Common Questions: Trawl Electronic Monitoring (EM) Category

(Updated November 2025)

General Overview

How do I learn more about the EM Program? More information about the trawl EM category can be found in the Final Rule to Expand Electronic Monitoring to the Pollock Fisheries (89 FR 60796) and the Electronic Monitoring website. Information about the current purpose, data collection objectives, and annual selection rates can be found in the Annual Deployment Plans (ADP).

Who should I contact to learn more about the trawl EM category?

Trawl EM Category and Regulatory Questions

- Joel Kraski
    - Email: joel.kraski@noaa.gov
    - Phone: 907-531-6646

Observer Declare and Deploy System (ODDS) **Non-Account** Questions

- Mike Vechter
    - Email: mike.vechter@noaa.gov
    - Phone: 907-271-1696

ODDS Account Information

- ODDS Help Email
    - Email: odds.help@noaa.gov

Catch Monitoring and Control Plan (CMCP) Questions

- Melanie Rickett
    - Email: melanie.rickett@noaa.gov
    - Phone: 206-526-4070

Table of Contents

Trawl EM Category Eligibility 3

EM System Installation 6

Vessel Monitoring Plans 7

EM Coverage Requirements 9

End-of-Trip Requirements for Trawl EM Fishing Trips 11

Trawl EM Incentive Plan Agreements (TEM IPA) 11

Shoreside and Stationary Floating Processors 12

Disclaimer 13

Trawl EM Category Eligibility

What vessels are eligible to join the trawl EM category?
Owners or operators of a catcher vessel with a pollock trawl endorsement (PTW) on their Federal Fisheries Permit (FFP) and tender vessels receiving deliveries from these catcher vessels may request to be placed in the trawl EM category.

How does a catcher vessel join the trawl EM category?
Each year, catcher vessel owners or operators may request to join the trawl EM category using an application available through ODDS. ODDS will be available to opt into the trawl EM category for the upcoming fishing year beginning in early September. Catcher vessel owners or operators must request to join the trawl EM category for the upcoming fishing year by **November 1** of the current fishing year. This is an annual process that requires operators to opt in for **each year** they wish to be placed in the trawl EM category.

Do tender vessels have to request to join the trawl EM category by November 1 each year?
No. The November 1 deadline applicable to catcher vessels does not extend to tender vessels. NMFS will specify the anticipated number of tender vessels each year in the ADP based on available funds in the partial coverage category. While the November 1 deadline does not apply, tender vessels must have a NMFS-signed Vessel Monitoring Plan (VMP) in place prior to receiving catch from trawl EM category catcher vessels. Shoreside processor or fleet managers must contact NMFS to submit a request to join the trawl EM category on behalf of the tender vessel.

How will a vessel owner or operator be notified that the vessel has been approved or denied for the trawl EM category?
NOAA Fisheries will notify the vessel owner via ODDS whether that vessel has been approved or denied for the trawl EM category. Vessel owners or operators will be able to review their approval status by logging into ODDS after **November 15** each year. NOAA Fisheries will deny approval to vessels that did not meet the trawl EM category criteria.

Where can the current approval criteria for admission to the trawl EM category be found?
The trawl EM category approval criteria for admission to the trawl EM category are specified at § 679.51(g) and described in the ADP.

How long is a vessel in the trawl EM category for?
Vessels are placed in the trawl EM category for the duration of the fishing year for which they requested placement, if accepted by NMFS. Catcher vessel owners or operators must request placement into, and be approved by NMFS for, the trawl EM category by **November 1** on an annual basis.

Does approval for the trawl EM category automatically renew each year?
No. Vessels must opt into the trawl EM category on an annual basis.

Could a catcher vessel be in both the trawl EM category and an observer selection pool during a fishing year?
Yes. Approved trawl EM category catcher vessels directed fishing for pollock with pelagic trawl gear must comply with all regulations of the trawl EM category. If a vessel indicates through ODDS that they intend to deploy nonpelagic trawl gear during a trip, they will be placed into the observer selection pool for that trip.

How does a vessel leave the trawl EM category?
If a vessel owner or operator wishes to leave the trawl EM category for an upcoming fishing year, **no action is required**. By not submitting a request to join the trawl EM category, a vessel will automatically be placed into either full or partial observer coverage.

Can a vessel leave the trawl EM category during a calendar year?
No. Vessels may not leave the trawl EM category during a calendar year. NOAA Fisheries needs to maintain the sampling design for a given fishing year.

Is there a selection rate for the trawl EM category?
No. Every trip where a catcher vessel is directed fishing for pollock with pelagic trawl gear is subject to the rules and regulations of the trawl EM category.

Am I in the full coverage or partial coverage trawl EM category?

- Partial Coverage - Catcher vessels directed fishing for pollock with pelagic trawl gear in the Gulf of Alaska or Aleutian Islands pollock fisheries.
- Full Coverage - Catcher vessels directed fishing for pollock with pelagic trawl gear in the Bering Sea or Community Development Quota pollock fisheries.

Do I have to log trips in ODDS?

- Partial Coverage - Yes. You must log trips in ODDS and indicate whether you intend to deploy nonpelagic trawl gear.
- Full Coverage - No.

Do I have to indicate whether I intend to deploy nonpelagic trawl gear?
Yes, catcher vessels intending to deploy nonpelagic trawl gear during a trip must indicate this in ODDS.

Why is indicating the intent to deploy nonpelagic trawl gear required?

Once a vessel has indicated that nonpelagic trawl gear will be deployed during a trip, they are placed in the observer coverage selection pool for that trip.

What if I indicate that I intend to deploy nonpelagic trawl gear but only deploy pelagic trawl gear?
A catcher vessel in the trawl EM category that indicates they intend to deploy nonpelagic trawl gear on a trip, but instead deploys only pelagic gear during the trip, would be in violation of the requirement to use EM on all pelagic trawl trips, as specified in the definition of "Trawl EM Category" at § 679.2.

What are my obligations if I indicate that I intend to deliver catch to a tender vessel?
After indicating that you will deliver catch to a tender vessel, you must deliver all catch to a participating trawl EM category tender vessel. If you are unable to deliver to a trawl EM category tender vessel, you must deliver all catch to a participating trawl EM category shoreside processor or stationary floating processor.

Is a logbook required?
Yes. All trawl EM category catcher vessels, even those less than 60 feet LOA, are required to comply with logbook requirements found at § 679.5(c).

Are fish retained for personal use considered to be discards?
Yes. Personal use fish should be recorded as discard code "95" and should be logged in the logbook and fish ticket.

How do I know how my vessel is performing in the trawl EM category?
Vessel performance issues will be logged in ODDS by the EM service providers.

How will I be made aware of potential disapproval of my trawl EM category request?
If NMFS determines that a significant amount of these errors or malfunctions were preventable, it may result in NMFS disapproving the involved catcher vessel's request to participate in the trawl EM category. Vessels will be made aware if their overall performance in the trawl EM category may result in NMFS disapproving future requests to participate. At the end of a given fishing year, NMFS will place vessels with unsatisfactory performance in the "Notice of Improvement Pool", notifying them that failure to improve their behavior may result in disapproval.

A vessel operator may not be aware of some EM system malfunctions that occur. How will this be addressed?
Vessels are obligated to actively monitor the performance of their EM systems in order to prevent loss of data, as specified at § 679.51(g)(3). Vessels should work with their EM hardware

service provider to troubleshoot malfunctions while at-sea. There are many potential solutions that can temporarily resolve issues at-sea and prevent data loss until the EM hardware service provider is able to service the system in port. If a system malfunction is unable to be resolved through repair or troubleshooting, the vessel operator must contact NOAA Office of Law Enforcement (OLE) as outlined in their VMP.

If a potential violation is discovered during an investigation, OLE will assess, among other things, whether the vessel had the ability to address it by, for example, following EM system testing protocols outlined in their VMP.

What do I do if I am unable to transmit my Notice of Landing as described in my VMP?
If you are unable to transmit your Notice of Landing to the shoreside processor or stationary floating processor, you must notify OLE as specified in your VMP.

EM System Installation

How does a vessel owner or operator install the EM system?
Once a vessel is approved for the trawl EM category, the vessel owner or operator will make the vessel available to an EM hardware service provider for the installation of all required EM system components. During the installation, it is the vessel owner's responsibility to assist the EM hardware service provider with planning the best wiring routes and installing sensors that interface with the vessel's equipment, such as hydraulic oil pressure and engine oil pressure. The EM hardware service provider will install cameras in locations that meet the compliance objectives specified at § 679.51(g).

How do I obtain an EM hardware service provider?

- Partial coverage trawl EM category vessels will be assigned an EM hardware service provider by NMFS.
- Full coverage trawl EM category vessels must arrange and pay for their own EM hardware service provider services from a permitted EM hardware service provider.

Do I have to pay for EM review services?

- Partial coverage review expenses are covered by the Observer Fees specified at § 679.55.
- Full coverage vessels are subject to the new full coverage trawl EM category fee, which reimburses the agency for the cost of data review, storage, and transmission of data for full coverage vessels in the trawl EM category, as specified at § 679.56.

How do I pay the full coverage trawl EM fee?
NMFS will bill the full coverage video review fee in April or May each year, and collection will occur in mid-summer. Payment can be made via eFISH and more information may be found

here. If you have questions about how to pay fees, please email the NMFS Fee Program at: nmfs.akr.fees@noaa.gov.

What happens if I fail to pay the full coverage trawl EM fee?
Failure to pay fees will result in disapproval of future VMPs.

What are the specifications for the EM systems?
The specifications for the EM systems can be found on the EM website.

How long does it take to install EM equipment?
The length of time required to complete an installation varies and depends on the configuration of the vessel, the ability of vessel crew members to assist the EM hardware service provider in the installation, and other factors specific to each vessel. The vessel owner or operator should contact the EM hardware service provider to obtain an estimate of the time required to complete an installation aboard their vessel.

Where can EM system installations occur?
EM system installations can be routinely scheduled in the primary ports of Dutch Harbor and Kodiak, AK. The EM hardware service provider will notify the vessel owner or operator about scheduled times for installations in secondary ports.

Can video data be used to identify vessel personnel for non-fisheries related enforcement action?
Because the video recorded by the vessel EM system is required to be submitted to NMFS pursuant to the Magnuson-Stevens Fishery Conservation and Management Act (MSA), the video is subject to MSA's confidentiality provisions. Generally, NMFS is not authorized to release EM footage unless an exception set forth in section 402(b) of the MSA applies. The Freedom of Information Act is also applicable to any agency records, such as EM data, and along with the MSA, may require the agency to withhold EM data from public disclosure, as well.

Vessel Monitoring Plans

What is a Vessel Monitoring Plan (VMP)?
A VMP is a required document created by the vessel owner or operator with assistance from the EM hardware service provider that describes how fishing operations on the vessel must be conducted, including how gear is set, how catch is brought on board, and where catch is retained or discarded. It also describes how the EM system and associated equipment is configured to meet the data collection objectives and purpose of the trawl EM category. This includes camera locations to cover all fishing activities, any sensors to detect fishing activities, and any special catch handling requirements to ensure the compliance objectives can be met. The VMP also

includes methods to troubleshoot the EM system and instructions for ensuring the EM system is functioning properly prior to each haul. These required components of the VMP are detailed in the VMP template in which NMFS provides guidance to the EM hardware service provider and the vessel owner or operator. The VMP template is available on the electronic monitoring website. Failure to comply with a NMFS-approved VMP when directed fishing in a fishery subject to EM coverage is unlawful (§ 679.7(j)(1)(iii)).

What is the process for VMP development or approval?
Once approved for the trawl EM category, and prior to departing on a trip in the fishing year in which the vessel is approved for the trawl EM category, the vessel owner or operator must develop a VMP with the EM hardware service provider and submit a signed copy to NOAA Fisheries for approval. A vessel in the trawl EM category must have a copy, whether physical or electronic, of a valid NOAA Fisheries-signed VMP on board the vessel prior to fishing.

How can changes be made to a VMP during a fishing year?
After reviewing the data from a fishing trip in the trawl EM category, NOAA Fisheries may determine that the approved camera location(s) in the VMP do not meet compliance monitoring requirements. Additionally, the vessel operator may want to have a camera moved if it impedes their ability to fish, or the operator may reconfigure the vessel in a way that warrants changes to the cameras or VMP. Whether requested by the vessel owner or operator, or NOAA Fisheries, the vessel owner or operator is required to make any changes to the VMP with the assistance of the EM hardware service provider. These proposed amendments to the VMP must be signed and submitted to NOAA Fisheries for approval. The vessel will be allowed to begin another fishing trip, provided that NOAA Fisheries has received, and subsequently approved, the VMP amendments. If the amended VMP does not meet compliance monitoring needs, NOAA Fisheries will inform the EM hardware service provider and the vessel owner or operator that the VMP needs to be updated before another trip subject to EM may begin.

Do I need to print out my VMP?
While digital copies of your VMP are allowed in place of a physical copy of the VMP, it is highly recommended that you have a printed copy of your VMP on board as well. Vessel operators must be able to provide a copy of their NMFS-signed VMP to OLE, a NMFS-authorized officer, or other NMFS-authorized personnel immediately upon request. This means a digital copy would need to be already downloaded to a device (§ 679.7(j)(1)(ii)).

My VMP states I must submit my hard drive to NMFS after each of the first two trips; how often am I required to submit hard drives after that?
After submitting the hard drives for the first two fishing trips of the season, you may record up to five trips on a single hard drive and then submit the hard drive to NMFS if there is sufficient storage space. If there are no issues encountered during the review of your first two hard drives,

you may continue to submit hard drives with up to five trips recorded on a single hard drive if there is sufficient storage space. Vessels are only required to submit the hard drives for the first two fishing trips if indicated by their VMP under "Hard Drive Submission Frequency" on page 2.

What happens if there are delays when mailing a hard drive?
You should notify OLE immediately and provide the reason for not mailing your hard drive within 24 hours of landing. You are not responsible for delays caused by the United States Postal Service. Additionally, it is strongly encouraged that you keep obtain and keep a copy of your tracking number for the hard drives you ship.

EM Coverage Requirements

What is the definition of a fishing trip for the trawl EM category?
For the trawl EM category, under § 679.2, "*Fishing trip*" means: "(3)(iv) For a vessel in any EM category, the period of time that begins when the vessel with an empty hold departs a port or tender vessel until the vessel returns to a port or tender vessel and offloads or delivers all fish." This means that when you are in the trawl EM category your EM system must be active from the time that you depart port through the end of offload.

Can I change hard drives during my offload?
No. During the Exempted Fishing Permit, this was previously allowed. Vessels must change hard drives after the completion of the offload to prevent loss of data. While vessels are required by their VMP to ensure there is enough space for the next fishing trip, if the hard drive runs out of space mid-trip or mid-offload, the vessel should immediately change hard drives and notify OLE.

When am I required to use my EM system?
Vessels in the trawl EM category are required to use their EM system for all fishing trips where they are directed fishing for pollock using pelagic trawl gear or receiving deliveries of trawl EM category catch.

What if I am delivering to a mothership and would not normally be subject to observer coverage?
A catcher vessel that is delivering to a mothership is not considered to be in the trawl EM category and, therefore, is not subject to trawl EM category requirements. If a vessel intends to leave the mothership, directed fish for pollock with pelagic trawl gear, and then deliver to a shoreside processor instead of a mothership, they must have their EM system active from the time they depart the mothership, throughout fishing activities, and through offload at a shoreside processor.

What if I am in a non-Alaskan port and intend to go straight to the fishing grounds?
You must have your EM system activated for all fishing trips from port to port. For example: If you leave Anacortes, Washington and steam directly to the fishing grounds in the Bering Sea, you must activate your system in Anacortes, and leave it active until you finish offloading your catch at an Alaskan port.

What are my EM system responsibilities while in the trawl EM category?
Vessel owners or operators must maintain the EM system in working order, ensuring the EM system is powered and fully functional for the duration of a fishing trip as specified in their VMP. The EM system must be fully functional prior to each haul, including keeping cameras clean and unobstructed and ensuring the system is not tampered with. More information about these responsibilities can be found at § 679.51(g). Additional prohibitions exist to ensure the EM system functions properly and are usable for compliance monitoring (See § 679.7(j)).

What happens if an EM system malfunctions?
The VMP lists potential troubleshooting tips for common EM system malfunctions. When an EM system malfunctions, the vessel owner or operator must cease fishing immediately (or refrain from commencing a fishing trip, as applicable) and contact the EM hardware service provider. There are many potential solutions that can temporarily or fully resolve issues at-sea and prevent data loss until the EM hardware service provider is able to service the system in port.

If the vessel or EM hardware service provider cannot facilitate a repair and resolve the malfunction immediately, the vessel owner or operator must contact NOAA OLE as specified in their VMP. The final determination of whether a vessel must return to port or whether they may depart port will be made by OLE.

Can I have nonpelagic trawl onboard while participating in the trawl EM category?
Yes. A vessel may have a nonpelagic trawl on board, but may not deploy a nonpelagic trawl, while participating in the trawl EM category. Vessels with a nonpelagic trawl on board must ensure their EM system is fully functional while in Type I or Type II closure areas near Kodiak Island. EM systems monitor, among other things, the type of trawl each vessel deploys.

What are Type I and Type II closure areas?
Type I and II closure areas are specific areas in the Gulf of Alaska near Kodiak Island that prohibit vessels from having nonpelagic trawls on board while fishing within these areas with a pelagic trawl, as specified at § 679.22(b)(1). However, there is an exception for vessels in the trawl EM category. Vessels in the trawl EM category may have a nonpelagic trawl attached or onboard if the EM system is functioning, but are still prohibited from deploying nonpelagic trawls in these closure areas. Like other vessels, § 679.22(b)(1) does not prohibit vessels in the trawl EM category from deploying pelagic trawl gear in Type I or Type II closure areas.

End-of-Trip Requirements for Trawl EM Fishing Trips

How does a vessel owner or operator submit a hard drive?
The vessel owner or operator must submit the EM system hard drives to NOAA Fisheries in accordance with their VMP. Specific instructions for how often to submit hard drives, and how to ship hard drives, are included in a vessel's VMP.

How does a vessel operator obtain more hard drives?
The EM hardware service provider will provide vessels with hard drives. For vessels that are new to the trawl EM category, the service provider will supply vessels with several hard drives at the time the provider installs the EM system. For all other vessels in the EM category, the service provider will provide each vessel with hard drives at the start of the fishing season. The vessel owner or operator should contact the EM hardware service provider to obtain additional hard drives as needed.

Trawl EM Incentive Plan Agreements (TEM IPA)

What is a TEM IPA?
A TEM IPA is a voluntary private contract between catcher vessel owners or operators in the trawl EM partial coverage category that establishes incentives for these vessels to increase communication, avoid prohibited species catch (such as salmon), and maintain the intent of the pollock trip limits (§ 679.7(b)(2)), trawl gear performance standard (§ 679.7(a)(14)), and maximum retainable amount (MRA) overage prohibitions (§ 679.7(a)(16)). Under a TEM IPA, vessels participating in the trawl EM category must comply with pollock trip limits, the trawl gear performance standard, and MRAs even though they are exempted from those regulations. Compliance with these plans is monitored by industry groups. NMFS approves TEM IPAs to help ensure sustainable fishing practices.

Why must a TEM IPA require vessels to comply with pollock trip limits, the trawl gear performance standard, and MRAs, if catcher vessels in the trawl EM category are exempted from those regulatory provisions?
It was necessary to remove prohibitions regarding discards such as MRAs, pollock trip limits, and the trawl gear performance standard to improve catch retention. Vessels in the trawl EM category will deliver to processors catch that would otherwise be discarded at sea, thereby reducing the overall waste in the fishery while improving catch accounting of PSC due to sampling at shoreside processors and stationary floating processors. NMFS will still calculate MRAs to determine whether a vessel is directed fishing for nonpollock species and whether their behavior has changed under the trawl EM category, compared to their behavior with an observer on board. If NMFS determines that the TEM IPA is not effective in preventing vessel behavior changes, NMFS may not allow a vessel to participate in the trawl EM category in the following year(s).

Do I have to be part of the TEM IPA?
Catcher vessels directed fishing for pollock with pelagic trawl gear in the Gulf of Alaska or Aleutian Islands fisheries must be part of a TEM IPA (*i.e.*, vessels in the partial coverage trawl EM category). Catcher vessels directed fishing for pollock with pelagic trawl gear in the Bering Sea or Community Development Quota fisheries need not be party to a TEM IPA (*i.e.*, vessels in the full coverage trawl EM category). Vessels must indicate in their VMP which fishery(s) they will be operating in each year.

Where can I find the TEM IPA?
NMFS will make all approved TEM IPAs, approved modifications to TEM IPAs, and the list of participants in each approved TEM IPA available to the public on the NMFS Alaska Region Website. Modifications to approved TEM IPAs may be submitted to NMFS at any time and, once approved, the modifications will be posted on the NMFS Alaska Region Website.

What are the responsibilities of TEM IPA representatives?
TEM IPA representatives are responsible for submitting TEM IPAs. If a TEM IPA is approved, the TEM IPA representative must monitor vessel performance throughout the fishing year and hold vessels accountable to the terms of the TEM IPA. Each TEM IPA annual report will list whether vessels party to the TEM IPA have complied with the terms of the TEM IPA. The TEM IPA representative must submit a written report to the North Pacific Fishery Management Council each year, which will be publicly available. Each vessel's compliance with the applicable TEM IPA will be considered when NMFS reviews a vessel's annual request to enter the trawl EM category for the next fishing year (§ 679.57(b)(4)).

Shoreside and Stationary Floating Processors

What do I do with prohibited species from trawl EM category deliveries?
Prohibited species are to be handled as specified in your Catch Monitoring and Control Plan.

Who will determine how many observers each processing facility will be required to have?
Shoreside monitoring coverage rates will be determined based on the criteria outlined in the Annual Deployment Plan (ADP) process. Processing plants will review the criteria and propose the number of observers necessary to meet those criteria. NMFS will make final approval determinations.

What is a Catch Monitoring and Control Plan (CMCP)?
A CMCP is a plan submitted by a processing plant that requires NMFS approval. This document details how the processing plant will meet catch monitoring and control standards, including

observer communication requirements outlined at § 679.28. More information on CMCPs can be found on the Catch Weighing and Monitoring in Alaska website.

What is the process for CMCP development and approval?
Owners or managers of a shoreside or stationary floating processor receiving pollock deliveries from the trawl EM category must prepare, submit, and receive NMFS approval of a CMCP prior to receiving any trawl EM category deliveries. NMFS staff will work closely with processing facilities prior to the submission of CMCPs for approval to ensure that all regulatory requirements are met. CMCPs may be submitted by email or other electronic method approved by NMFS. Submission and approval of CMCPs typically occurs in May each year.

My CMCP was not approved, what is the appeal process?
The review of CMCPs is a collaborative process between NMFS and the processing facility. If NMFS does not approve a CMCP, the processing facility owner or manager may contact the agency to discuss shortcomings. CMCPs will be approved for up to one year, unless changes are deemed necessary. Should a CMCP be disapproved, the processor owner or manager may file an administrative appeal as set forth under the administrative appeals procedures described at § 679.43.

Disclaimer

While the NOAA Fisheries Alaska Regional Office strives to make the information in this document as accurate as possible, it does not make any claims, promises or guarantees about the accuracy, completeness, or adequacy of the contents, and expressly disclaims liability for errors and omissions in the contents. Members of the public are encouraged to read applicable published regulations.

Information appearing in this document:

- is for general informational purposes only;
- is not intended to provide, or be relied upon as, legal advice to any individual or entity;
- is not intended to represent or reflect an interpretation by NOAA Fisheries, NOAA, the U.S. Department of Commerce or the United States of any law or policy referenced; and
- is offered without prejudice to, or limitation on, any view or position that may be taken by NOAA Fisheries, NOAA, the U.S. Department of Commerce or the United States regarding any matter or issue.