



# NOAA FISHERIES



## Office of Law Enforcement Alaska Enforcement Division December Report To North Pacific Fisheries Management Council



October 2022 to September 2023

Report fisheries or marine mammal violations,  
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<https://www.fisheries.noaa.gov/topic/enforcement>

# NOAA Fisheries, Office of Law Enforcement, Alaska Division

## Report to the North Pacific Fishery Management Council

December 2023

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### Alaska Enforcement Division

U.S. Department of Commerce | National Oceanic and Atmospheric Administration | National Marine Fisheries Service

*Cover photo depicts a Juneau patrol with (left to right): Lt. Robert Marvelle, Advisor to the AA Sean McNally, Assistant Administrator for NOAA Fisheries Janet Coit, Auke Bay Lab/TSMRI Rob Suryan, AK Regional Administrator Jon Kurland, Humpback Whale and Whale SENSE Coordinator AK Protected Resources Division (PRD) Suzie Teerlink. And OLE AKD Assistant Director Nathan Lagerwey. Not pictured (photographer): Director of Communications Kate Naughten.*

## 1. Enforcement Operational Highlights

From April 1, 2023, to September 30, 2023, the Office of Law Enforcement (OLE), Alaska Division (AKD) conducted extensive patrols for the purposes of enforcement and education. In addition to daily dockside and vessel patrols, AKD conducted several multi-day patrols. Patrols were often coordinated with partners including U.S. Customs and Border Protection (CBP), U.S. Fish and Wildlife Service (USFWS), U.S. Coast Guard (USCG), Alaska Wildlife Troopers (AWT), and National Park Service (NPS). Collaborating with multiple agencies broadens enforcement and outreach opportunities and allows for cross-training and force-multiplication across agencies.

In April, Enforcement Officers with an Investigative Support Technician conducted an at-sea and remote port operation targeting IFQ vessels between Seward and Cordova. The team conducted one at-sea IFQ boarding with no violations, and three IFQ offloads were monitored; multiple violations were discovered and addressed during the boardings of IFQ vessels in port.

In May, Enforcement Officers launched P/V Cape Cleare in response to a reported entangled Western DPS Steller Sea lion in Kodiak, AK. The boat crew joined other Pinniped Entanglement Response Team members. The team successfully located and tranquilized the SSL with a dart gun before recovering the animal onboard a response boat and removing the line from around its neck.

The nonpelagic trawl operation, highlighted in OLE's June (2023) Report to Council, continued through June 10, 2023. The operation spanned six months; 43 trawl vessels were boarded, 29 trawl gear inspections were completed, 44 incidents/investigations were opened, and enforcement actions were taken in five investigations. Subsequent to the reported time in the June report, in the BSAI Red King Crab Savings Area, 34 more trips were monitored (total 738), and in the Gulf of Alaska 23 more (total 123). Council's determination in June that the codend falls outside of the regulatory definition of pelagic trawl provided clarification to inform ongoing and future investigations.

In June an Enforcement Officer conducted a Southeast Alaska Patrol with U.S. Coast Guard Cutter Douglas Denman. They conducted nine at-sea boardings of IFQ vessels, Charter Halibut vessels, multiple dockside boarding of IFQ vessels, and fish processing facility inspections. Checked all Fairweather coral habitat protection areas for bottom contact fishing gear, resulting in four violations.

In July, multiple Enforcement Officers conducted a patrol in Cordova, AK. During the course of this operation, nine vessels were boarded at sea, and 13 vessels were boarded at the dock while offloading, resulting in 22 violations documented. Nine salmon tender vessels were boarded with nine violations discovered. Four vessels had sport-caught halibut with commercial products destined for sale, and all halibut were mutilated. The team seized all illegal halibut from the tender vessels.

Operation Aleutian Arrival: from June 15 through September 5, 2023, NOAA OLE, Alaska Division, with OLE headquarters Investigative Analyst Team and the USCG, identified and monitored foreign flagged trampers operating within the US EEZ in Alaska. 47 multinational trampers were audited for potential IUU violations (using VMS, AIS, aerial patrols, and Product Transfer Reports (PTRs)), and four were

boarded. While no immediate violations were found, the operation yielded the development of streamlined internal processes and protocols to monitor tramper arrivals and imports into Alaska.

In August and September, an Enforcement Officer participated in Phase II of the joint enforcement Operation North Pacific Guard patrol (pictured right), underway on the Canadian civilian resupply ship Atlantic Condor. Operation North Pacific Guard is a multinational joint enforcement effort to combat Illegal, Unreported, and Unregulated fishing (IUU). The Phase II team totaled 28 crew including Newfoundland civilians, Department of Fisheries and Oceans Canada (DFO) officers, Canadian Coast Guard, interpreters, U.S. Coast Guard, and NOAA-OLE. Phase II primarily focused on targeting North Pacific Fisheries Commission (NPFC) and Western and Central Pacific Fisheries Commission (WCPFC) vessels. Nine boardings resulted in 11 violations identified related to Conservation and Management Measures (CMMs) for sharks, CMMs on Marine Pollution, and CMMs on Specification for the Marking and Identification of Fishing vessels.



## 2. Joint Enforcement Agreement

The purpose of the Joint Enforcement Agreement (JEA) between NOAA-OLE and the Alaska Wildlife Troopers (AWT) is to support enforcement of Federal laws and regulations under the Magnuson-Stevens Act, Endangered Species Act, Marine Mammal Protection Act, Lacey Act, and Northern Pacific Halibut Act. The reporting year for the JEA runs from July 1, 2022 through June 30, 2023. AWT supports Federal enforcement through the following Execution Priorities:

1. Observer Assault, Harassment, or Interference Violations
2. Operation Groundfish/Observer Pulse OP/IUU Patrol
3. Southeast Alaska Commercial/Charter/Subsistence -Halibut/Sablefish Patrol
4. Kodiak Medium Class Vessel Hook and Line Patrol
5. Marine Mammal Protection/Endangered Species Patrols
6. Med Class patrols Comm/Charter/Subsistence -Halibut/Sablefish
7. CDQ Inspections Northwestern and Bristol Bay Regions

AWT recorded the following actions in direct support of OLE and marine resource protection.

- 339 vessels boarded (commercial, charter, sportfish, and subsistence)
- 946 contacts (industry and public) during the execution of field operations
- 1671 additional contacts through 11 outreach activities
- Completed cases involving 6 Federal violations, 21 State warnings, and 30 State citations (most often jointly, state/federal managed fisheries)
- Referred 5 cases to OLE for potential/confirmed Federal violations (Primary OLE authority enforcement actions)



### 3. Outreach and Education

NOAA OLE outreach and education efforts facilitate and encourage responsible and sustainable uses of marine resources. NOAA Special Agents and Enforcement Officers visit communities throughout Alaska and utilize multiple online and in-person venues to deliver a strong message of resource protection. The table below provide highlights of formal outreach efforts from April 1, 2023, to September 30, 2023.



**Table 3-1: Outreach and Education**

Date	Description
April 12	OLE presented at the USCG Small Passenger Vessel Industry Day at the USCG Station Juneau. An Enforcement Officer presented a slide show, "Alaska Marine Mammal Viewing Guidelines and Regulations," and discussion about the Humpback whale 100 yard rule, avoiding marine mammal takes, and an overview of the Whale SENSE program.
April 19	An Enforcement Officer presented at the Juneau Charter Boat Operators Association on Charter Halibut Regulation review and changes for 2023.
April 21	An Enforcement Officer gave a virtual presentation to the Baruch College class 'Conservation Biology and Sustainable Development.' The presentation highlighted the history, mission, goals, responsibilities, and actions of NOAA OLE, Alaska Division in helping to maintain sustainable fisheries and protect marine habitat and wildlife.
May 5-7	OLE hosted a booth at the Kenai Peninsula Sports Rec and Trade Show in Soldotna to answer questions from the public about OLE, specific Charter, recreational, and commercial regulations, and marine mammal interactions.
May 11	OLE presented and discussed Whale SENSE, marine mammal regulations, and cooperative efforts at the Juneau Area Whale Watch Industry meeting with the major whale watching tour companies.
May 12	OLE attended the Ketchikan Alaska Department of Fish and Game (ADF&G) charter meeting. Approximately 30 operators were present. OLE provided education about GAF, Monday closures, and tagged fish.
May 17	An Enforcement Officer presented regulation changes for the 2023 season to the Sitka charter halibut fleet. Use of GAF fish and the new Monday closure days were discussed.
May 18	An Enforcement Officer gave a presentation at the Chiniak AK school to school-age children and teaching staff regarding marine mammal strandings. Local strandings were significant in the area; the outreach was to educate members of the public likely to encounter stranded mammals. The NOAA marine mammal stranding network guide,

	interesting marine mammal artifacts, and a PowerPoint and video of necropsies were shared. Children were “deputized” with NOAA Junior Officer badges.
June 10	An Enforcement Officer assisted the ADF&G and the U.S. Forest Service (USFS) in hosting the 2023 Swan Lake Junior Fishing Derby. Over 60 local children participated in the event, which included numerous prizes and hands-on fisheries education presentations.
June 17	An Enforcement Officer assisted ADF&G with a rockfish release device and pot gear clinic. EO answered questions regarding the subsistence halibut fishery and assisted anglers in applying for Subsistence Halibut Angler Registration Certificates (SHARCs).
June 27-31	Enforcement Officers staffed the NOAA OLE booth at the Southeast Alaska State Fair in Haines, AK. They answered questions and provided handouts to the approximate 3000 attendees.
August 24	OLE attended the Kodiak Trawl Fleet's Fall Meeting. OLE staff presented on topics including codend regulations, trawl performance standard, and documenting large-scale discards.
August 26	An Enforcement Officer joined the USFS, Sitka Police, Alaska State Troopers, and the USCG in hosting Sitka, AK's National Night Out. Over 600 members of the public attended the outreach event.
September 23	An Enforcement Officer hosted a booth at the annual USCG Base Kodiak Newcomer’s Welcome Aboard Fair to provide regulatory compliance assistance to new Kodiak residents. Topics included MMPA, ESA, and NPHA.
September 23: The	Compliance Analyst Liaison hosted a booth with the Protected Resources Division (PRD) at the Belugas Count! public outreach event. The event is designed to raise public awareness about ESA-listed NOAA Species in the Spotlight Cook Inlet Belugas and provide guidance about marine mammal legal and safe viewing.
September 28	OLE, GCES, USCG, Council staff, and Sustainable Fisheries attended an industry-hosted meeting in Kodiak to examine the differing types of pelagic and nonpelagic trawl gear. The Council motion to revise the pelagic trawl definition was discussed.

## 4. Case Updates

### **Notices of Violation and Assessment**

The NOAA Office of General Counsel, Enforcement Section (GCES) issued and served Notices of Violation and Assessment (NOVA) in the following civil administrative cases. A NOVA is not evidence of liability; it is only an allegation. A respondent is entitled to a fair hearing before an administrative law judge at which the government must prove liability by a preponderance of the evidence. Settled cases are noted.

AK2000930; F/V America’s Finest and F/V U.S. Intrepid – Owner Fishermen’s Finest, Inc. was charged under the Frank Lobiondo Coast Guard Authorization Act of 2018 with exceeding mothership processing caps of Flathead sole, Yellowfin sole, and Alaska plaice. A \$48,183 NOVA was issued, and the case settled for \$47,183.

AK2301745; M/V Phoenix – Owner Phoenix Processor LP and operator David Long were charged jointly and severally under the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) with failing to submit check-in/check-out reports or have an operational VMS on board while operating a mothership in the Bering Sea. A \$5,000 NOVA was issued, and the case settled for \$4,500.

AK2205725; C/P Cape Horn - Owner Cape Horn Vessel, LLC and operator Peter Pack were charged jointly and severally under the Magnuson-Stevens Act with fishing in a closed area. A \$26,801 NOVA was issued.

AK2201982; F/V Ocean Invictus – Owners Ocean Invictus, LLC, Ocean Bay, Inc. and Kilokak, Inc. and operator Robert E. Graham were charged jointly and severally under the Magnuson-Stevens Act with exceeding the 300,000 pound daily trip limit for Pollock in the Gulf of Alaska. A \$13,159 NOVA was issued, and the case settled for \$12,659.

AK2206212; F/V Alaska Beauty – Owner Jireh Fisheries, LLC and operator Curtis D. Waters were charged jointly and severally under the Magnuson-Stevens Act with fishing in a closed area. A \$9,429 NOVA was issued, and the case settled for \$9,141.50.

AK2207083; F/V St. Nicholas – Operator Michael Walter Lasiter was charged under the Northern Pacific Halibut Act (Halibut Act) with fishing for halibut in violation of the annual management measures by possessing on board a vessel Pacific halibut that had been filleted, mutilated, or otherwise disfigured. An \$8,000 NOVA was issued and became a final administrative decision due to default. A Notice of Intent to Deny Permits was issued for non-payment.

AK2207263; F/V Alaskan Pearl – Owner Alaskan Pearl Fisheries, LLC and operator Filaret I. Basargin were charged jointly and severally under the Halibut Act and the Magnuson-Stevens Act with retaining IFQ halibut in a regulatory area without sufficient IFQ onboard, failing to follow the check-out procedures in IPHC Area 4A, and failing to have VMS activated. A \$17,700 NOVA was issued, and the case settled for \$15,930. The proceeds of the violation, \$21,012.88, were forfeited by abandonment.

AK2106551; C/P Cape Horn – Crewman Ata loapo was charged under the Magnuson-Stevens Act with sexually harassing a female fisheries observer. A \$24,000 NOVA was issued.

AK2300579; F/V Alaskan Star – Owners Alaskan Star Fisheries, LLC, Sunrunner Alaska Corp., and Moriah Fishing, Inc., operator Abraham Brendan Sullivan, and vessel manager James Aaron Stevens were charged jointly and severally under the Magnuson-Stevens Act with failing to log four fishing trips in the Observer Deploy and Declare System (ODDS). A \$12,000 NOVA was issued, and the case settled for \$8,550.

AK2003678; F/V American Dynasty – Onboard medic Daniel Craig Azcarate was charged under the Magnuson-Stevens Act with sexually harassing a female fisheries observer. A \$36,000 NOVA was issued.

AK2202701; AK9728AM – As previously reported in the June 2023 Report, subsistence Fisherman Anthony P. Charles was charged under the Halibut Act with fishing for subsistence halibut in and off Alaska without a valid subsistence halibut registration certificate. A \$250 NOVA was issued. Since the

June 2023 Report, the NOVA became a final administrative decision due to default. The case has been referred to the U.S. Department of Treasury for collections.

AK2004131; F/V Thunderod – Charter vessel guide Dan Louis Brown and owner Thunderod, LLC were charged jointly and severally under the Halibut Act with failing to make their Alaska Department of Fish and Game (ADFG) Saltwater Sport Fishing Charter Trip Logbooks available for inspection upon request, failing to submit ADFG logbook sheets as required, being a charter vessel guide with charter anglers on board without a valid Charter Halibut Permit, and exceeding the angler endorsement on a Charter Halibut Permit. A \$12,500 NOVA was issued, and the case settled for \$11,250.

AK2107750 – Shoreside Processor OBI Seafoods, LLC, and plant manager James Nelson Turner were charged jointly and severally under the Magnuson-Stevens Act with exceeding the applicable Rockfish Program processing cap for sablefish by 4,987 pounds, a 1.4% overage. A \$12,000 NOVA was issued, and the case settled for \$10,800.

AK2104002; F/V Jean C – Operators and IFQ permit holders Harley Ethelbah and John Young and owners Moderation Enterprises, Inc., G & W Fish Co., and Strom Enterprises, LLC were charged jointly and severally under Magnuson-Stevens Act with illegally discarding IFQ sablefish caught with fixed gear when an IFQ permit holder onboard held unused sablefish IFQ and with failing to record discard information in the Daily Fishing Log. A \$26,500 NOVA was issued.

#### **Written Warnings**

GCES issued and served Written Warnings under the Magnuson-Stevens Act in the following cases:

AK2300845; F/V Tempo Sea – Crab IFQ permit holder Inter-Cooperative Exchange and operator Joseph A. Wright were issued a Written Warning for making an IFQ crab landing without a crab IFQ hired master permit.

AK2300846; F/V Farwest Leader – Crab IFQ permit holder Trident Affiliated Crab Harvesting Cooperative and operator Seth W. McCallum were issued a Written Warning for making an IFQ crab landing without a crab IFQ hired master permit.

## **5. Incident and Summary Settlement Information**

From October 1, 2022, to September 30, 2023, NOAA officers and agents opened 1544 incidents including 931 Magnuson Stevens Act, 454 Northern Pacific Halibut Act, 84 Marine Mammal Protection Act, 65 Endangered Species Act, and 10 involving other statutes and regulations (Lacey Act, Pacific Salmon Fishing Act, Port State Measures Act, and Whaling Convention Act., etc). (Figure 5-1)

The majority of incidents were closed or completed: of 1178 closed incidents, 582 recorded no violation and required no enforcement action. 366 incidents remain under investigation. (Figures 5-2 and 5-3).

**Figure 5-1. Incidents by percent October 1, 2022, to September 30, 2023, categorized by primary law.**



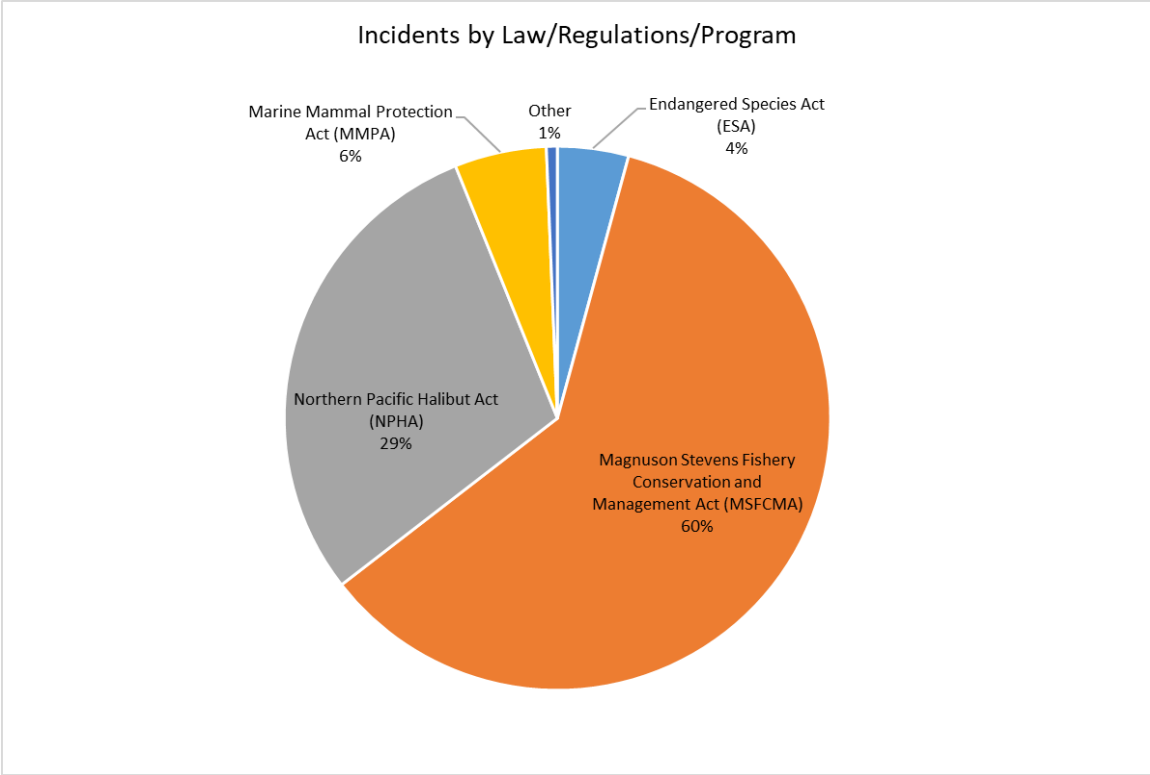


Figure 5-2. Incident dispositions for incidents created from October 1, 2022, to September 30, 2023

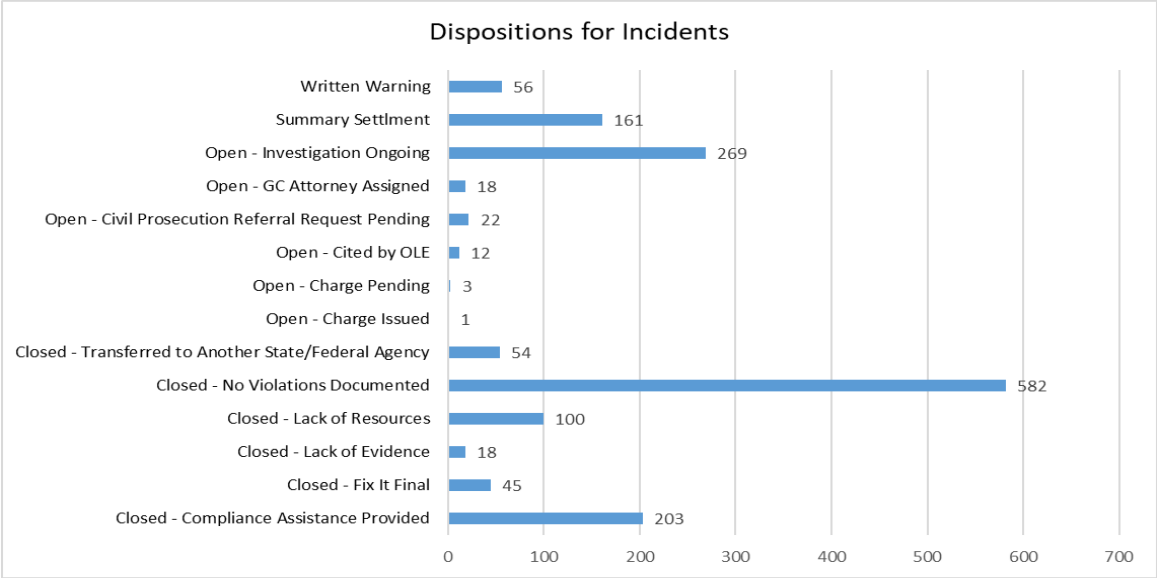
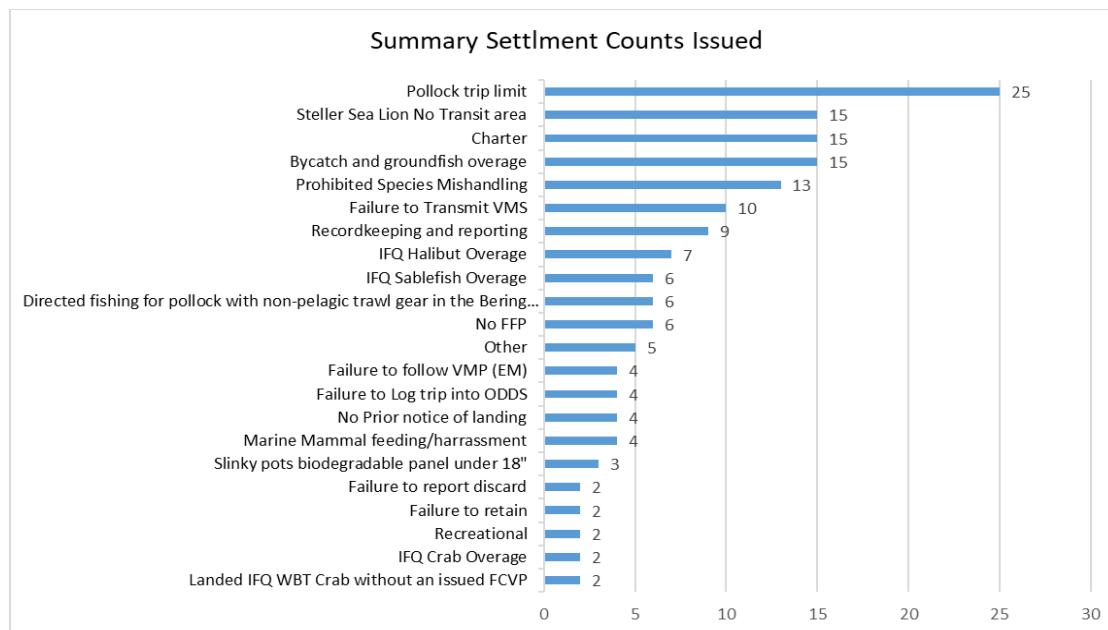


Figure 5-3. Summary Settlements Counts Issued (many incidents include multiple counts) October 1, 2022, to September 30, 2023.



\*Other includes counts of two or fewer related to chunked halibut, IFQ permit holder not present, selling sport caught halibut, and discarding unsorted pollock catch.

## 6. Observer Program

### Fiscal Year (FY) 2023 Observer Statement Analysis

OLE received 631 observer statements of potential violation(s) in FY23, with 4719 occurrences described (Table 6-1). By comparison, in FY22, OLE received 715 statements describing 4563 occurrences.

**Table 6-1. Status of Statements and Incidents** (data taken November 14, 2023).

Statements	Incidents	Statuses of ASSIGNED incidents
631 statements received and reviewed in FY2023; 62 statements did not document an actual violation (no incident created)	203 unique incidents created involving 452 statements assigned. 117 not yet assigned	108 Ongoing (301 statements)
		2 Forwarded for prosecution (5 statements)
		4 Written Warnings issued (7 statements)
		10 Summary Settlements issued (17 statements)
		28 Compliance Assistance Provided (48 statements)
		2 Closed - Referred to another Agency (5 statements)
		49 Closed - No OLE Action (69 statements)

'No OLE Action' includes incidents determined not to be a violation after investigation, insufficient evidence, insufficient resources, and incidents closed for info. Statements involving the same vessel, operator, and/or company are usually combined into a single incident.

### **Multi-year Observer Statement Comparative Analysis (Calendar Year: CY)**

Based on feedback from Council, OLE brings a new approach to examining multi-year data. The Observer Program Annual Report continues to assess rates of occurrences across fisheries presented by CY, and should be referenced for those data and accompanying trends. Council suggested to OLE that we examine the relative action levels based on the statement types. Rather than generating rates by FY, we perform this by examining case statuses derived from observer statements, comparing four CYs: 2019, 2020, 2021, and 2022. The reader will observe that we do not include 2023 in these tables; that is because 1) CY is not complete, and 2) a much higher percentage of those incidents remain “ongoing” as investigations are made, and would not provide meaningful data. We categorize statuses based on the “brief synopsis,” which lists the overarching management program under which statements were submitted. Management programs typically apply to multiple fleets, often in multiple FMP areas, and may include plant operations. Nested under each program are the disposition (action level by OLE), and statement headings. Listed by CY are the number of statements, number of occurrences, and numbers of incidents with the associated action. Note that under the “Unique Incidents” columns, we depict the statements that contributed to an incident with an “x.” The total numbers do not necessarily add up to the total at the top of each disposition, so we thought numerical presentation would be misleading. That is because multiple statements (and statement headings) may be combined to create a single incident, which then carries a single disposition for the whole incident. The correct number of unique incidents (investigations) under each management program is summarized at the top of each disposition. Due to the aforementioned fact that a single disposition (the highest level of action for the entire incident, regardless of the number of statements and the handling of each potential violation) is carried, the number of higher level actions (e.g. Compliance Assistance, Written Warning, Summary Settlement, NOVA) are potentially overrepresented by the data. For example, if a single incident has a disposition of Summary Settlement, and five different statements (with different headings) fed that investigation, all five data points (statements) would carry the disposition of Summary Settlement. We are working to gain more granularity in our ability to access more resolved data from our new Electronic Case Management System in future.

A final note: in August of 2023, after years of development and collaboration, the Observer Program and OLE initiated a project changing the structure of the statement headings feeding the statement database, updated the data entry flow for observers recording statements, and updated fields in the statement database itself. This project continues to evolve as we seek to improve the utility and accuracy of the statement data provided by observers. The fallout is that, in future analyses, our ability to compare like data from across multiple years prior to rollout will be limited. 2023, and following, will therefore probably mark a new analytical approach for future YoY trend tracking.

Management programs are not presented in any specific order of size or importance. Action levels are presented alphabetically rather than by order of focus or order of severity. Actions from lowest to highest severity:

- Compliance Assistance and Fix-It
- Written Warning (And GCES WW)
- Summary Settlement (And GCES SS)
- Sent to GCES for civil/admin prosecution; severity levels vary based on result: declined<WW<SS< Notice of Violation Assessment.

The following dispositions (investigation statuses) are omitted from the presentation as they do not indicate OLE enforcement “actions,” though many resulted from investigations:

- No Violation (no incident created) and No Violation (after investigation)
- Closed-Complaint Unfounded; Closed-Lack of Evidence, Closed-lack of Resources, Closed-Referred to Another Agency
- OLE-Ongoing

The totals listed for each Management Program presenting the full sum of statements, occurrences, and unique incidents are preserved for inference.

**Table 6-2. Amendment 80/Flatfish/Investigation**

Management Program, Action Level (Disposition), and Statement Heading	2019			2020			2021			2022		
	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents
<b>A80/Flatfish/Investigation</b>	<b>183</b>	<b>1277</b>	<b>66</b>	<b>132</b>	<b>765</b>	<b>48</b>	<b>144</b>	<b>796</b>	<b>49</b>	<b>230</b>	<b>1874</b>	<b>53</b>
<b>OLE-Compliance Assistance Provided</b>	<b>122</b>	<b>1074</b>	<b>39</b>	<b>64</b>	<b>311</b>	<b>24</b>	<b>82</b>	<b>437</b>	<b>27</b>	<b>83</b>	<b>329</b>	<b>16</b>
Amendment 80	45	694	x	22	45	x	26	116	x	20	52	x
Contractor Problems	2	4	x				3	5	x			
Disruptive/Bothersome Behavior - Conflict Resolved	5	6	x	3	7	x	4	4	x	2	12	x
Failure to Notify	4	6	x	4	14	x				6	8	x
Halibut Deck Sorting				4	8	x	5	26	x	14	60	x
Harassment - Sexual	2	2	x	1	3	x						
Inadequate Accommodations	3	3	x	1	1	x	2	2	x	4	9	x
Interference/Sample Biasing	5	33	x	5	9	x	2	3	x	2	3	x
Intimidation, coercion, hostile work environment	6	38	x									
Intimidation; coercion; hostile work environment							2	3	x	4	4	x
IR/IU	2	52	x							2	20	x
Marine Mammal-Feeding				6	160	x	10	183	x			
Marine Mammal-Harassment							1	2	x			
Miscellaneous Violations										1	2	x
Prohibited Species - Mishandling	21	99	x	8	16	x	5	10	x	9	15	x
Reasonable Assistance	5	7	x	1	1	x				2	105	x
Record Keeping and Reporting	7	15	x	5	43	x	11	64	x	2	4	x
Restricted Access										1	18	x
Safety-NMFS	14	114	x	3	3	x	10	18	x	14	17	x
Sample Bias-Marine Mammals	1	1	x	1	1	x	1	1	x			
<b>OLE-Sent to GCES for civil/admin prosecution</b>	<b>5</b>	<b>36</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>2</b>	<b>2</b>	<b>3</b>	<b>2</b>	<b>4</b>	<b>5</b>	<b>2</b>
Amendment 80	2	3	x	1	2	x						
Failure to Notify	1	1	x									
Harassment - Sexual				1	1	x	1	2	x	2	2	x
Harassment-Assault							1	1	x	2	3	x
Prohibited Species - Mishandling	2	32	x									
<b>OLE-SS Paid</b>	<b>2</b>	<b>2</b>	<b>1</b>									
Amendment 80	2	2	x									
<b>OLE-WW Affirmed</b>				<b>2</b>	<b>38</b>	<b>1</b>	<b>2</b>	<b>2</b>	<b>2</b>			
Amendment 80							1	1	x			
Halibut Deck Sorting				1	2	x						
Intimidation; coercion; hostile work environment							1	1	x			
Marine Mammal-Feeding				1	36	x						

Though the statements in this category generally increased over the 4 years, the unique incidents with dispositions of Compliance Assistance decreased from 2019 to 2020, then held relatively steady through 2022, while the number of total actions decreased by more than half. Cases forwarded to GCES remained steady.



**Table 6-3. Amendment 80/Rockfish/Investigation**

Management Program, Action Level (Disposition), and Statement Heading	2019			2020			2021			2022		
	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents
<b>A80/Rockfish/Investigation</b>	<b>59</b>	<b>338</b>	<b>24</b>	<b>15</b>	<b>76</b>	<b>9</b>	<b>24</b>	<b>82</b>	<b>12</b>	<b>22</b>	<b>41</b>	<b>16</b>
<b>OLE-Compliance Assistance Provided</b>	<b>42</b>	<b>276</b>	<b>13</b>	<b>4</b>	<b>18</b>	<b>1</b>	<b>15</b>	<b>69</b>	<b>8</b>	<b>8</b>	<b>10</b>	<b>7</b>
Amendment 80	15	41	x	1	2	x	7	37	x	6	8	x
Contractor Problems	1	15	x									
Disruptive/Bothersome Behavior - Conflict Resolved	1	47	x				2	21	x			
Failure to Notify	4	6	x	1	3	x						
Halibut Deck Sorting										2	2	x
Harassment - Sexual							1	2	x			
Inadequate Accomodations	1	2	x				1	2	x			
Interference/Sample Biasing	4	7	x									
Intimidation, coercion, hostile work environment	4	65	x	1	12	x						
Intimidation; coercion; hostile work environment							1	2	x			
Miscellaneous Violations							1	1	x			
Prohibited Species - Mishandling	2	6	x									
Prohibited Species - Retaining	1	1	x									
Record Keeping and Reporting	3	32	x				2	4	x			
Restricted Access												
Safety-NMFS	6	54	x	1	1	x						
<b>OLE-Sent to GCES for civil/admin prosecution</b>							<b>1</b>	<b>1</b>	<b>1</b>			
Harassment - Sexual							1	1	x			
<b>OLE-WW Affirmed</b>										<b>1</b>	<b>2</b>	<b>1</b>
Amendment 80										1	2	x

Statements, and statements resulting in Compliance Assistance, dropped in this management program as well following 2019.

**Table 6-4. Open Access/Flatfish/Investigation**

Management Program, Action Level (Disposition), and Statement Heading	2019			2020			2021			2022		
	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents
<b>OA/Flatfish/Investigation</b>	<b>24</b>	<b>66</b>	<b>16</b>	<b>8</b>	<b>119</b>	<b>5</b>				<b>5</b>	<b>36</b>	<b>2</b>
<b>OLE-Compliance Assistance Provided</b>	<b>9</b>	<b>28</b>	<b>6</b>	<b>1</b>	<b>1</b>	<b>1</b>						
Gulf of Alaska Salmon	1	1	x									
Prohibited Species - Mishandling	4	22	x									
Record Keeping and Reporting	4	5	x									
Safety-NMFS				1	1	x						
<b>OLE-SS Paid</b>				<b>2</b>	<b>9</b>	<b>1</b>						
Intimidation, coercion, hostile work environment				1	1	x						
Prohibited Species - Mishandling				1	8	x						
<b>OLE-WW Affirmed</b>	<b>4</b>	<b>5</b>	<b>3</b>	<b>1</b>	<b>4</b>	<b>1</b>						
Catcher Processer Longline	1	1	x									
Interference/Sample Biasing	1	2	x									
IR/IU	1	1	x									
Prohibited Species - Mishandling	1	1	x									
Record Keeping and Reporting				1	4	x						

Open Access Flatfish shows a declining trend in total statements and statements resulting in action by OLE across years.

**Table 6-5. American Fisheries Act/Pollock/Investigation**

Management Program, Action Level (Disposition), and Statement Heading	2019			2020			2021			2022		
	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents
<b>AFA/Pollock/Investigation</b>	<b>279</b>	<b>3105</b>	<b>120</b>	<b>220</b>	<b>1061</b>	<b>94</b>	<b>199</b>	<b>1533</b>	<b>65</b>	<b>142</b>	<b>1094</b>	<b>63</b>
<b>GCES-WW Affirmed</b>				<b>3</b>	<b>3</b>	<b>1</b>	<b>9</b>	<b>53</b>	<b>1</b>			
AFA							1	10	x			
Amendment 91 salmon				1	1	x	1	1	x			
Failure to Notify				1	1	x						
Inadequate Accommodations							1	1	x			
Prohibited Species - Retaining							1	1	x			
Record Keeping and Reporting							1	3	x			
Safety-NMFS				1	1	x	4	37	x			
<b>OLE-Compliance Assistance Provided</b>	<b>97</b>	<b>739</b>	<b>39</b>	<b>50</b>	<b>240</b>	<b>23</b>	<b>52</b>	<b>820</b>	<b>15</b>	<b>33</b>	<b>239</b>	<b>6</b>
AFA	15	61	x	2	2	x	4	7	x	4	108	x
Amendment 91 salmon	29	89	x	6	25	x	4	6	x	4	5	x
Contractor Problems	2	2	x				1	3	x			
Disruptive/Bothersome Behavior - Conflict Resolved	6	10	x	7	10	x	2	7	x			
Failure to Notify	4	76	x	3	5	x	10	186	x	9	49	x
Harassment - Sexual				1	1	x	4	5	x			
Inadequate Accommodations							1	1	x	2	41	x
Interference/Sample Biasing	6	17	x	6	13	x				2	4	x
Intimidation, coercion, hostile work environment	5	11	x	9	36	x						
Intimidation; coercion; hostile work environment							4	12	x	1	1	x
IR/IU	1	70	x									
Marine Mammal-Feeding							3	404	x			
Miscellaneous Violations	1	1	x	2	2	x	1	1	x			
Prohibited Species - Mishandling	2	2	x	1	1	x	2	4	x	1	1	x
Prohibited Species - Retaining	3	3	x	2	60	x	2	13	x			
Reasonable Assistance	3	14	x	6	68	x	2	2	x	4	6	x
Record Keeping and Reporting	17	376	x	2	3	x	2	96	x	3	17	x
Restricted Access	1	4	x				1	1	x	1	5	x
Safety-NMFS	2	3	x	3	14	x	8	71	x	2	2	x
Seabird-Harassment							1	1	x			
<b>OLE-Fix It Completed</b>							<b>1</b>	<b>1</b>	<b>1</b>			
Intimidation; coercion; hostile work environment							1	1	x			
<b>OLE-Sent to GCES for civil/admin prosecution</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>3</b>	<b>8</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>
Amendment 91 salmon	1	1	x									
Harassment - Sexual				1	1	x	1	1	x	1	1	x
Intimidation, coercion, hostile work environment				2	7	x						

**Table 6-5 continued. American Fisheries Act/Pollock/Investigation**

Management Program, Action Level (Disposition), and Statement Heading	2019			2020			2021			2022		
	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents
<b>AFA/Pollock/Investigation</b>	<b>279</b>	<b>3105</b>	<b>120</b>	<b>220</b>	<b>1061</b>	<b>94</b>	<b>199</b>	<b>1533</b>	<b>65</b>	<b>142</b>	<b>1094</b>	<b>63</b>
<b>OLE-SS Paid</b>	<b>11</b>	<b>16</b>	<b>4</b>	<b>26</b>	<b>178</b>	<b>9</b>	<b>24</b>	<b>50</b>	<b>7</b>	<b>25</b>	<b>143</b>	<b>12</b>
AFA				4	54	x	3	4	x			
Amendment 91 salmon	3	5	x	12	58	x	13	36	x	14	33	x
Disruptive/Bothersome Behavior - Conflict Resolved							2	2	x			
Failure to Notify				1	4	x	1	1	x	4	55	x
Harassment-Assault	1	1	x									
Inadequate Accomodations							1	1	x			
Interference/Sample Biasing	1	1	x									
Intimidation, coercion, hostile work environment	2	3	x	1	1	x						
IR/IU	1	1	x									
Miscellaneous Violations	1	1	x	1	1	x						
Prohibited Species - Mishandling										1	1	x
Prohibited Species - Retaining				2	51	x						
Reasonable Assistance				1	2	x						
Record Keeping and Reporting				1	2	x	3	5	x	4	49	x
Safety-NMFS	2	4	x	3	5	x	1	1	x	2	5	x
<b>OLE-WW Affirmed</b>	<b>23</b>	<b>1290</b>	<b>6</b>	<b>42</b>	<b>140</b>	<b>8</b>	<b>25</b>	<b>194</b>	<b>6</b>	<b>1</b>	<b>3</b>	<b>1</b>
AFA	2	975	x	2	2	x	2	3	x			
Amendment 91 salmon	14	281	x	6	10	x	6	133	x			
Disruptive/Bothersome Behavior - Conflict Resolved				1	14	x	2	5	x			
Failure to Notify	3	18	x	5	14	x	1	1	x			
Inadequate Accomodations				6	26	x	1	2	x			
Interference/Sample Biasing	1	2	x	2	2	x	2	6	x			
Intimidation, coercion, hostile work environment	1	11	1	5	11	x						
Intimidation; coercion; hostile work environment							2	7	x	1	3	x
IR/IU							1	23	x			
Miscellaneous Violations							1	1	x			
Prohibited Species - Mishandling				1	17	x						
Reasonable Assistance				2	5	x						
Record Keeping and Reporting	1	2	x	6	19	x	3	9	x			
Restricted Access				1	1	x	1	1	x			
Safety-NMFS	1	1	x	5	19	x	3	3	x			
<b>SS Issued</b>										<b>3</b>	<b>3</b>	<b>1</b>
Amendment 91 salmon										1	1	x
Reasonable Assistance										1	1	x
Record Keeping and Reporting										1	1	x

AFA Pollock statements and actions decreased through the years, though the number of cases resulting in Summary Settlements is generally increasing.

Table 6-6. IFQ/Halibut/Investigation

Management Program, Action Level (Disposition), and Statement Heading	2019			2020			2021			2022		
	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents
<b>IFQ/Halibut/Investigation</b>				9	53	5	36	123	24	40	241	26
<b>OLE-Compliance Assistance Provided</b>							5	23	3	9	56	5
Failure to Notify										1	8	x
IFQ Retention							1	19	x	3	17	x
Intimidation; coercion; hostile work environment										1	1	x
Prohibited Species - Mishandling							1	1	x	1	12	x
Record Keeping and Reporting							2	2	x	2	16	x
Safety-NMFS							1	1	x	1	2	x
<b>OLE-Sent to GCES for civil/admin prosecution</b>				1	16	1						
Prohibited Species - Mishandling				1	16	x						
<b>OLE-SS Paid</b>							3	9	3	4	34	4
IFQ Retention							2	2	x	1	1	x
IR/IU										1	1	x
Prohibited Species - Mishandling							1	7	x	1	10	x
Seabird-Avoidance Measures										1	22	x
<b>OLE-VW Affirmed</b>							2	4	1			
IFQ Retention							1	3	x			
Inadequate Accomodations							1	1	x			
<b>Written Warning Issued</b>							1	1	1	1	3	1
IFQ Retention							1	1	x			
Prohibited Species - Mishandling										1	3	x

There is a general increase throughout the years in statements resulting in increasing incidents with dispositions of Compliance Assistance and Summary Settlements.

**Table 6-7. Rockfish Program/Rockfish/Investigation**

Management Program, Action Level (Disposition), and Statement Heading	2019			2020			2021			2022		
	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents
<b>Rockfish Program/Rockfish/Investigation</b>	41	137	29	24	48	12	33	52	18	12	29	10
<b>OLE-Compliance Assistance Provided</b>	13	82	10	3	12	1	10	13	3	3	3	3
Amendment 80							1	1	x			
Disruptive/Bothersome Behavior - Conflict Resolved							1	1	x	1	1	x
Failure to Notify	3	12	x	1	3	x				1	1	x
Inadequate Accomodations							1	1	x	1	1	x
Interference/Sample Biasing	1	1	x				1	1	x			
Intimidation; coercion; hostile work environment							1	3	x			
Prohibited Species - Mishandling	2	4	x				3	3	x			
Reasonable Assistance	1	1	x	1	4	x						
Record Keeping and Reporting	2	41	x	1	5	x						
Safety-NMFS	4	23	x				2	3	x			
<b>OLE-Sent to GCES for civil/admin prosecution</b>							3	3	2	3	3	1
Gulf of Alaska Salmon							2	2	x	1	1	x
Harassment - Sexual							1	1	x			
Prohibited Species - Mishandling										1	1	x
Rockfish Program										1	1	x
<b>OLE-SS Paid</b>				1	2	1				3	6	3
Disruptive/Bothersome Behavior - Conflict Resolved				1	2	x						
Gulf of Alaska Salmon										2	3	x
Record Keeping and Reporting										1	3	x
<b>OLE-VW Affirmed</b>	2	2	1	5	8	2	1	1	1			
Disruptive/Bothersome Behavior - Conflict Resolved				1	1	x	1	1	x			
Failure to Notify				1	2	x						
Interference/Sample Biasing	1	1	x									
Intimidation, coercion, hostile work environment				1	3	x						
Prohibited Species - Mishandling	1	1	x	1	1	x						
Reasonable Assistance				1	1	x						

There is general decline in overall statements and incidents, as well as actions seen for the Rockfish Program.

**Table 6-8. Open Access/Pollock/Investigation**

Management Program, Action Level (Disposition), and Statement Heading	2019			2020			2021			2022		
	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents
<b>OA/Pollock/Investigation</b>	<b>74</b>	<b>98</b>	<b>27</b>	<b>67</b>	<b>465</b>	<b>22</b>	<b>63</b>	<b>625</b>	<b>17</b>	<b>79</b>	<b>177</b>	<b>20</b>
<b>OLE-Compliance Assistance Provided</b>	<b>43</b>	<b>55</b>	<b>10</b>	<b>25</b>	<b>307</b>	<b>7</b>	<b>21</b>	<b>197</b>	<b>2</b>	<b>18</b>	<b>38</b>	<b>6</b>
Disruptive/Bothersome Behavior - Conflict Resolved	2	3	x	2	2	x						
Failure to Notify	3	3	x	4	58	x	3	12	x	3	3	x
Gulf of Alaska Salmon	11	16	x	8	130	x	3	46	x	5	16	x
Harassment - Sexual				1	5	x						
Inadequate Accommodations				1	1	x	1	40	x	1	1	x
Interference/Sample Biasing	1	1	x				1	3	x	1	1	x
Intimidation; coercion; hostile work environment							1	3	x			
IR/IU										1	8	x
Marine Mammal-Feeding							3	3	x	1	1	x
Miscellaneous Violations										1	1	x
Reasonable Assistance	9	10	x	3	23	x	3	74	x			
Record Keeping and Reporting	16	21	x	2	11	x	5	14	x			
Restricted Access				1	1	x						
Safety-NMFS	1	1	x	3	76	x				5	7	x
Seabird-Harassment							1	2	x			
<b>OLE-SS Paid</b>							<b>1</b>	<b>1</b>	<b>1</b>	<b>13</b>	<b>19</b>	<b>2</b>
Disruptive/Bothersome Behavior - Conflict Resolved										2	2	x
Failure to Notify										2	6	x
Gulf of Alaska Salmon										5	6	x
Intimidation; coercion; hostile work environment							1	1	x			
Record Keeping and Reporting										2	3	x
Safety-NMFS										2	2	x
<b>OLE-WW Affirmed</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>2</b>	<b>1</b>						
Gulf of Alaska Salmon				2	2	x						
Prohibited Species - Mishandling	1	1	x									

Numbers of statements for the category and proportion that generated incidents is relatively stable, but the number of statements resulting in Compliance Assistance.

**Table 6-9. IFQ/Sablefish/Investigation**



Management Program, Action Level (Disposition), and Statement Heading	2019			2020			2021			2022		
	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents
<b>IFQ/Sablefish/Investigation</b>	<b>105</b>	<b>363</b>	<b>75</b>	<b>20</b>	<b>156</b>	<b>12</b>	<b>49</b>	<b>227</b>	<b>31</b>	<b>59</b>	<b>284</b>	<b>39</b>
<b>OLE-Compliance Assistance Provided</b>	<b>29</b>	<b>64</b>	<b>21</b>	<b>3</b>	<b>25</b>	<b>2</b>	<b>7</b>	<b>20</b>	<b>5</b>	<b>13</b>	<b>61</b>	<b>9</b>
Catcher Processor Longline	1	1	x									
Disruptive/Bothersome Behavior - Conflict Resolved	2	2	x							1	2	x
Failure to Notify	1	1	x							1	1	x
IFQ Retention	3	13	x	1	19	x	3	7	x	4	27	x
Inadequate Accommodations							1	1	x			
Interference/Sample Biasing	3	5	x							1	1	x
Marine Mammal-Harassment	1	1	x									
Miscellaneous Violations	1	2	x									
Reasonable Assistance	1	3	x	1	5	x				1	1	x
Record Keeping and Reporting	8	23	x	1	1	x				3	27	x
Restricted Access	1	2	x									
Rockfish Program										1	1	x
Safety-NMFS	4	4	x				2	2	x	1	1	x
Seabird-Avoidance Measures	3	7	x				1	10	x			
<b>OLE-Sent to GCES for civil/admin prosecution</b>	<b>1</b>	<b>3</b>	<b>1</b>				<b>3</b>	<b>25</b>	<b>1</b>	<b>3</b>	<b>11</b>	<b>1</b>
IFQ Retention	1	3	x				2	21	x	2	10	x
Record Keeping and Reporting										1	1	x
Safety-NMFS							1	4	x			
<b>OLE-SS Paid</b>	<b>11</b>	<b>90</b>	<b>9</b>				<b>4</b>	<b>16</b>	<b>3</b>	<b>2</b>	<b>2</b>	<b>2</b>
IFQ Retention	2	24	x				1	8	x			
Intimidation; coercion; hostile work environment										1	1	x
IR/IU	1	1	x									
Marine Mammal-Feeding							1	3	x			
Prohibited Species - Mishandling	4	13	x							1	1	x
Record Keeping and Reporting	1	39	x									
Safety-NMFS	1	1	x				2	5	x			
Sample Bias-Seabirds	1	1	x									
Seabird-Avoidance Measures	1	11	x									
<b>OLE-WW Affirmed</b>	<b>10</b>	<b>36</b>	<b>6</b>	<b>5</b>	<b>47</b>	<b>1</b>	<b>2</b>	<b>4</b>	<b>1</b>			
Failure to Notify	1	2	x	1	1	x						
IFQ Retention	1	18	x				1	1	x			
Inadequate Accommodations	1	1	x									
Interference/Sample Biasing				1	17	x						
Intimidation, coercion, hostile work environment				1	4	x						
Marine Mammal-Harassment	1	1	x									
Reasonable Assistance	1	1	x									
Record Keeping and Reporting	1	1	x	1	23	x	1	3	x			
Safety-NMFS				1	2	x						
Seabird-Avoidance Measures	3	10	x									
Seabird-Harassment	1	2	x									
<b>Written Warning Issued</b>										<b>1</b>	<b>5</b>	<b>1</b>
IFQ Retention										1	5	x

There was a sharp decline in statements and actions from 2019 to 2020, and then a stepped increase thereafter (as fisheries returned to more normal operations and coverage levels).

Table 6-10. Open Access/Pacific Cod/Investigation

Management Program, Action Level (Disposition), and Statement Heading	2019			2020			2021			2022		
	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents
<b>OA/Pacific cod/Investigation</b>	<b>130</b>	<b>907</b>	<b>83</b>	<b>57</b>	<b>332</b>	<b>33</b>	<b>70</b>	<b>486</b>	<b>35</b>	<b>96</b>	<b>639</b>	<b>58</b>
<b>OLE-Compliance Assistance Provided</b>	<b>41</b>	<b>199</b>	<b>26</b>	<b>15</b>	<b>66</b>	<b>11</b>	<b>17</b>	<b>101</b>	<b>7</b>	<b>20</b>	<b>66</b>	<b>14</b>
Amendment 80	4	9	x				1	11	x			
Catcher Processor Longline	3	7	x	1	10	x	1	23	x	1	1	x
Disruptive/Bothersome Behavior - Conflict Resolved	2	2	x				2	3	x	2	2	x
Failure to Notify	9	13	x	3	6	x	1	2	x	2	2	x
Gulf of Alaska Salmon							1	1	x			
Harassment - Sexual							1	1	x			
Inadequate Accomodations							1	1	x	1	1	x
Interference/Sample Biasing	2	5	x							2	2	x
Intimidation, coercion, hostile work environment	2	3	x	1	5	x						
Intimidation; coercion; hostile work environment							1	3	x			
IR/IU							1	15	x			
Miscellaneous Violations							1	1	x			
Prohibited Species - Mishandling	8	33	x	6	24	x	3	6	x	5	14	x
Reasonable Assistance	3	4	x	1	10	x				4	22	x
Record Keeping and Reporting	4	104	x	2	10	x				1	1	x
Restricted Access	1	1	x				2	31	x			
Safety-NMFS	2	2	x	1	1	x	1	3	x	1	1	x
Seabird-Avoidance Measures	1	16	x							1	20	x
<b>OLE-Fix It Completed</b>										<b>2</b>	<b>3</b>	<b>1</b>
Catcher Processor Longline										1	1	x
Prohibited Species - Mishandling										1	2	x
<b>OLE-SS Paid</b>	<b>16</b>	<b>95</b>	<b>7</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>5</b>	<b>1</b>	<b>3</b>	<b>4</b>	<b>2</b>
Catcher Processor Longline	4	63	x									
Failure to Notify	1	1	x									
Inadequate Accomodations	1	3	x									
Prohibited Species - Mishandling	4	11	x	1	1	x	1	5	x			
Reasonable Assistance	2	9	x							1	2	x
Record Keeping and Reporting	1	3	x							1	1	x
Safety-NMFS	3	5	x							1	1	x
<b>OLE-WW Affirmed</b>	<b>4</b>	<b>25</b>	<b>4</b>	<b>10</b>	<b>44</b>	<b>3</b>	<b>4</b>	<b>6</b>	<b>3</b>	<b>12</b>	<b>117</b>	<b>3</b>
Catcher Processor Longline				2	27	x	1	1	x			
Disruptive/Bothersome Behavior - Conflict Resolved				1	3	x				1	15	x
Gulf of Alaska Salmon							1	2	x			
Harassment - Sexual				1	2	x						
Inadequate Accomodations				1	1	x				1	13	x
Interference/Sample Biasing										1	1	x
Intimidation, coercion, hostile work environment	1	1	x	1	3	x						
Intimidation; coercion; hostile work environment							1	1	x	1	4	x
Prohibited Species - Mishandling	1	21	x	1	3	x				1	3	x
Reasonable Assistance	1	2	x	1	2	x	1	2	x	2	6	x
Record Keeping and Reporting				1	2	x				3	40	x
Safety-NMFS	1	1	x	1	1	x				2	35	x
<b>Written Warning Issued</b>							<b>5</b>	<b>52</b>	<b>1</b>			
Catcher Processor Longline							1	3	x			
Failure to Notify							1	4	x			
Interference/Sample Biasing							1	21	x			
Prohibited Species - Mishandling							1	3	x			
Reasonable Assistance							1	21	x			

We see the same overall trend across years regarding statements and actions. Total actions as a proportion of statements by year has remained quite stable. Summary settlements have declined over the years.

**Table 6-11. Totals for all Management Programs (some not tabled due to small size, non-fisheries violations, and Rule of Three)**

Management Program, Action Level (Disposition), and Statement Heading	2019			2020			2021			2022		
	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents	Count of Statement Subject	Sum of Occurrences	Unique Incidents
All Management Programs												
<b>Grand Totals</b>	<b>906</b>	<b>6333</b>	<b>393</b>	<b>572</b>	<b>3148</b>	<b>224</b>	<b>655</b>	<b>4005</b>	<b>228</b>	<b>715</b>	<b>4587</b>	<b>261</b>

North Pacific Observer Program analysts, an OLE Special Agent, and OLE Observer Program Liaison collaborated to publish “Fisheries observers as enforcement assets: 21 years of lessons from the North Pacific.” C.H. Faunce, J. Smith, A. Kingham, D. Jaszka, Fisheries observers as enforcement assets: 21 Years of lessons from the North Pacific, Mar. Policy 158 (2023) 105868, <https://doi.org/10.1016/j.marpol.2023.1058>