

May 30, 2017

Mr. Dan Hull, Chair
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Dr. James Balsiger, Regional Administrator
NOAA Fisheries, Alaska Region
709 West Ninth Street
Juneau, AK 99802-1668

RE: Observer Coverage for trawl vessels

Dear Chairman Hull, Dr. Balsiger and Council Members:

Thank you for considering options to increase the reliability of fisheries management data obtained through the observer program. As part of this process, we encourage you to ensure full coverage for vessels using trawl gear in the Gulf of Alaska (GOA) and Bering Sea/Aleutian Islands (BSAI). There is urgency because this change must be implemented before the National Marine Fisheries Service (NMFS) begins developing the 2018 observer annual deployment plan (ADP) or negotiating long-term service contracts for groundfish observer providers this fall.

NMFS uses information from the North Pacific Observer Program to conserve and manage our fisheries resources and to ensure compliance with applicable laws and treaties. Observer data is “the only reliable and verifiable method available for NMFS to gain fishery discard and biological information on fish.”¹ Observer coverage, however, is not set to obtain the most accurate catch, bycatch or discard estimates. Nor is it optimized for reducing bias in high volume, high discard trawl fisheries. Instead, NMFS establishes the deployment rate for observers using the available budget and the amount of fishing that is expected to occur, with the goal of obtaining a representative sample of the groundfish catch.² Observer coverage should be tailored for different gear types and target species to best collect information for management.

The 2016 Observer Program Annual Report does not provide sufficient information about the effects of the observer coverage rates on the estimates of bycatch and discards to allow a meaningful analysis. We ask the NPFMC to urge NMFS to report catch and bycatch estimates with clearly defined standard deviation or standard error. This issue is particularly important now because the observer coverage rates for the 2017 season are much lower than those in 2016. As observers are deployed on fewer and fewer fishing trips, less catch is sampled and, accordingly, less discarded catch is observed. The observer coverage in the GOA trawl fleet, for example, dropped from 28% in 2016 to an estimated 18% in 2017.

¹ NMFS (National Marine Fisheries Service). 2016. 2017 Annual Deployment Plan for Observers in the Groundfish and Halibut Fisheries off Alaska. National Oceanic and Atmospheric Administration, 709 West 9th Street. Juneau, Alaska 99802.

² Alaska Fisheries Science Center and Alaska Regional Office. 2017. North Pacific Observer Program 2016 Annual Report. AFSC Processed Rep. 2017-07, 143 p. Alaska Fish. Sci. Cent., NOAA, Natl. Mar. Fish. Serv., 7600 Sand Point Way NE, Seattle WA 98115.

Fewer observers results in less accountability for individual vessels; especially for the high volume, high discard trawl fleet, accountability for each vessel is very important.

Moreover, partial observer coverage of catcher vessel bottom trawlers does not provide sufficient information from which to make reliable estimates of bycatch in the high volume, high discard bottom trawl fisheries. Individual hauls by trawlers are large, with catches between 5 and 15 metric tons.³ When trawlers target shallow-water flatfish and arrowtooth flounder, discards can sometimes represent over 50% of the haul.² Estimating bycatch and discards in the bottom trawl catcher vessel fleet is already problematic because large hauls and high discard rates mean that species comprising a smaller proportion of the catch, like prohibited species, may not even be detected by the observer.⁴ The GOA trawl fleet is still in the midst of controversial Chinook salmon and Pacific halibut bycatch management, and 2017 is a particularly inopportune time to leave observers off their boats. Underestimates of salmon or halibut bycatch impact corresponding stocks and associated fisheries, and overestimates can cause premature closures of the groundfish fisheries. The reasonable solution is more observer coverage to have better information.

Full observer coverage would also greatly decrease the “observer effect,” which can skew bycatch data in two ways: fishermen may under-report bycatch on unobserved hauls⁵ or fishermen may change their fishing behavior based on the presence or absence of an observer.⁶ Changes in behavior can include taking shorter trips with the observer, as was seen in 2016, when trawl vessels with observers took 12.8% fewer days per trip than unobserved trips.² Vessels may also fish with less effort to comply with coverage requirements while minimizing the amount of observed bycatch. Again, in 2016, trawl vessels with observers had fewer species “landed” or identified with observers onboard compared to the species composition of unobserved hauls offloaded in port. Finally, many vessels may choose to offload to tenders in order to avoid carrying observers, a problem particularly evident in the Western Gulf of Alaska and described Table 1. In 2016, there were no deliveries observed at King Cove in the partial coverage fleet, which means that there were no Chinook salmon bycatch sampled from those trawl trips, and it suggests that some boats are exploiting a loophole to avoid carrying observers and sampling their catch.

³ Cahalan, J.A. 2010. At-sea monitoring of commercial north Pacific groundfish catches: a range of observer sampling challenges. AFSC Quarterly Report Feature, July-August-September 2010.

⁴ Cahalan, Jennifer; Faunce, Craig; Bonney, Julie; and Swanson, Robert, "A field test of fisheries observer sampling methods for estimation of at-sea discards" (2016). Publications, Agencies and Staff of the U.S. Department of Commerce. Paper 531.

⁵ Burns, R. J., and G. N. Kerr. 2007. Observer effect on fisher bycatch reports in the New Zealand ling (*Genypterus blacodes*) bottom longlining fishery. *New Zealand Journal of Marine and Freshwater Research* 42: 23 – 32.

⁶ Faunce, C. H., and S. J. Barbeaux. 2011. The frequency and quantity of Alaskan groundfish catcher-vessel landings made with and without an observer. *ICES Journal of Marine Science* 68: 1757-1763.

Table 1. Gulf of Alaska pollock deliveries observed in 2016.⁷

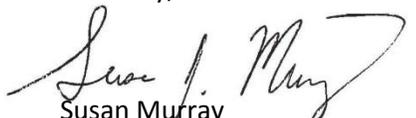
| Port | Total Pollock Deliveries | % Deliveries Observed |
|--|--------------------------|-----------------------|
| Kodiak | 1097 | 28.7 |
| Dutch Harbor and Akutan | 165 | 30.9 |
| King Cove, Sand Point, Floating Processors (IFP) | 911 | 6.6 |

Full coverage in the trawl fleet would benefit the fisheries. It would help managers minimize uncertainty in catch and bycatch estimates; streamline the management and logistical needs of the Observer Program; and even the playing field for all trawl vessels. In 2016, 56 bottom-trawlers in the GOA and 24 bottom trawlers in the BSAI were partially observed.⁸ Some of those vessels may have fished in both regions. Keeping a particular vessel in the full observer category all year simplifies management and enforcement. Partial coverage is less efficient on a cost per unit basis than full coverage.⁹ The Alaska Groundfish Data Bank has acknowledged that members of the trawl fleet are currently gaming the system.¹⁰ Full observer coverage would create more equity and fairness among the fleet.

Changes to the Observer Program must be made to reflect that minimizing Chinook salmon and Pacific halibut bycatch are conservation and management priorities. There is the need to improve bycatch estimates from the high discard bottom-trawl fisheries and to monitor fishery behavior with regard to prohibited species. Violations involving GOA salmon bycatch in the partial coverage fleet increased from 2015 to 2016.² Full observer coverage could be afforded the fleet by adding it to the full observer coverage categories defined in regulation.¹¹

Observer coverage is important for the health and reputation of Alaskan fisheries. The groundfish observer program continues to be an essential component of Alaska's federal fisheries management system. To ensure sustainable and lawful management into the future, we urge you to create a full observer coverage category for the trawl fleet.

Sincerely,



Susan Murray
Deputy Vice President, Pacific
Oceana

⁷ Adapted from Table 3-7. Alaska Fisheries Science Center and Alaska Regional Office. 2017. North Pacific Observer Program 2016 Annual Report. AFSC Processed Rep. 2017-07, 143 p. Alaska Fish. Sci. Cent., NOAA, Natl. Mar. Fish. Serv., 7600 Sand Point Way NE, Seattle WA 98115.

⁸ Table 4-1. Alaska Fisheries Science Center and Alaska Regional Office. 2017. North Pacific Observer Program 2016 Annual Report. AFSC Processed Rep. 2017-07, 143 p. Alaska Fish. Sci. Cent., NOAA, Natl. Mar. Fish. Serv., 7600 Sand Point Way NE, Seattle WA 98115.

⁹ Alaska Fisheries Science Center and Alaska Regional Office. 2017. North Pacific Observer Program 2016 Annual Report. AFSC Processed Rep. 2017-07, 143 p. Alaska Fish. Sci. Cent., NOAA, Natl. Mar. Fish. Serv., 7600 Sand Point Way NE, Seattle WA 98115.

¹⁰ NPFMC. 2016. Gulf of Alaska Trawl Bycatch Management Preliminary Economic Analysis. Pg. 225

¹¹ 50 CFR §679.51(a)(1) and (2)