and possibly included in the alternative.

We also would like to offer potential goals and objectives for any dockside monitoring program that is included in the amendment. We believe the goals and objectives should be as follows:

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Goal:

To provide independently verifiable landed weights for catch, bycatch and incidental catch that allow for effective tracking of Annual Catch Limits (ACLs) and Accountability Measures (AMs).

Objectives:

- To cover all landings events or to cover a sufficient and representative proportion of landings events to allow for fleetwide extrapolation.
- The dockside monitoring program must not make the assumption that landings equal catch unless sufficiently robust measures are in place to monitor all at-sea discards.
- To ensure that landings that are being sampled have not been pre-sorted or that if pre-sorting is occurring, that all pre-sorted catch is shown to an observer. (How a vessel would do this would be outlined in its Catch Monitoring and Control Plan.)
- To ensure that there is a system of weighing landings that is independently certifiable.
- To ensure that the dockside monitoring program is mandatory, not voluntary.
- To implement a landings composition sampling technique that is based on NFOP protocols.
- To ensure that all dockside monitoring providers- including state agencies, 3rd party contractors, etc- must all be certified according to NMFS standards and must turn data over to NMFS in real time (or as close to real time as possible) so that it can be used by managers in an effective way.

It is important for the dockside monitoring system in this amendment to be done properly, otherwise it will be a waste of time and money and we will end up right where we started. We believe the goals and objective outlined above would help us get to a system that works.

Thanks for your time,



Steve Weiner, Chair