



Mid-Atlantic Fishery Management Council
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MEMORANDUM

Date: November 26, 2019
To: Chris Moore, Executive Director
From: Karson Coutre, Staff
Subject: Commercial eVTR Omnibus Framework Final Action

On Wednesday, December 11, the Council will take final action on the Omnibus Framework to consider requiring electronic vessel trip reporting (eVTR) for commercially permitted vessels. This is a joint action with the New England Fishery Management Council (NEFMC).

Meeting Materials listed below are provided for the Council's discussion of this agenda item:

- 1) This memo, including the decision point and staff recommended alternative
- 2) Commercial eVTR Omnibus Framework (*draft as of November 26, 2019*)
- 3) Fishery Management Action Team meeting summaries (*October 25 and May 10, 2019*)
- 4) Advisory Panel meeting summary (*July 23, 2019*)
- 5) Public Meeting summary (*November, 20, 2019*)
- 6) Public comments (*received between April 11 and November 26, 2019*)

Decision Point

Select a MAFMC preferred alternative for commercial eVTR requirements and corresponding reporting deadline. The NEFMC will select their preferred alternative at their Council Meeting in January 2020.

Staff Recommendation

Staff recommend alternative 1e, which would require that VTRs be submitted electronically with a weekly deadline following the completion of a fishing trip. Weekly reporting is defined as

submission by midnight of the Tuesday following the reporting week (Sunday through Saturday). Requiring eVTRs will increase the quality and timeliness of VTR data while reducing the reporting redundancies for vessel owners and operators. Electronic reporting is a crucial step in moving the Greater Atlantic region towards one stop shop reporting. This alternative unifies the reporting deadline for all commercial permit holders in the Greater Atlantic region to weekly. Currently, reporting deadlines vary from weekly to monthly across commercial permit types in the Mid-Atlantic and New England regions. Operators are currently required to have a VTR filled out with all required information, except for information not yet ascertainable, prior to entering port. Once they sell their catch to a dealer, the VTR can be completed and submitted. Many commercial operators that submitted electronically in 2018 did so within 24 hours after the fishing trip ended, however some fishing ports do not have Wi-Fi available for immediate eVTR submission. Based on FMAT and AP discussion during action development, staff believe that a weekly reporting timeframe is sufficient for management needs, aligns with electronic dealer reporting, and provides vessel operators time to review data entry, correct errors, and reach an area with internet connection or cellular data to submit their report. Operators holding commercial permits for Squid, Atlantic Mackerel, Butterfish, Surfclam, Ocean Quahog (MAFMC managed), Atlantic Herring, and Northeast Multispecies (NEFMC managed) are already required to report weekly, therefore, under this alternative their reporting method would change to electronic, however their reporting deadline would remain *status quo*.



New England
Fishery Management
Council



MID-ATLANTIC
FISHERY MANAGEMENT COUNCIL

Regulatory Omnibus Framework Adjustment to Modify Reporting Requirements for Electronic Vessel Trip Reports (eVTRs) by Commercial Vessel Operators Holding Federal Permits for Species Managed by the MAFMC and NEFMC

Joint Action

(Draft as of 11/26/2019)

Prepared by:

**Mid-Atlantic Fishery Management Council (MAFMC) in collaboration with the
New England Fishery Management Council (NEFMC) and the
National Marine Fisheries Service (NMFS)**

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2 Introduction

Commercial fishing vessels with federal permits for Mid-Atlantic Fishery Management Council (MAFMC) and New England Fishery Management Council (NEFMC) managed species are required to submit Vessel Trip Reports (VTRs) documenting all fishing activity and catches. Electronic Vessel Trip Reports (eVTRs), which allow direct entry of data by the vessel operator using an electronic device, have been available as an option for all Greater Atlantic Region federally permitted fisheries since 2013. Electronic submission of VTRs has been required for vessels with Federal for-hire permits for species managed under MAFMC Fishery Management Plans (FMPs) since March 12, 2018. According to Greater Atlantic Regional Fisheries Office (GARFO), “A well-designed eVTR program or application has the ability to significantly reduce the amount of time required for a vessel operator to comply with their VTR reporting requirements by eliminating the need to fill out redundant information (e.g., vessel permit, registration, gear type).” Requiring electronic submission would be intended to increase the timeliness and accuracy of fisheries data submitted to NMFS while also reducing the burden on the commercial fishing fleet.

Due to the administrative nature of the regulations that would result from the proposed action, this action is categorically excluded from the requirement to prepare an environmental assessment, in accordance NOAA Administrative Order 216-6. The proposed action is a change to a regulation which does not result in a substantial change in any of the following: Fishing location, timing, effort, authorized gear types, access to fishery resources or harvest levels.

3 Purpose and Need for Action

3.1 Purpose of the Action

The purpose of this action is to require commercial vessels with Federal permits for species managed by the Council to submit currently required VTRs to NOAA through electronic means and change the VTR reporting deadline to 24/48/72 hours/weekly (see alternatives) after entering port at the conclusion of the trip. This action does not change any other existing requirements associated with VTRs but would be an administrative modification in the method and timing for submitting VTRs.

3.2 Need for the Action

This action is needed to: 1) increase the timeliness (availability) of data submitted through VTRs; 2) reduce the reporting burden on data providers (commercial vessel operators) by eliminating the need for paper-based reporting, and; 3) increase the accuracy and quality of data by reducing recall bias associated with delayed completion and submission of paper forms. According to NOAA Fisheries, “electronic reporting will make the collection of important data on fishing vessel activity more efficient, convenient, and timely” for fishery managers, and other data users. Transitioning to electronic reporting is a crucial step in transitioning to more consolidated reporting.

3.3 Timeline for Action

This action was initiated by the MAFMC in December 2018 with the approval of the 2019 Implementation Plan. A Fishery Management Action Team (FMAT) was formed and held meetings on March 19, 2019 and May 10, 2019. Consultation with the MAFMC's Advisory Panels and interested public occurred on March 25, 2019. Framework meeting 1 occurred during the MAFMC meeting on April 10, 2019 in Avalon, NJ. In June 2019, the NEFMC initiated a joint action with the MAFMC to include all their species along with the two jointly managed plans, spiny dogfish and monkfish. Another Advisory Panel meeting occurred on July 23, 2019 via webinar. Framework meeting 1 for the NEFMC occurred in September 2019. An evening public meeting via webinar was held November 20, 2019 to provide a demo of two eVTR applications and information before final action. MAFMC's Framework meeting 2 with the intent of final action will occur at the December 2019 Council meeting and the NEFMC will take final action in January 2020. If the Councils select to require electronic reporting, NMFS indicated that they would have an extended implementation deadline of up to a year after the final rule for adequate preparation and training for software developers, managers, and affected users.

4 Background

In 1992, NOAA Fisheries began mandating reporting of catch, landings, and trip information through Vessel Trip Reports (VTRs) for federally permitted vessels holding summer flounder permits. This requirement was expanded during 1994-96 to include all vessels with federal fishing permits. In 2004, mandatory electronic reporting by federally permitted dealers was implemented for almost all federally managed species. Requirements for weekly reporting were implemented in 2010 for fisheries under catch shares, with weekly reporting later expanded to herring, mackerel, surf clam/ocean quahog IFQ fisheries. In July 2011, the NOAA Fisheries Greater Atlantic Regional Fisheries Office (GARFO) approved the use of electronic reporting of VTRs on a limited, voluntary basis for a segment of the groundfish fleet, and in 2013 for all vessels issued a Federal Northeast fishing permit. In 2018, mandatory electronic submission of VTRs was implemented for party/charter vessels with permits for MAFMC managed species.

4.1 Summary of Current Reporting Regulations

Under current VTR regulations, commercial operators must submit a separate VTR for each chart area, gear type, and/or mesh size fished, potentially requiring multiple paper forms for a single trip. Owners and operators are required to submit a VTR for every commercial, party, or charter trip taken, regardless of where they fish (state or federal waters) or what they catch. VTR submission deadlines are not consistent across MAFMC and NEFMC managed commercial permits, with some plans reporting weekly and others reporting monthly (Table 1), and operators with multiple permits are held to the permit with the strictest reporting requirements. Operators must have a trip report filled out with all required information, except for information not yet ascertainable, prior to entering port.

Table 1. Greater Atlantic Region Federal VTR Requirements by vessel permit type. Table retrieved from GARFO Vessel Trip Report (VTR) Reporting Instructions.

Permit Type	Frequency of Reporting	Reporting Deadline
If a vessel is issued a Party/Charter permit for: *Summer Flounder; *Scup *Black sea bass *Bluefish *Squid/Atlantic mackerel/Butterfish *Tilefish	Then the owner/operator must electronically submit trip reports within 48 hours of landing for all Party/Charter trips regardless of species targeted.	Reports must be electronically submitted using an approved eVTR reporting application within 48 hours of landing. This requirement applies to all Party/Charter trips regardless of species targeted otherwise use the below guidance.
If a vessel is issued a permit for: *Atlantic herring; *Atlantic mackerel; *Illex squid; *Longfin squid/butterfish; *Northeast multispecies; *Ocean quahogs; *Surfclams	Then the owner/operator must submit trip reports weekly	Reports must be postmarked or received by midnight of the Tuesday following the reporting week (Sunday through Saturday). If a trip starts in one week, and offloads in the next, it should be reported in the week the catch was offloaded.
If a vessel is issued a permit for: *Atlantic bluefish *Atlantic deep-sea red crab *Atlantic sea scallop *Black sea bass *Monkfish *Northeast skate *Scup *Spiny dogfish *Summer flounder *Tilefish	Then the owner/operator must submit trip reports monthly	Reports must be postmarked or received within 15 days of the end of the month. If a trip starts in one month, and offloads in the next, it should be reported for the month in which the catch was offloaded
If a vessel is issued a permit for American lobster and no other Greater Atlantic Region vessel permit	Then the owner/operator is not required to submit trips reports (check with your state, which may require reporting).	

With the advent and ubiquitous availability of high-speed internet, paper forms are no longer the most efficient method for permit holders to submit the required information, nor for NOAA Fisheries to process it. As previously stated, NOAA Fisheries considers that electronic reporting “will make the collection of important data on fishing vessel activity more efficient, convenient, and timely” for fishery managers and other data users. At present, paper-based reports often create a substantial time delay between the time when fishing activity occurs and when the data

are available to fisheries managers (Figure 1 and Figure 2). Reports may not be mailed (or faxed) to NOAA Fisheries for up to six weeks after the fishing activity occurs (if regulations are followed). Following receipt of paper forms, data must be entered into the system and checked for anomalies and errors (creating further delay if contact must be made with the operator for clarification or correction). Paper reports may also suffer from illegible handwriting or messy forms that further impede accurate data entry.

4.1.1 Electronic Reporting

Electronic submission of VTRs has been authorized for all Northeast Region federally permitted vessels and approximately 10% of commercial VTRs in the Greater Atlantic region were submitted electronically in 2018. While eVTRs still require reporting of fishing activity in each area fished, eVTRs eliminate the paper associated with such reporting and ease the reporting associated with multiple areas. With eVTR, additional effort and catch records for each area and/or gear/mesh fished can be added instead of filling out multiple reports. Additionally, vessel operators may be faced with duplicate reporting if they are fishing in another region or for a species that also requires reporting through a separate system. Several states also require reporting from vessels with information that is identical, or similar, to that provided through VTRs. As electronic data entry by vessel operators is established, application providers such as GARFO and ACCSP are working towards “one-stop shop” reporting. For example, ACCSP’s eVTR application eTrips/Mobile has been designed to send reports to GARFO and SERO to fulfill a dual permit holder’s reporting requirement. Electronic submission of VTRs eliminates the need for operators to physically mail in paper forms, and once an eVTR is successfully submitted, it is available in GARFO’s VTR database nearly instantaneously.

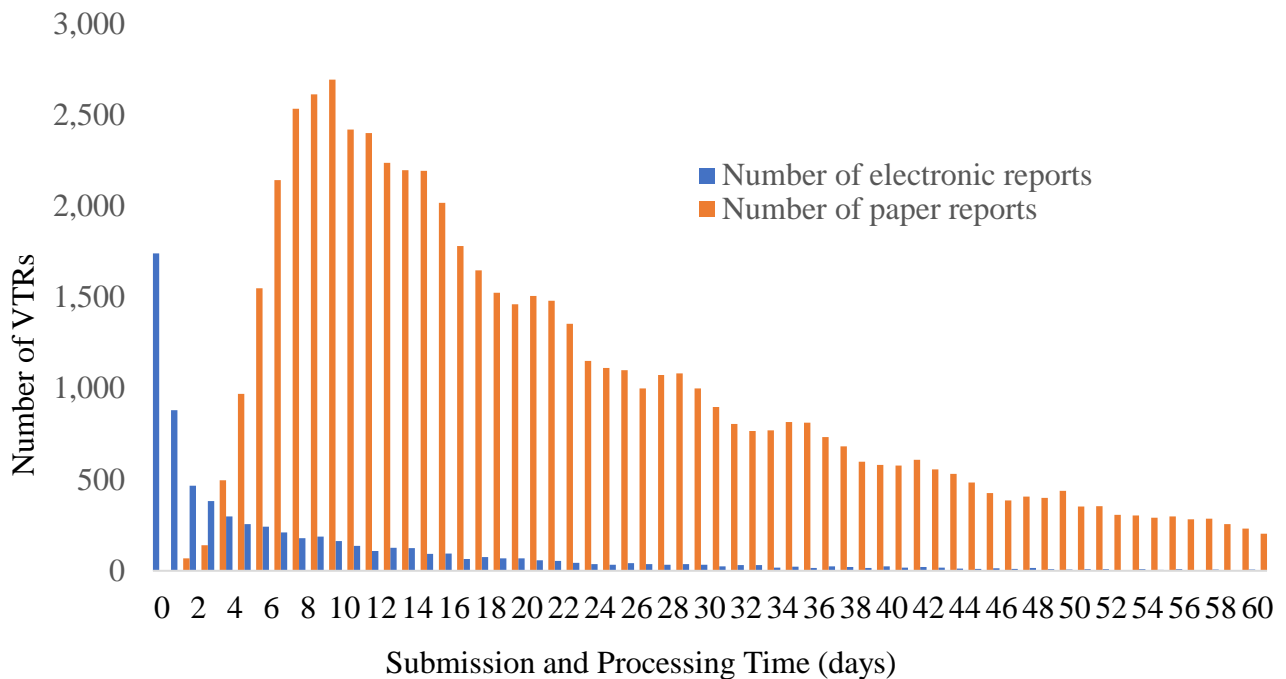


Figure 1. Commercial VTR submission time frequency distribution, January-December 2018. Submission time is the number of days between trip completion and the arrival of the VTR into GARFO’s VTR database. Through eVTR, this process is nearly instantaneous once the user submits the eVTR through their selected application. Paper reports need to be scanned and entered into the database after received by GARFO.

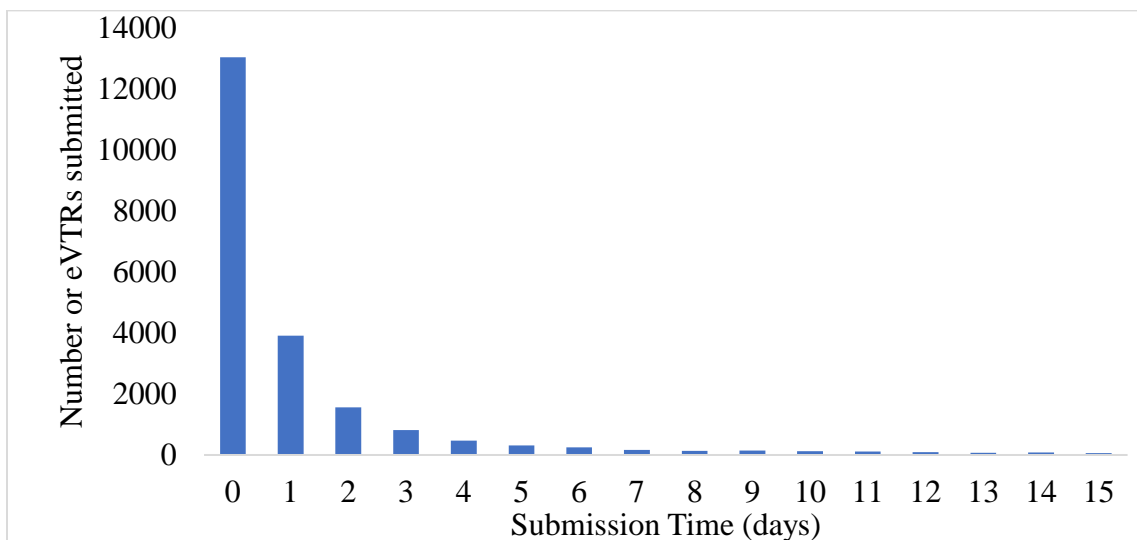


Figure 2. For-hire eVTR submission time frequency distribution from April-December 2018. Submission time is the number of days between trip completion and the arrival of the VTR into GARFO’s VTR database. Through eVTR, this process is nearly instantaneous once the user submits the eVTR through their selected application. The for-hire sector is included for informational purposes as they will not be impacted by this action.

There are several options currently available for submitting eVTRs outlined in Tables 2 and 3, below. Operators have a choice of which NMFS-approved eVTR application to use and can switch at any time. Additional systems may be developed and, upon approval by NOAA for submitting VTRs, would be added to this list. All eVTR applications provide the ability for reports to be completed at sea and saved on the computer/tablet for submission at a later time.

Table 2. Free NMFS-approved eVTR applications and compatible devices. These applications are maintained at no cost to the user and cover all common types of electronic devices.

Application (provider)	Compatible Devices
eTrips Mobile v1 and v2 (ACCSP)	Windows computer, Android, Windows, and Apple smartphones or tablets
eTrips Online (ACCSP)	Web browser
Fish Online (GARFO)	iPhone/iPad
FLDRS (NEFSC) ^a	Windows computer
Elog (Ecotrust) ^b	Windows computer, iPhone, Windows tablet

^a FLDRS is a program to collect high resolution fisheries data for research that also satisfies eVTR requirements

^bThis program is currently used by a small number of vessels which are all involved in electronic monitoring

Table 3. NMFS-approved eVTR applications^a that charge fees and compatible devices. These applications generally have installation fees and monthly or annual fees.

Application (provider) ^a	Compatible Devices
FACTS (Electric Edge)	Windows computer
DDL (Olrac)	Web browser, Windows computer, Windows tablet

^a As of 11/19/2019 these applications were listed as “pending recertification” by NMFS on their eVTR webpage: <https://www.fisheries.noaa.gov/new-england-mid-atlantic/resources-fishing/vessel-trip-reporting-greater-atlantic-region>.

4.2 Users Affected

This joint omnibus framework will affect all vessels with Federal commercial permits for species managed by the MAFMC (Atlantic bluefish, black sea bass, scup, summer flounder, tilefish, squid, Atlantic mackerel, butterfish, surfclam, ocean quahog, spiny dogfish) and the NEFMC (Atlantic herring, northeast multispecies, Atlantic deep-sea red crab, Atlantic sea scallop, monkfish, and northeast skate). If a vessel holds a permit for American lobster and no other Greater Atlantic Region vessel permit, they are not required to submit VTRs and will not be affected by this action. This action does not consider any changes to VTR requirements for the recreational for-hire sector.

The permit holder and VTR information described in tables 4-8 were reported by GARFO and accessed on 11/25/2019. The NEFMC and MAFMC are taking joint action due to the high degree of overlap in permit holders between regions and the joint management of dogfish and

monkfish. Table 4 describes this permit holder overlap between regions while tables 5-8 represent information across both regions combined.

Table 4. Permit holder numbers for vessels issued a MAFMC or NEFMC commercial permit in 2018 (data accessed 11/25/2019). Dogfish permit holders were included in the MAFMC permit numbers and Monkfish permit holders were included in NEFMC permit numbers.

Summary of Affected Users	2018
# of vessels issued a MAFMC commercial permit	2,726
# of the above vessels that submitted VTRs for commercial trips	1,648
# of vessels issued a NEFMC commercial permit	2,723
# of vessels issued both a MAFMC commercial permit and NEFMC commercial permit	2,520
# of MAFMC or NEFMC commercial permit holders	2,929
# of above vessels that submitted VTRs for commercial trips	1,723

Table 5. Number of paper and electronic commercial VTRs submitted in 2018. VTR numbers were reported by GARFO for vessels issued a MAFMC or NEFMC commercial permit in 2018.

# of Commercial VTRs Submitted in 2018	
Paper	73,132
Electronic	7,727

Table 6. The estimated number of MAFMC and NEFMC permitted vessels that submitted eVTRs in 2018 summarized by application provider. The for-hire sector shows overall higher application use due to their regulatory requirement of electronic submission starting in March 2018. The for-hire sector is included below for informational purposes and will not be impacted by this action. Note that the some eVTR reporting applications have been available for multiple years while others are more recently developed, impacting the number of users.

Provider (app)	For-hire		Commercial	
	VTRs	Vessels	VTRs	Vessels
ACCSP (eTrips/Mobile)	16,351	292	1,065	81
GARFO (Fish Online)	6,847	141	760	44
NEFSC (FLDRS)			5,750	92
ECOTRUST (Elog)			152	7

Table 7. Proportion of all commercial VTRs for each gear type that were submitted electronically in 2018. VTR numbers were reported by GARFO for vessels issued a MAFMC or NEFMC commercial permit in 2018.

Gear Type	% eVTR
Trawl	15%
Pot/Trap	4%
Gill net	19%
Dredge	4%
Hand line/ Rod and Reel	20%
Longline	10%
Other	14%

Table 8. Proportion of all commercial VTRs for each state that were submitted electronically in 2018. VTR numbers were reported by GARFO for vessels issued a MAFMC or NEFMC commercial permit in 2018.

Landing State	% eVTR
ME	9%
NH	21%
MA	10%
RI	16%
CT	12%
NY	7%
NJ	4%
DE	0%
MD	1%
VA	1%
NC	1%

4.2.1 Implementation Considerations

Trainings on how to use eVTR applications will be conducted in-person throughout the geographic range of affected users and via webinar. Demos of the most popular free apps will be recorded and made available on the MAFMC eVTR webpage. After final action, 4-7 in-person workshops in the Mid-Atlantic and New England regions will be held with the help of industry liaisons. More workshops/webinars will be planned and conducted as needed. Resources will be compiled from application providers and made available on the Council website. Any video-based training provided by software providers will also be posted to the Council’s website. NMFS indicated that they would have an extended implementation deadline of up to a year after the final rule for adequate preparation and training for software developers, managers, and affected users.

5 Proposed Management Measures and Alternatives

Alternative 1: Modify administrative requirements to require commercial fishing vessels with Federal permits for MAFMC and NEFMC managed species to submit VTRs through electronic means.

There are multiple sub-options under alternative 1 that address different reporting deadlines for eVTR submission, with alternatives 1b-1e unifying the reporting deadline across MAFMC and NEFMC-managed commercial FMPs (current reporting deadlines by species are summarized in Table 1). None of the options under alternative 1 would change any of the requirements for data elements that are currently reported through paper based VTRs. Due to the electronic accessibility of VTR information to managers and law enforcement, copies of VTRs would no longer be federally required to be retained for 1 year on board the vessel and 3 years after the date the fish were last possessed, landed, and sold.

Because this proposed action deals entirely with the administrative mechanisms by which commercial fishing vessel permit holders submit reports, the alternative would not result in a substantial change in any of the following: Fishing location, timing, effort, authorized gear types, access to fishery resources or harvest levels. Therefore, there would be no impacts from the proposed action on any fishery resources or habitat managed under a Council FMP, or on any associated protected resources.

Alternative 1a: Reports will be required to be submitted electronically with no change to reporting deadline.

This alternative addresses the need for action by requiring eVTR, however it would not unify reporting deadline requirements across commercial permit holders or increase the timeliness of data availability to the same extent as alternatives 1b-1e. For current reporting deadlines, see Table 1 in section 4.1.

Alternative 1b: Reports will be required to be submitted electronically within 24 hours following the completion of the fishing trip.

This alternative changes the NOAA-mandated reporting deadlines from the current requirement (either the Tuesday following the reporting week or the 15th of the month following the reporting month depending on the species fished; see Table 1) to 24 hours after the fishing trip is completed. This alternative would unify the reporting deadline across MAFMC and NEFMC managed commercial FMPs and further expedite data availability for fisheries management purposes. Since all eVTR applications provide the ability for reports to be completed at sea and saved on the electronic device, reports should be ready for submission upon reaching the dock since under current regulations they must be completed prior to entering port. The 24-hour period is to provide vessel operators time to review data entry, correct any errors, and have time to reach an area with internet connection or cellular data to submit their report.

Alternative 1c: Reports will be required to be submitted electronically within 48 hours following the completion of the fishing trip.

Similar to alternative 1b, this alternative would change the reporting deadlines, with alternative 1c requiring submission within 48 hours after completion of a trip. A 48-hour eVTR reporting

deadline is already in place for the MAFMC for-hire sector so this alternative would unify reporting deadlines across all MAFMC FMPs and commercial NEFMC FMPs.

Alternative 1d: Reports will be required to be submitted electronically within 72 hours following the completion of the fishing trip.

Similar to alternatives 1b and 1c, this alternative would change the reporting deadlines, with alternative 1d requiring submission within 72 hours after completion of a trip.

Alternative 1e: Reports will be required to be submitted electronically weekly following the completion of the fishing trip.

Similar to alternatives 1b-1d, this alternative would change the reporting deadlines, with alternative 1e requiring submission by midnight of the Tuesday following the reporting week (Sunday through Saturday). Operators holding permits for Squid, Atlantic Mackerel, Butterfish, Surfclam, Ocean Quahog (MAFMC managed), Atlantic Herring, and Northeast Multispecies (NEFMC managed) are already required to report weekly, therefore, under this alternative their reporting deadline would remain *status quo*. This alternative would also unify the reporting deadline across MAFMC and NEFMC managed commercial FMPs and commercial dealers.

Alternative 2: No Action, *status quo*.

Under this alternative, VTRs would continue to be submitted by paper or optionally through an approved eVTR application. This *status quo* would perpetuate the delay of the availability of VTR data for managers and the burden on permit holders to fill out and maintain paper VTR records. Continued use of paper VTRs would not facilitate the development of integrated systems with state agency partners and other federally mandated reporting programs to provide a single point of data entry by permit holders to satisfy multiple reporting requirements, thus indefinitely continuing the burden of multiple reporting requirements for some users. The continued use of paper VTRs would necessitate the maintenance of administrative resources to accept, process, and manage paper forms.

6 Impacts of the Proposed Action and Alternatives

As described below, this action is administrative in nature and will not result in a substantial change in any of the following: Fishing location, timing, effort, authorized gear types, access to fishery resources or harvest levels. As such, it qualifies for a categorical exclusion from NEPA requirements to conduct an Environmental Assessment (EA) or Environmental Impact Assessment (EIS)

6.1 Impacts on Fishery Resources (including non-Target species)

Because the alternatives deal entirely with the administrative mechanisms by which Federal permit holders in Council-managed commercial fisheries would report currently-required VTRs, and would not affect fishing vessel effort, operations, species targeted, or areas fished, there would be no direct impacts of the proposed action on any fishery resources managed under Council FMPs. This action may have indirect, low (not significant, individual or cumulative) positive impacts on the management capabilities for fishery resources by improving data available to fishery scientists and managers. There are no differences between the alternatives as

far as direct impacts on fishery resources. Alternatives 1b-1e are more likely to produce improved data compared to alternatives 1a and 2 due to the reduction of reporting lag.

6.2 Impacts on Habitat

Due to the administrative nature of the measures under consideration, there would be no impacts on habitat, including essential fish habitat (EFH). The alternatives would not result in a substantial change in any of the following: Fishing location, timing, effort, authorized gear types, access to fishery resources or harvest levels. There are no differences between the alternatives as far as impacts on habitat/ EFH.

6.3 Impacts on Protected Resources

Similar to the impacts on habitat, due to the administrative nature of the measures under consideration, there would be no impact on protected resources. The alternatives would not result in a substantial change in any of the following: Fishing location, timing, effort, authorized gear types, access to fishery resources or harvest levels. There are no differences between the alternatives as far as impacts on any protected resources.

6.4 Economic Impacts

Table 2 summarizes the free NMFS-approved eVTR applications and compatible devices. Complying with eVTR submission requirements (Alternative 1) can be accomplished for no cost under multiple scenarios. For example, a user who has a smartphone, tablet or laptop and access to internet or cellular data can use one of the approved free applications to submit their eVTRs. The ubiquitous nature of electronic devices, cellular data, and internet availability in private homes and businesses, as well as free access to internet in public libraries and other locations, provides a free to minimal cost means for permit holders to access electronic submission of VTRs.

Stakeholders will only need to purchase a device if they do not already have any of the compatible electronic devices or are unable to take them on their vessel. Low-cost portable electronic devices such as WiFi-capable tablets can be purchased for \$75-130. Although a free or low-cost option is available, users may voluntarily choose a different reporting mechanism, additional services, or upgraded hardware options that would increase their costs to varying degrees at their discretion.

In addition to the free options, NOAA-approved systems encompass a range of subscription fees and/or equipment costs (Table 9). Not all vendors of NOAA-approved systems provided exact pricing structures (or are only able to provide approximate anticipated pricing) since their business models were built around bulk sales to cover many users in entire fisheries (or sales of complete systems to organizations and government agencies).

Table 9. Minimum costs for various NOAA-approved eVTR systems and necessary equipment.

eVTR System	Software cost	Minimum equipment cost	Optional additions cost	Notes
eTrips mobile	\$0	If user has smartphone or tablet: \$0	Waterproof case: \$15-100	Assumes access to Wi-Fi within reporting deadline if no data plan is used
Fish Online				
DDL	\$500/year	Wi-Fi capable tablet: \$70-\$130	Low cost cellular data plan: \$15/month	
FACTS	Unknown			
eLog	Included as part of electronic monitoring service			
FLDRS	\$0	Windows Laptop: \$150		Available to those already using it, those participating in NEFSC study fleet, and those needing to report from the ocean quahog and clam fishery
Note: All costs are approximate and reflect lower cost options from multiple retailers/providers researched November 2019. Higher end equipment and data plans are available and likely vary by area.				

There may be minor and temporary increased reporting burden as permit holders transition to electronic submission, but in the long run electronic submission should reduce reporting burden because reports can be pre-configured with lists of favorites and some data fields automatically filled-in. As these applications progress, electronic reporting can help reduce duplicate reporting because the reporting applications can be configured to submit data to multiple agencies. The ability to use electronic reporting programs also eliminates the time and cost of mailing in paper forms.

The ability to use electronic reporting programs to automatically fill in some reporting fields may reduce the reporting burden and save time and cost over mailing in paper forms.

In the long term, government resources for administering this program are expected to be reduced resulting from efficiencies gained in data processing. Individual VTRs would not need to be manually scanned and error checked. There were 73,132 paper VTRs submitted by commercial permit holders in 2018 and each one was scanned and entered into the database. If there are errors, managers must mail VTRs back to operators. In time, the paper forms would no longer be printed and mailed. Further, improved and expedited availability of the data is

expected to expand the utility of the data currently collected to fisheries management, research, and law enforcement purposes.

7 Consistency with Applicable Laws

7.1 Magnuson-Stevens Fishery Conservation and Management Act

7.1.1 Compliance with the National Standards

National Standard 1. Conservation and management measures shall prevent overfishing while achieving, on a continuing basis, the OY from each fishery for the U.S. fishing industry.

The proposed action is limited to a modification of the mechanisms by which federally permitted commercial owners/operators report their fishing activity. The management measures associated with this action would have no direct impacts on overfishing or obtaining optimum yield in any fishery. However, the proposed action should provide higher resolution and more timely data on fish landings and effort, which should assist conservation and management.

National Standard 2. Conservation and management measures shall be based upon the best scientific information available.

The analyses conducted in support of the proposed action were conducted using information from the most recent complete year, 2018. The data used in the analyses provide the best available information on the number of federally permitted vessels in New England and the mid-Atlantic, the number of vessels submitting VTRs, the number of VTRs submitted by those vessels, and the extent of use of electronic VTRs.

National Standard 3. To the extent practicable, an individual stock of fish shall be managed as a unit throughout its range, and interrelated stocks of fish shall be managed as a unit or in close coordination.

The proposed action has no effect on the management units of any stocks of fish included in a Mid-Atlantic FMP.

National Standard 4. Conservation and management measures shall not discriminate between residents of different states. If it becomes necessary to allocate or assign fishing privileges among various U.S. fishermen, such allocation shall be: (1) Fair and equitable to all such fishermen. (2) Reasonably calculated to promote conservation. (3) Carried out in such manner that no particular individual, corporation, or other entity acquires an excessive share of such privileges.

The proposed action does not allocate or assign fishing privileges among various U.S. fishermen. The management measures associated with the proposed action would apply equally to all federally permitted commercial vessels in the Mid-Atlantic, regardless of the state in which they operate.

National Standard 5. Conservation and management measures shall, where practicable, consider efficiency in the utilization of fishery resources; except that no such measure shall have economic allocation as its sole purpose.

Improving the efficiency of the submission of VTRs by commercial operators and the processing of the resulting data by NOAA Fisheries is the primary objective of this action. The intent is that this action would also improve the efficiency of NOAA Fisheries in monitoring and managing all fisheries. Economic allocation was not a factor in the development of this action, nor of the selection of the proposed action from among the alternatives.

National Standard 6. Conservation and management measures shall take into account and allow for variations among, and contingencies in, fisheries, fishery resources, and catches.

The proposed action has no direct impact on any fishery, fishery resource, or catch. Variations among, and contingencies in, fisheries, fishery resources, and catches were considered to the extent that the development of the proposed action addressed the ways in which these variations and contingencies affect commercial operators and their submission of VTRs, and the use of resulting landings data by NOAA Fisheries and cooperating state fishery management agencies.

National Standard 7. Conservation and management measures shall, where practicable, minimize costs and avoid unnecessary duplication.

By providing several options for how federally permitted commercial operators may report their VTRs including free applications, NOAA Fisheries has strived to minimize the costs to commercial operators associated with complying with the proposed action.

National Standard 8. Conservation and management measures shall, consistent with the conservation requirements of the Magnuson-Stevens Act (including the prevention of overfishing and rebuilding of overfished stocks), take into account the importance of fishery resources to fishing communities in order to: (1) Provide for the sustained participation of such communities; and (2) To the extent practicable, minimize adverse economic impacts on such communities.

None of the measures in the proposed actions are likely to diminish in any way the sustained participation of any fishing community. The economic impacts of the proposed action on fishing communities is minimized by the nature of the action itself: The proposed action applies only to commercial operators, and only on the mechanisms and frequency by which they report their fishing activity. There are no measures proposed that would directly affect fishing harvest.

National Standard 9. Conservation and management measures shall, to the extent practicable: (1) Minimize bycatch; and (2) To the extent bycatch cannot be avoided, minimize the mortality of such bycatch.

The proposed action has no bearing or relevance regarding the minimization of bycatch, as it is concerned solely with the administrative mechanisms by which federally-permitted commercial operators in the Mid-Atlantic report fishing activity to NOAA Fisheries.

National Standard 10. Conservation and management measures shall, to the extent practicable, promote the safety of human life at sea.

The proposed action is focused entirely on the administrative mechanisms by which federally-permitted for-hire operators in the Mid-Atlantic report fishing activity to NOAA Fisheries. The safety of human life at sea is not affected by this action.

7.1.2 Compliance with Other Requirements of the Magnuson-Stevens Act

Section 303 of the Magnuson-Stevens Act contains 15 additional required provisions for FMPs, which are discussed below. Any FMP prepared by any Council, or by the Secretary, with respect to any fishery, must comply with these provisions.

(1) contain the conservation and management measures, applicable to foreign fishing and fishing by vessels of the United States, which are-- (A) necessary and appropriate for the conservation and management of the fishery to prevent overfishing and rebuild overfished stocks, and to protect, restore, and promote the long-term health and stability of the fishery; (B) described in this subsection or subsection (b), or both; and (C) consistent with the National Standards, the other provisions of this Act, regulations implementing recommendations by international organizations in which the United States participates (including but not limited to closed areas, quotas, and size limits), and any other applicable law

The proposed action is focused entirely on the administrative mechanisms by which federally-permitted commercial operators in the Mid-Atlantic and New England report fishing activity to NOAA Fisheries. For a description of the proposed measures and management alternatives intended to improve the management of the fisheries affected by this action, see section 5 of this document. For a discussion of consistency with the National Standards, see section 7.1.1. For a discussion of the consistency with other applicable laws, see sections 7.2-7.10. Previous Amendments to the relevant FMPs, available at <http://www.mafmc.org/fishery-management-plans>, and the current regulations (<http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=1e9802ffddb05d0243d9c657fade956c&rgn=div5&view=text&node=50:12.0.1.1.5&idno=50>) can be consulted for the relevant conservation and management measures.

(2) contain a description of the fishery, including, but not limited to, the number of vessels involved, the type and quantity of fishing gear used, the species of fish involved and their location, the cost likely to be incurred in management, actual and potential revenues from the fishery, any recreational interest in the fishery, and the nature and extent of foreign fishing and Indian treaty fishing rights, if any.

For a description of the vessels affected, see Section 4. The proposed action does not directly affect quantity of fishing gear used; therefore, a description of these aspects of the fishery is not applicable. Recreational interests, foreign fishing, and Indian treaty fishing rights are not affected by this action. Previous Amendments to the relevant FMPs, available at <http://www.mafmc.org/fishery-management-plans>, provide additional fishery descriptions.

(3) assess and specify the present and probable future condition of, and the maximum sustainable yield and optimum yield from, the fishery, and include a summary of the information utilized in making such specification.

The proposed action is limited to a modification of the existing mechanisms by which federally permitted commercial operators in the Mid-Atlantic and New England report their fishing activity. Maximum sustainable yield and optimum yield of any fishery for which these reporting requirements are addressed in this action are not affected by the proposed management measures, but have been addressed in previous Amendments (<http://www.mafmc.org/fishery-management-plans>).

(4) assess and specify--(A) the capacity and the extent to which fishing vessels of the United States, on an annual basis, will harvest the optimum yield specified under paragraph (3); (B) the portion of such optimum yield which, on an annual basis, will not be harvested by fishing vessels of the United States and can be made available for foreign fishing; and (C) the capacity and extent to which United States fish processors, on an annual basis, will process that portion of such optimum yield that will be harvested by fishing vessels of the United States.

The proposed action does not affect the capacity or extent to which fishing vessels of the U.S. would harvest the optimum yield of any fishery, the portion of such optimum yield which would not be harvested by U.S. fishing vessels and could be made available for foreign fishing, or the capacity and extent to which U.S. processors would process that portion of such optimum yield harvested by U.S. fishing vessels; therefore, a description of these aspects of the fisheries is not applicable to this action, but have been addressed in previous Amendments (<http://www.mafmc.org/fishery-management-plans>).

(5) specify the pertinent data which shall be submitted to the Secretary with respect to commercial, recreational, and charter fishing in the fishery, including, but not limited to, information regarding the type and quantity of fishing gear used, catch by species in numbers of fish or weight thereof, areas in which fishing was engaged in, time of fishing, number of hauls, and the estimated processing capacity of, and the actual processing capacity utilized by, United States fish processors.

For a discussion of the reporting requirements associated with this action, see the description of the proposed action in section 5.

(6) consider and provide for temporary adjustments, after consultation with the Coast Guard and persons utilizing the fishery, regarding access to the fishery for vessels otherwise prevented from harvesting because of weather or other ocean conditions affecting the safe conduct of the fishery; except that the adjustment shall not adversely affect conservation efforts in other fisheries or discriminate among participants in the affected fishery.

The proposed action does not affect the access of any fishing vessel to any fishery because of weather, ocean conditions, or any other potential concern; therefore, this element of the Magnuson-Stevens Act does not apply, but has been addressed in previous Amendments (<http://www.mafmc.org/fishery-management-plans>).

(7) describe and identify essential fish habitat for the fishery based on the guidelines established by the Secretary under section 305(b)(1)(A), minimize to the extent practicable adverse effects on such habitat caused by fishing, and identify other actions to encourage the conservation and enhancement of such habitat

EFH is described and identified for the affected fisheries in prior FMPs and amendments to those FMPs. The proposed action makes no changes to any EFH of any species. Section 6.2 describes the effects the proposed action, and the alternatives to the proposed action, is likely to have on the habitat, including EFH, of any fishery resources managed under a Mid-Atlantic or New England FMP. Due to the administrative nature of the measures in the proposed action, there would be no direct impacts on any habitat or EFH; therefore, an EFH consultation is not required.

(8) in the case of a fishery management plan that, after January 1, 1991, is submitted to the Secretary for review under section 304(a) (including any plan for which an amendment is submitted to the Secretary for such review) or is prepared by the Secretary, assess and specify the nature and extent of scientific data which is needed for effective implementation of the plan.

All the FMPs covered by this action identify landings information as key data needed for effective monitoring and implementation of said FMPs. The proposed action is intended to improve the quality, timeliness, and reliability of data collected from commercial operators. For a complete description of the need for these data, see sections xx.

(9) include a fishery impact statement for the plan or amendment (in the case of a plan or amendment thereto submitted to or prepared by the Secretary after October 1, 1990) which shall assess, specify, and describe the likely effects, if any, of the conservation and management measures on--(A) participants in the fisheries and fishing communities affected by the plan or amendment; and (B) participants in the fisheries conducted in adjacent areas under the authority of another Council, after consultation with such Council and representatives of those participants.

For a description of the participants in the fisheries affected by the proposed action, see sections xx.

(10) specify objective and measurable criteria for identifying when the fishery to which the plan applies is overfished (with an analysis of how the criteria were determined and the relationship of the criteria to the reproductive potential of stocks of fish in that fishery) and, in the case of a fishery which the Council or the Secretary has determined is approaching an overfished condition or is overfished, contain conservation and management measures to prevent overfishing or end overfishing and rebuild the fishery.

The proposed action makes no changes or has any effect on the approved overfishing definitions for any fishery managed under a Mid-Atlantic or New England FMP.

(11) establish a standardized reporting methodology to assess the amount and type of bycatch occurring in the fishery, and include conservation and management measures that, to the extent practicable and in the following priority--(A) minimize bycatch; and (B) minimize the mortality of bycatch which cannot be avoided.

This action deals only with the administrative mechanisms through which commercial operators report their fishing activity; therefore, this provision of the Magnuson-Stevens Act does not apply to this action.

(12) assess the type and amount of fish caught and released alive during recreational fishing under catch and release fishery management programs and the mortality of such fish, and include conservation and management measures that, to the extent practicable, minimize mortality and ensure the extended survival of such fish.

This action proposes no related measures.

(13) include a description of the commercial, recreational, and charter fishing sectors which participate in the fishery and, to the extent practicable, quantify trends in landings of the managed fishery resource by the commercial, recreational, and charter fishing sectors.

The only sector of the fisheries affected by this proposed action is the commercial sector. A description of those affected by this proposed action is provided in section 4. Additional details on the fishing sectors is available in previous Amendments (<http://www.mafmc.org/fishery-management-plans>).

(14) to the extent that rebuilding plans or other conservation and management measures which reduce the overall harvest in a fishery are necessary, allocate any harvest restrictions or recovery benefits fairly and equitably among the commercial, recreational, and charter fishing sectors in the fishery.

The proposed action includes no management measures that could reduce the overall harvest in a fishery. Therefore, the allocation of harvest restrictions or recovery benefits among the commercial, recreational, and charter fishing sectors, beyond any allocations of such already made in the FMPs, is not necessary.

(15) establish a mechanism for specifying annual catch limits in the plan (including a multiyear plan), implementing regulations, or annual specifications, at a level such that overfishing does not occur in the fishery, including measures to ensure accountability.

The proposed action includes no measures related to catch limits and only relates to the administrative mechanism through which commercial operators submit already required Vessel Trip reports.

7.2 National Environmental Policy Act

Due to the administrative nature of the regulations that would result from the proposed action, this action is categorically excluded from the requirement to prepare an environmental assessment, in accordance NOAA Administrative Order 216-6. The proposed action is a change to a regulation which does not result in a substantial change in any of the following: Fishing location, timing, effort, authorized gear types, access to fishery resources or harvest levels.

7.3 Initial Regulatory Flexibility Analysis and Regulatory Impact Review

TO BE COMPLETED AFTER PREFERRED ALTERNATIVE IS SELECTED

7.4 Executive Order (E.O.) 12866 (Regulatory Planning and Review)

TO BE COMPLETED

7.5 Executive Order (E.O.) 13132 (Federalism)

TO BE COMPLETED

7.6 Endangered Species Act

Section 7 of the ESA requires Federal agencies conducting, authorizing, or funding activities that affect threatened or endangered species to ensure that those effects do not jeopardize the continued existence of listed species. Based on the administrative nature of the action, the Council has concluded is that there would be no direct or indirect impacts on protected resources, including endangered or threatened species or critical habitats.

7.7 Marine Mammal Protection Act (MMPA)

Based on the administrative nature of the action, the Council has concluded that there would be no direct or indirect impacts on marine mammals, that the proposed action is consistent with the provisions of the MMPA, and that the proposed action would not alter existing measures to protect the species likely to inhabit the management units of the subject fisheries. None of the proposed specifications are expected to significantly alter fishing methods or activities or result in substantially increased effort that would impact species afforded protection under the Marine Mammal Protection Act of 1972 (MMPA).

7.8 Administrative Procedures Act (APA) and Paperwork Reduction Act (PRA)

TO BE COMPLETED

7.9 Coastal Zone Management Act

Section 307(c)(1) of the Federal Coastal Zone Management Act of 1972 requires that all Federal activities that directly affect the coastal zone be consistent with approved state coastal zone management programs to the maximum extent practicable. Pursuant to the Coastal Zone Management Act regulations at 15 CFR 930.35, a negative determination may be made if there are no coastal effects and the subject action: (1) Is identified by a state agency on its list, as described in ' 930.34(b), or through case-by-case monitoring of unlisted activities; or (2) which is the same as or is similar to activities for which consistency determinations have been prepared in the past; or (3) for which the Federal agency undertook a thorough consistency assessment and developed initial findings on the coastal effects of the activity. This action would have no effect on any coastal use or resources of any state.

7.10 Data Quality Act

Pursuant to NOAA guidelines implementing section 515 of Public Law 106-554 (the Data Quality Act), all information products released to the public must first undergo a Pre-Dissemination Review to ensure and maximize the quality, objectivity, utility, and integrity of the information (including statistical information) disseminated by or for Federal agencies. The following section addresses these requirements.

7.10.1 Utility

The information presented in this document should be helpful to the intended users (the affected public) by presenting a clear description of the purpose and need of the proposed action, the measures proposed, and the impacts of those measures. A discussion of the reasons for selecting the proposed action is included so that intended users may have a full understanding of the proposed action and its implications, as well as the Councils' rationale.

Until a proposed rule is prepared and published, this document is the principal means by which the information contained herein is available to the public. The information provided in this document is based on the most recent available information from the relevant data sources. The development of this document and the decisions made by the Councils to propose this action are the result of a multi-stage public process. Thus, the information pertaining to management measures contained in this document has been improved based on comments from the public, the fishing industry, members of the Council, and NMFS.

The Federal Register notice that announces the proposed rule and the final rule and implementing regulations will be made available in printed publication, on the website for the Greater Atlantic Regional Fisheries Office, and through the Regulations.gov website. The Federal Register documents will provide metric conversions for all measurements.

7.10.2 Integrity

Prior to dissemination, information associated with this action, independent of the specific intended distribution mechanism, is safeguarded from improper access, modification, or destruction, to a degree commensurate with the risk and magnitude of harm that could result from the loss, misuse, or unauthorized access to or modification of such information. All electronic information disseminated by NOAA Fisheries adheres to the standards set out in Appendix III, Security of Automated Information Resources, of OMB Circular A-130; the Computer Security Act; and the Government Information Security Act. All confidential information (e.g. Vessel Trip Reports) is safeguarded pursuant to the Privacy Act; Titles 13, 15, and 22 of the U.S. Code (confidentiality of census, business, and financial information); the Confidentiality of Statistics provisions of the Magnuson-Stevens Act; and NOAA Administrative Order 216-100, Protection of Confidential Fisheries Statistics.

7.10.3 Objectivity

For purposes of the Pre-Dissemination Review, this document is considered to be a Natural Resource Plan. Accordingly, the document adheres to the published standards of the Magnuson-Stevens Act; the Operational Guidelines, FMP Process; the EFH Guidelines; the National Standard Guidelines; and NOAA Administrative Order 216-6, Environmental Review Procedures for Implementing the National Environmental Policy Act.

This information product uses information of known quality from sources acceptable to the relevant scientific and technical communities. The policy choices are clearly articulated in the management alternatives considered in this action. The supporting data upon which the policy choices are based, are described in Section 4 of this document. All supporting materials, information, data, and analyses within this document have been, to the maximum extent practicable, properly referenced according to commonly accepted standards for scientific literature to ensure transparency.

The review process used in preparation of this document involves the responsible Councils and the Greater Atlantic Regional Fisheries Office. Review by staff at the Regional Office is conducted by those with expertise in fisheries management and policy, fisheries data collection (and electronic data collection), and compliance with the applicable law. Final approval of the action proposed in this document and clearance of any rules prepared to implement resulting regulations is conducted by staff at NOAA Fisheries Headquarters, the Department of Commerce, and the U.S. Office of Management and Budget.

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Commercial eVTR Framework Joint Action

FMAT Webinar Meeting Summary

October 25, 2019

FMAT Members Present: Sam Asci (NEFMC), Josh Moser (NEFSC), Jay Hermsen (GARFO), Moira Kelly (GARFO), Karson Coutre (Council Staff)

Others Present: Barry Clifford (GARFO), Andy Loftus (eVTR Outreach Contractor)

The FMAT met via webinar to discuss and provide feedback on analyses to inform the Councils' final action decisions and to be included in the framework document. The FMAT also discussed the considerations of the different alternatives and which were preferred. Lastly, the FMAT received an update on the next steps before final action.

The following comments and recommendations were made by the eVTR FMAT

Analyses

NEFMC staff provided feedback from presenting an eVTR action update to the NEFMC Advisory Panels and Committees ahead of their September council meeting. One AP member was interested in seeing a table documenting which eVTR applications are currently being used by gear type within the commercial sector. This led to discussion of how breaking down eVTR application use by gear type can be useful but can also be misleading if used to inform which applications would be used in the future. For example, some of the first eVTR adopters in the commercial fleet were participants in study fleet through the NEFSC and those participants were using the program FLDRS to report finer scale scientific information as well as fulfill their VTR requirements. The NEFSC cooperative research branch has indicated that FLDRS will remain a tool for participants in cooperative research through study fleet but will not be expanded for large scale use as stand-alone eVTR application. Another consideration when presenting application use by sector is that NOAA's Fish Online mobile application was developed the most recently, while eTrips mobile has been around for several years, so there will be different app use patterns that require context. Historical numbers may not be a helpful guide to dictate what operators use moving forward.

The FMAT also discussed the best way to describe the different commercial permit holders throughout the region in the 'affected users' section of the framework document. The description of overlap between the NEFMC and MAFMC permit holders can be briefly discussed however FMAT members felt that because it is a joint action document, the numbers can be discussed as a regional summary.

The FMAT discussed the economic section of the document and a request from an advisor for a more robust description of the economic benefits to GARFO. The FMAT discussed that the potential benefits of moving to eVTR are about data quality, efficiency, and a key step towards future modernization rather than cost savings. Some of the cost savings to GARFO would be in contract staff time, data entry, postage, printing and FTE time. However, there are costs up front during application development and other IT resources. It was also noted that economic reasons can't be the only reason to take management action according to National Standard 5. Multiple members of the FMAT felt the benefits and costs to the agency could be described qualitatively in the document and one member did not want to include numbers that may not be accurate depending on the temporal scale pre and post-implementation. In the for-hire eVTR action document, the focus was more on the economic benefit/cost to the user.

Alternatives

The FMAT discussed the 5 sub-alternatives under the eVTR alternative that propose different reporting deadlines. The FMAT members generally felt that it makes sense to change the reporting deadlines in order to unify them across commercial permits in the region. Currently, some permits require monthly and some require weekly VTR submission, however permit-holders are held to their strictest reporting requirement.

One FMAT member suggested that weekly reporting was the most justifiable deadline because it aligns with dealer reporting and is the current deadline for many permit holders. This alternative has the benefit of aligning reporting across commercial permit holders while still being the closest to status quo. They also felt it was important to think about accessibility to the internet and noted that there are ports where there is no internet and no cell service. Another FMAT member added that in terms of quota monitoring, weekly reporting has been successful. The reasoning to select a shorter reporting deadline would be reducing recall bias or reducing error.

The FMAT discussed the definition of weekly reporting. Weekly reporting for dealers is Sunday through Saturday and they must report within 3 days of the end of the reporting week. Weekly reporting for commercial VTRs also has a reporting week from Sunday through Saturday. If a trip starts in one week and offloads in the next, then that trip must be reported during the week that the catch was offloaded. Paper vessel trip reports must be postmarked or received by the Tuesday following the reporting week. Alternatively, operators may instead submit vessel trip reports electronically using approved electronic vessel trip report software.

One FMAT member pointed out that having the same deadline for those that participate in both the commercial and for hire sector allows for simplicity in reporting, compliance, and enforcement. Another member noted that having equity in the reporting deadline for both sectors should also be considered, and the for-hire sector deadline is 48 hours. They also wondered whether it was worth considering what deadline might be needed to have in place to coincide with future reporting improvements. One member added that there is a future where more frequent reporting could eliminate the need for other requirements (consolidating reporting) but that is theoretical at this point. Another FMAT member felt that if there was need for more frequent reporting under one commercial permit, it should not necessarily dictate the deadline requirement throughout the region.

While discussing reporting deadlines, the FMAT looked at frequency distributions for submission time in 2018 for vessels submitting electronically in both the for-hire sector and commercial sector. The FMAT discussed that for both sectors the majority of the eVTR submissions occurred the same day that the trip ended. In 2018 (April-December), 82% of the eVTRs from the for-hire sector were submitted within the 48-hour deadline after the trip ended, showing high compliance. The FMAT felt that these distributions could help inform alternative selection and should be included in the information distributed and presented to the Councils.

One FMAT member asked whether changing the MAFMC for-hire eVTR deadline in this action/document was a possibility if the Councils were to choose a reporting deadline other than 48 hours. Other FMAT members responded that it would have to be added to the action by the Councils and there has been desire from leadership to keep this action specific to the MAFMC and NEFMC commercial sector.

The FMAT discussed the different considerations between reporting in the commercial and for hire sectors. There is no dealer reporting to validate or serve as an additional data stream in the for-hire sector so reducing recall bias may be more of a concern. One additional step for a commercial trip compared with a for-hire trip is filling out the dealer name and number before submission. An FMAT member noted that the vast majority of the time the boat already knows which dealer they will be going to, so this information is not a large concern when considering submission deadlines. They also clarified that if a vessel is selling to a trucking company that is going to sell to multiple dealers, it is that trucking company's responsibility to submit who they sell to, while the vessel would list that trucking company as the dealer.



Commercial eVTR Framework

FMAT Webinar Meeting Summary

May 10, 2019

FMAT Members Present: Sam Asci (NEFMC), Josh Moser (NEFSC), Jay Hermsen (GARFO), Moira Kelly (GARFO), Karson Coutre (Council Staff)

Others Present: Special Agent Todd Smith (OLE), Andy Loftus (eVTR Outreach Contractor)

The FMAT met via webinar and received an update on the discussion during the MAFMC and NEFMC April Council Meetings and subsequent framework development. Law enforcement was invited to participate in discussion of the enforcement considerations of potential regulatory changes. The FMAT provided feedback on the presented information and discussed framework development.

The following comments and recommendations were made by the eVTR FMAT

Enforcement Considerations

In day to day dockside patrol, enforcement doesn't often use the 1-year and 3-year record keeping regulations, however it is useful to see VTRs from the last few trips. There is a lot of value in the requirement that fishermen maintain records for some period of time, but we need to better understand what that looks like in an electronic age. Ultimately, enforcement would like to be cooperative with changing technology but would rather see nothing changed with the record keeping requirements. Enforcement cares more about making sure vessel operators can bring up their VTR information when asked.

The FMAT agreed that it makes sense to have a standardized form to present to enforcement so that individual officers don't have to understand each application interface. Currently, the NMFS Northeast Region eVTR technical requirements¹ for software to be approved addresses this with the following language: "When requested by authorized personnel, a vessel must present for inspection vessel trip reports from the previous twelve months. Thus, the product must have the capability to display a facsimile of the paper VTR form with a separate 'page' for each sub-trip." However, the way users download their own information and how it is stored varies by application.

¹National Marine Fisheries Service Northeast Region Electronic Vessel Trip Reporting (eVTR) Technical Requirements [chrome-extension://oemmndcbldboiebfnladdacbfdmadadm/https://www.greateratlantic.fisheries.noaa.gov/aps/evtr/doc/evtr_tech_requirements.pdf](https://www.greateratlantic.fisheries.noaa.gov/aps/evtr/doc/evtr_tech_requirements.pdf)

Enforcement is also concerned that in some instances there are discrepancies between the VTR and dealer reports, as well as other cases of potential misreporting. To remedy this, all versions of a submitted VTR should be tracked by managers. This may already be done but that will need to be investigated. One FMAT member said that tracking all submitted versions of an eVTR should be written into the framework document.

The FMAT also discussed the issue that attempts to submit an eVTR aren't documented, and an eVTR is only timestamped when a record is successfully submitted and accepted. Users in the for-hire sector have brought this up and have asked that their attempts to submit be timestamped in order to prove they tried to be compliant. Based on discussions during the for-hire action, eVTR records are retained on the device, so users wanting to login to a different device with their eVTR app would not have their past VTR records available. However, if a device goes overboard, app providers can restore their past VTRs onto a new device.

One FMAT member recommended consulting NOAA's general counsel (GC) on how GARFO is going to handle documentation and record retention in the electronic age. Their guidance would be helpful especially if electronic record keeping has already been taken up by GC in different regions or contexts.

Framework Alternatives

The FMAT discussed the difference between an alternative that has a 7-day reporting deadline versus a weekly deadline and felt this was worth clarifying. Weekly reporting can be anywhere from 3-9 days and is the current requirement for many of the Mid-Atlantic FMPs, so a weekly alternative would mean *status quo* reporting deadlines for many permit holders. This may have been the intent behind the motion that added alternatives during the MAFMC meeting in April although the wording was "7 days". Weekly electronic reporting is also the current requirement for dealers. One FMAT member noted that monthly reporting is antiquated and creates quite a data lag.

The FMAT also felt it was worth considering that the for-hire fleet wants to move to a 72-hour deadline from 48 hours because in practice, there were times that they failed to comply. One FMAT member said that 72 hours was appealing on the commercial side and that it felt attainable. In their experience, successful electronic reporting works best when an operator incorporates their reporting into an established routine.

One FMAT member wondered if we should use this action to align the for-hire reporting deadline. Another member thought that we should not muddy the waters by adding the for-hire sector to this action due to the number of affected commercial users and the potential for joint action with the New England Council. However, it makes sense to consider a reporting deadline right now that can work towards future alignment of all sectors if possible.

One FMAT member preferred weekly across dealers and commercial vessels and would argue for as much consistency as possible. Another FMAT member commented that a weekly reporting requirement is closer to the idea of switching from paper to electronic with everything else *status quo*, while still achieving some alignment in reporting.

Analyses

It would be helpful to know how many permit holders currently only have permits that require monthly reporting and the FMAT thought that this is likely a small number. This would help show the impacts of different reporting deadline changes.

For the upcoming June NEFMC Council meeting some FMAT members felt it would be worthwhile to have a breakdown of the different scenarios (joint action, no joint action, action only on dogfish plan, etc) and the number of users affected under each scenario.

Applications/Outreach

Due to public comments received at both April Council meetings, the FMAT discussed the importance of communicating that FLDRS is not available for full scale eVTR deployment during this action. Staff in charge of FLDRS have been actively referring vessels interested in eVTR to eTrips Mobile or Fish Online, as they are more user friendly. One exception to this is the Surfclam and Ocean Quahog fleet because eClams/FLDRS is the only eVTR app that accommodates their reporting requirements. During outreach it will also be important to be clear that people currently using FLDRS to submit eVTRs that are already compliant.



Combined Advisory Panel Meeting Summary

Commercial Electronic Vessel Trip Report (eVTR) Omnibus Framework

July 23, 2019

The Mid-Atlantic Fishery Management Council's (Council) Advisory Panels (AP) for species requiring commercial permits met via webinar July 23, 2019 to review and comment on the upcoming Commercial eVTR Omnibus Framework. These APs include Spiny Dogfish, Tilefish, Mackerel, Squid, Butterfish, Summer Flounder, Scup, Black Sea Bass, Bluefish, and Surfclam and Ocean Quahog. The Council will consider feedback provided by the APs at its December 2019 meeting.

Attendees: Alan Bianchi (NC DMF), Barry Clifford (GARFO), Bill Duffy (GARFO), Bob Gatewood, Bonnie Brady (LIFA), Caitlin Starks (ASMFC), Carrie Kennedy (MDNR), Chris Batsavage (MAFMC), Claire Fitz-Gerald (GARFO), Dom St. Amand (NEFSC), Eric Reid (NEFMC, MAFMC), Ed Martino (ACCSP), Emerson Hasbrouck (Cornell), Geoff White (ACCSP), Hank Soule (Saving Seafood), Heidi Henninger (AOLA), Jay Hermsen (GARFO), Jeff Kaelin (Lund's Fisheries), Jennifer Couture (NEFMC), Joanne Pellegrino (GARFO), John Hoey (NEFSC), John Maniscalco (NY DEC), Josh O'Connor (GARFO), Julie Defilippi Simpson (ACCSP), June Lewis (AP member), Karen Holmes (ACCSP), Katherine Wilson (NMFS), Katie Almeida (Towne Dock), Kevin Staples (CSSF), Kiley Dancy (MAFMC Staff), Libby Etrie (NEFMC), Maggie Raymond, Matthew Heyl (NJ DFW), Meghan Lapp (Seafreeze Ltd.), Melanie Griffin (MA DMF), Michael Luisi (MAFMC), Michelle Duval, Mike Carroll, Mike Plaia, Mimi Spain (Harbor Light Software), Moira Kelly (GARFO), Anna Mercer (NEFSC), Nichola Meserve (MA DMF), Peter Hughes (MAFMC), Rich Malinowski (SERO), Robert Cericola, Scott Curatolo-Wagemann (Cornell), Sam Ascii (NEFMC), Simon Dick, Steve Lockhart (NEFSC), Wes Townsend (MAFMC), "Alexa K"

Presenters: Andrew Loftus (MAFMC Outreach Contractor), Karson Coutre (MAFMC Staff)

General eVTR questions and comments

A Council member and an advisor both stated that any approved application should accommodate different state reporting to reduce redundancies. Greater Atlantic Regional Fisheries Office (GARFO) staff noted that while it is not a requirement, many states defer to the federal VTR. Additionally, GARFO is working with ACCSP to accommodate fulfilling both requirements.

One participant also asked about fees associated with the different eVTR applications. Staff referenced that eTrips mobile, Fish Online, and FLDRS are all free, while other systems have associated fees. An AP member asked whether the different applications would be able to integrate with the GARFO database. Staff and GARFO responded that all applications are required to meet

technical standards that include sending the data in a compatible format, so on the front end they use different operating systems, but on the back end they are standardized.

One participant questioned how data handling has gone since the implementation of eVTR for the MAFMC for-hire sector in March 2018. GARFO stated data handling has gone well with no noticeable drop in compliance and that the VTR data has been available in real time through the database. Additionally, the necessary tools are in place so industry can verify receipt of a submitted VTR.

One advisor asked what types of vessels are already doing eVTRs and which applications are preferred. Staff provided a summary table of eVTR use by application and by sector. Top eVTR apps are FLDRS, eTrips mobile, and Fish Online. Multiple advisors felt that more fine scale, tow-by-tow information should be collected, and this action is an opportunity to do that. They also questioned why FLDRS was not being expanded and felt it should be given more resources. The Chief of the Northeast Fishery Science Center (NEFSC) Cooperative Research Branch clarified that they will support all current FLDRS users and expand to fleets that are interested in using FLDRS as a data collection tool. She added that eVTR using FLDRS is a side benefit to those participating in cooperative research. Staff noted that this would be clarified in outreach documents moving forward.

One AP member asked if the GARFO licensed operator or the permit holder is responsible for VTR submission. GARFO clarified that the regulations state either the owners or operators can submit VTRs but ultimately the permit holder is responsible.

A Council Member noted that under eVTR, there still must be a transfer of the VTR number from the vessel to the dealer. GARFO staff added that a primary objective of the Fishery Dependent Data Initiative (FDDI) is to have these numbers more integrated in the future so that information will be transferred systematically, and the operator will no longer have to do it.

An advisor asked what the timeline is for FDDI and questioned if that is relevant to the timing of this action. GARFO staff noted that there are multiple steps to FDDI and the FDDI partners are working on a roadmap with timelines to be sent out in the next few months.

Multiple participants felt that the eVTR editing process needs to be streamlined and made more user friendly.

One advisor wanted a better understanding of what the eVTR benefits are for the government.

One advisor said that GARFO needs to do their due diligence with training because this is a big undertaking. Another added that all the major ports need to be covered for workshops.

One participant noted that their company was developing software to combine a hail out system that is already developed with an eVTR component in the same program and hope to have it completed in 2020.

Alternatives Discussion

Advisors discussed the current reporting deadlines for quota managed species and sector reporting. They then questioned what an effective eVTR reporting timeline looks like for managers. Another

advisor questioned whether a specific submission deadline may be too frequent for GARFO to handle. GARFO clarified that eVTRs are available in a matter of minutes after submission and are not limited by volume, so the Council does not need to consider this when choosing a reporting deadline. One Council Member asked which report (dealer or VTR) drives the quota monitoring reports. GARFO clarified that dealer data is used for the landings in pounds while VTR data is used for area and effort information.

One advisor and one person experienced with vessels participating in cooperative research felt that the deadline for submission could be 48 hours, and one person added that this would create consistency with the for-hire sector's eVTR deadline.

One participant noted that his vessels are paid after they turn in a VTR, so the office will need some way of verifying they have been submitted electronically. Thus, the operators will likely submit within 24 hours of ending a trip.

One New England Fishery Management Council member noted that in the groundfish fishery, sectors may need a reporting deadline of 24 hours for quota monitoring.

One advisor felt that a reporting deadline of 72 hours after a trip is complete is plenty of time.



Public Meeting Summary

Commercial eVTR Omnibus Framework Action: Review of Common Reporting Applications for Electronic Vessel Trip Reports and How to Get Started

November 20, 2019

5:30 pm -7:30 pm

Webinar Participants

Presenters: Karson Coutre (MAFMC Staff), Andy Loftus (MAFMC Outreach Contractor), Fran Karp (Harbor Light Software), Jay Hermsen (GARFO)

Attendees: Barry Clifford (GARFO), Bonnie Brady (LIFA), Christopher McGuire, CJ Schlick, David Leveille, Doug Potts, Gerry O'Neill, Greg DiDomenico (GSSA), Greg Power (GARFO), Gretchen Hanshew (NMFS), Hank Soule, Joanne Pellegrino (GARFO), Julie Simpson (ACCSP), K. Gross, Karen Holmes (ACCSP), Kaycee Coleman (US FWS), Lange Solberg, Laura Versaggi (ACCSP), Laurie Nolan (MAFMC), Matt Heyl (NJ DFW), O'Connor, Pam Thames (GARFO), Sonny Gwin (MAFMC), Stephanie Iverson (VMRC), Walter Anoushian (GARFO), James Fletcher (AP Member), Sam Asci (NEFMC Staff), "Peter", "Bryan", "Mary", "PT", "J"

Summary

The purpose of this webinar was to summarize the proposed action, provide information on how commercial fishing operators can get started using eVTRs, and provide demonstrations for two commonly used eVTR applications. MAFMC staff provided a brief overview of the proposed action and the MAFMC eVTR outreach coordinator provided information on frequently asked questions and how to get started with eVTR. Harbor Light Software staff demonstrated ACCSP's eTrips mobile, and GARFO staff demonstrated NOAA's Fish Online. All presenters and demonstrators answered questions regarding the software and the eVTR action in general.

Questions from the Public and Corresponding Answers

1. Will people be allowed to complete a paper form at sea and fill out the electronic form to submit on their computer at home?
No. A VTR number is needed to provide to a dealer when you sell your catch and this number is generated when the permit holder begins an eVTR trip. Therefore, an electronic device is necessary to begin the trip and have the VTR number when they return to port to sell their catch. Over time, the paper forms will be completely phased out.

2. What if a captain changes the dealer who they were originally intending to sell their catch to after they return to port? How do you change that in the system?

Federal regulations require that only the parts of the VTR that can be completed before returning to port be filled out and completed at the time that the vessel enters port. The dealer information is not available until a sale is made and therefore is not required to be filled out until that sale happens. Since eVTRs will not be required to be *submitted* until sometime after entering port (deadline to be determined during final action) this should provide captains time to enter the correct dealer information before submitting their report. Should changes or corrections need to be made to an already submitted, eVTR, the user may simply retrieve the eVTR on their mobile device, make the necessary changes, and resubmit. Alternatively, any previously submitted eVTR, regardless of the software or application used to originally submit, can be retrieved, amended, and resubmitted using GARFO's Fish Online web portal.

3. If people don't have a device already, does this mean that they will need to buy a smartphone or tablet?

Yes. An economic analysis of cost will be included in the final action. At the low-cost end, wi-fi capable tablets can be purchased for \$150 or less and can connect to any public or private wi-fi system to submit the reports within the reporting timeframe that is chosen and there would be no recurring monthly cost. On the high end, captains who choose to purchase a new smartphone and a monthly cellular data plan would incur higher costs for this option.

4. Will NOAA be providing vouchers or compensation to captains to purchase equipment? At present, there are no plans for any compensation or a cost reimbursement plan.

5. What about captains who can't read or write? How do they learn the system?

Captains who cannot read or write will likely need similar assistance to what they are currently obtaining to fill out paper VTR reports. The Council and NOAA will be hosting a series of workshops to provide hands-on training, and each of the software vendors has videos and documents to teach captains how to use their specific system. Additionally, GARFO's regionally based Port Agents are available to offer support.

6. Can you change an eVTR after it has been submitted?

Yes. Each system provides a means to edit an electronic VTR after it has been submitted and to submit/certify a new version.

7. Can owners manage eVTR reports for multiple captains in their fleet?

Yes, there is an option when using GARFO Fish Online web portal for an owner/permit holder to manage the all the submitted VTRs/eVTRs through a web-based portal.

Enhancements to the Fish Online web portal are planned in order to streamline the functionality and convenience of the web portal for fleet owners and sector managers.

8. Will participants in FLDRS need to change to a new system?

No. FLDRS is, first and foremost, a system for participating captains to contribute detailed scientific data for fisheries management and research purposes. Secondly, it provides the capability to submit VTRs electronically directly to GARFO. So, participants in the Northeast Study Fleet who are already using FLDRS to submit their VTRs will continue to do so. FLDRS will not be offered to new users who are not participating in Study Fleet or research programs.

9. Why don't recreational anglers need to report electronically?
Since March of 2018, for-hire operators holding federal permits to fish for species managed by the Mid-Atlantic Council have been required to use these same electronic systems to submit their VTRs. Additionally, there is a small-scale effort to collect data electronically from some recreational anglers using these systems beginning in mid-2020.
10. What are the protocols for systems to get recertified? (note: this question only pertains to software developers, not captains)
Technical requirements can be found at <https://www.fisheries.noaa.gov/webdam/download/99074552>
11. Can eVTRs be printed or emailed?
If a user logs in to Fish Online or eTrips on the web, the eVTR can be printed. The eVTR can be also saved as a pdf (portable document format) and emailed.
12. Does this action apply to Highly Migratory Species (HMS) permits?
This eVTR action only applies to commercial permits for NEFMC and MAFMC managed species. If someone who has an HMS permit also holds a MAFMC or NEFMC managed species permit, this action applies to them and are therefore required to submit an eVTR for all trips regardless of waters fished or targeted species. If they only have an HMS permit, this action does not apply to them.
13. How will this action translate into more fish?
This action is focused on changing from paper to electronic reporting with the goal of improving data quality, reducing errors, and increasing efficiency for fishermen and managers. More accurate data allows for better science and management, however it may not translate directly to more fish. Transitioning to eVTR is essential in working towards the longer-term goal of one-stop shop reporting and data modernization.
14. In both eTrips/Mobile2 and FishOnline, there is a reference to 'effort'. What is meant by 'effort' in the reporting applications?
Effort in the eVTR reporting applications refers the section of a report that describes what, where, how much, and for how long fishing activity took place. On the paper form, these are questions 7 through 16, which include fishing gear, mesh/ring size, gear quantity, gear size, fishing depth (fathoms), number of hauls, chart area, latitude, longitude, and tow/soak time. If the vessel changes gear, mesh or ring size, and/or chart area during a trip, a new 'effort' must be recorded in the app, similar to the way a vessel operator would need to complete an additional VTR page when submitting a VTR on paper.

Other Comments

One participant commented that people will not have time to attend workshops and this is asking too much for those still using flip phones. Two participants commented that the Council or NMFS should pay for the electronic devices or there should be a voucher system for those who cannot afford an electronic device. One participant added that the recreational sector should be required to fill out VTRs and that is where better data is needed.

From: Mark Phillips <mark.st.phillips@gmail.com>

Sent: Saturday, November 9, 2019 10:38 AM

To: Moore, Christopher <cmoore@mafmc.org>

Subject:

I have some questions and thoughts on EVTRs. First I am not anti Evtrs but I am not sure they are for everybody, I am in studyfleet and I take it to heart I try to do the best job I can, I hated the paper VTRs because I had to find a post office wherever I was that's the good point.

I do tow by tow and it is a lot of work and when things are going wrong on the boat it can be a nightmare, I have learned how to rebuild the data when the computer crashes or power failure on the boat remember we go 24 hours a day and don't have access to an IT guy.

When VTRs were pushed we were told they would never be used for enforcement that lasted about 2 years then people were getting threatened or penalized for falsifying information some justified most not justified.

With EVTRs I make mistakes all the time because some of the stuff is automated most times not a big deal but other times it takes multiple phone calls and months to correct. All of these innocent mistakes are falsifying information if OLE wants you.

One big problem I see is having multiple formats and multiple companies, too complicated for captains that move around a lot. too many outside people having access to fisherman's information. I remember an incident I had with someone in the Coast Guard that was showing my boatracs information around to people and offered to let me know where other boats were fishing if I wanted. I fear if an environmental group gets this information they will use it to push more regulations.

I fear that when I carry an observer and my data doesn't match his I will get a NOVA, don't laugh because it has happened. I had an observer that falsified data on a trip of mine he got a reprimand of sorry you got caught don't get caught next time. I got a year of hell trying to get my discards back that I didn't catch.

I am not a fan of big government but I don't think EVTRs should be outsourced. I think the observer program has gotten much worse since it was outsourced and wish it would go back to NMFS running it. I know you are not talking about tow by tow now but it keeps popping up, so it will be. Enforcement was talked about with Illex tow by tow EVTRs so my fears of enforcement are justified.

Thanks Mark S Phillips F/V Illusion

From: James Fletcher <unfa34@gmail.com>

Sent: Thursday, November 21, 2019 11:51 AM

To: Moore, Christopher <cmoore@mafmc.org>; Didden, Jason <jdidden@mafmc.org>

Subject: ELECTRONIC VTR

CAN COUNCIL MANDATE ELECTRONIC VTR REPORTING BY ALL RECREATIONAL VESSELS FISHING IN THE EEZ? I SPOKE WITH Carson ASK THE NOAA ATTORNEY IF IN PROTEST THE COMMERCIAL INDUSTRY HOLDS THE PAPER VTR'S UNTIL COUNCIL & NMFS IMPLEMENTS ELECTRONIC VTR'S ON RECREATIONAL VESSELS IN EEZ. MAGNUSON 101-627 (8)

Council should be given 101-627, 104-297 **CAN COUNCIL MANDATE ELECTRONIC VTR REPORTING BY RECREATIONAL VESSELS IN EEZ? LOG IN PRIOR TO ENTERING EEZ & LOG OUT UPON RETURNING TO STATE WATERS?**

I AM UPSET!

--

James Fletcher
United National Fisherman's Association
123 Apple Rd.
Manns Harbor, NC 27953
252-473-3287

From: [Moore, Christopher](#)
To: [Coutre, Karson](#)
Subject: FW: public comment EVTR
Date: Tuesday, July 23, 2019 10:27:29 AM

From: Beverly Lynch <braelynych@gmail.com>
Sent: Tuesday, July 23, 2019 10:16 AM
To: Moore, Christopher <cmoore@mafmc.org>
Subject: public comment EVTR

Regarding electronic vessel trip reporting

My husband fishes and I do most of the paperwork, including our complicated income taxes, which I do on paper. I do them on paper because I read and comprehend paper better a screen. Maybe this is because I'm 68 and we didn't have computers when I was in school.

My husband is 62 and has never used a computer. He manages to fill the NE and SE paper trip reports, after I showed him how. He did not finish highschool and definately has ADHD. Commercial fishing suited him because there WAS no paper work. If you think workshops can teach someone like him how to fill electronic reports, think again.

When he sold lobsters at the dock, I filed the electronic dealer reports. Our dealer recommended a program that was easier than the SAFIS program he and his wife used. She was educated in and experienced with tech stuff and hated this system. I don't know if they ever got the kinks out of it. I see SAFIS is one of the programs you want to use for trip reports.

Anyhow, I used this "easy" dealer reporting program. I found it confusing, but by the end of the season, I could remember what to do. Each season, I had to learn all over again. My mind couldn't retain the complex steps and pages to follow. I never figured out how to fix mistakes and there were always unfinished reports due to that. The program would tell me when I'd missed something or filled something wrong, but often I sat there trying to figure out how to do it right or find the missing info. Meanwhile, feeling this was a waste of life, for time is life, isn't it? And what possible difference does it make what kind of lobsters and how many were sold at what price in Wachepreague, VA, that day? Does the government have to know that when it doesn't have to know how many non-citizens are in the country?

My husband goes out in rough weather that isn't good for expensive electronics. You say he could file these reports on a smart phone. His thick fingers wouldn't be able to pick out the keys on such a device on a good day let alone a bad one. Maybe he could find a way to secure a laptop. But will he be able to fill in the report when he can barely stand up?

I just received back some SE reports I had filled out for him. I studied them for half an hour trying to figure out what they meant about duplicate reports or start date being wrong, etc. I didn't see anything wrong. Then I realized I'd filled out the trip for the last day first. The trip report numbers weren't in the correct order! What difference does that make? I wonder what would have happened if they had been electronic. Alarms would have gone off, I suppose, and I still wouldn't know what I'd done wrong.

Please give us a choice of paper or electronic. Maybe young fishermen, if there are any, would prefer electronic and old ones paper. When the old ones retire, you'd have all young ones using their electronic devices. In fact most of them will be better at using their electronic devices than catching fish.