



#5a

February 5, 2009

**VIA ELECTRIC MAIL**

Mr. Paul J. Howard, Executive Director  
 New England Fishery Management Council  
 50 Water Street, Newburyport, MA 01950

**RE: PROPOSED ATLANTIC HERRING MONITORING ALTERNATIVES**

Dear Mr. Howard:

I write today on behalf of the Herring Alliance to outline at-sea monitoring measures that are essential to meet the goals of Amendment 4.

The herring committee has recommended several important alternatives and options for analysis, however, so far has not included a well developed package of measures that would address at-sea monitoring. The measures below could form the basis of an additional monitoring alternative, or they could be applied to any of the existing proposed alternatives that deal with at-sea monitoring.

The monitoring program being designed by the council should apply to Category A & B limited access herring vessels. Limiting the monitoring program to Category A & B vessels will cut down on the complexity and cost of the program while ensuring that data is captured from the vast majority of the catch.

The following measures should be included in all alternatives that incorporate at-sea monitoring.

**A. Goals and Objectives for at sea monitoring**

We urge the council to include clear goals for the monitoring program that focus on the essential outcomes of high quality monitoring. These should include:

1. Supporting real-time quota monitoring through rapid analysis and dissemination of data.
2. Providing high quality estimates of catch for implementation of annual catch limits and accountability measures (adequate sampling of tows, trips, areas, and seasons).<sup>1</sup>
  - o high quality estimates of target catch (i.e., Atlantic herring).
  - o high quality estimates of catch of other managed stocks for quota monitoring.

**- CONTINUED ON REVERSE -**

<sup>1</sup> In addition to achieving an acceptable minimum variance (e.g., CV < 20%) for each of a suite of selected species (e.g., Atlantic herring, river herring, haddock) across tows (within areas and time periods), it is also important to achieve representative sampling of the individual tows with a similarly acceptable variance. That is, the monitoring protocols need to ensure that a specified minimum variance is achieved for each of a suite of selected species among the samples from a single tow (based on the all the basket samples from one tow, and some appropriate accounting of pre-sorted or discarded catch). Attention should also be given to analyzing the detection probabilities for important bycatch species under different sampling regimes. In this fishery the tows can be enormous (e.g., over 100 tons) and it is important to increase confidence in the estimated composition of individual tows to ensure that the impacts of these large tows are well understood.

3. High quality estimates of all bycatch so as to help reduce bycatch.
  4. Heightened criteria and monitoring standards for any fishing within closed areas.
- B. All trips that carry observers must require
- Systematic sampling of pumped catch, representative of entire tow
  - Complete record of pre-sorted catch
  - Complete record of residual catch in cod end after pumping
  - Total weight of haul with 10% resolution (i.e., weight of all catch before sorting or pumping)
  - Total weight of fish pumped into the hold with 10% resolution
- C. Observers supported by electronic monitoring equipment  
Trained observers will have access to digitally recorded data to augment their catch sampling. This includes:
- Pressure-sensitive net sensors for estimating total weight of each haul (SIMRAD PI Catch sensors, or comparable system)
  - Digital record of trip, tow, location of net above sea floor
  - Video records of deck activities on all vessels for ensuring full accounting of pre-sorted catch
  - Electronic notebooks for data recording
- D. Accountability for tows discarded without sampling (i.e., slipped bags)  
Measures must be in place to ensure that catch is not discarded at sea without sampling by observers. The following measures are recommended:
- Up to 3 discarded tows (full or partial) allowed per fishing year to mitigate verified safety emergencies.
  - Fishing suspended for 48 hours for any discarded or transferred tow, whether there is a verified safety issue or not.
  - Full weight of discard will count against the annual herring catch allocation for the management unit; weight assumed to be 200 tons in the absence of the required electronic weight.
- E. Accountability for transfer of tows without sampling (e.g., to other vessel)
- Fishing suspended for 48 hours for any vessel transferring a tow without sampling.
  - Full weight of transfer will count against the annual herring catch allocation for the management unit; weight assumed to be 200 tons in the absence of the required electronic weight.
- F. Accountability for discarding pre-sorted catch without observation  
In the event that crew do not set aside all pre-sorted catch for observer analysis, as detected through the video verification process:
- Fishing suspended for 48 hours for the vessel
  - Vessels that repeatedly discard pre-sorted catch will be excluded from the fishery for the season.

The herring committee has voted to include a Herring Alliance alternative for analysis that deals with monitoring and access to groundfish closed areas and we commend this decision. The Herring Alliance urges the NEFMC to add the at-sea monitoring measures described here either as an additional alternative or as a component to all alternatives that create an at-sea monitoring program. These measures will help to ensure that an at-sea monitoring system is effective in determining catch (landings plus discards) and bycatch of non-target species (including marine mammals).

Sincerely,



Peter Baker, Director  
Herring Alliance  
[www.herringalliance.org](http://www.herringalliance.org)  
(508)641-4064  
[pbaker@herringalliance.org](mailto:pbaker@herringalliance.org)

Herring Alliance  
1632 Orleans Road Harwich, MA 02645  
[www.herringalliance.org](http://www.herringalliance.org) | [PewTrusts.org](http://PewTrusts.org)  
A Project of the Pew Environment Group