



November 16, 2018

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North Pacific Fishery Management Council

RE: Agenda Item D3: Observer coverage on vessels delivering to tenders update

Email: [npfmc.comments@noaa.gov](mailto:npfmc.comments@noaa.gov)

Dear Council Members:

Peter Pan Seafoods owns and operates the King Cove shore-based processing facility in the Western Gulf of Alaska region along with a shore support facility in Sand Point. We are writing to you today regarding Agenda Item D3 Observer Tenders Update scheduled for Council discussion at the December meeting.

Peter Pan Seafoods understands the critical importance of fisheries monitoring and bycatch management in the Gulf of Alaska and we fully respect the role of the Observer Program in the success of the North Pacific fisheries. The purpose of this letter is twofold: 1) to give background as to the essential need for our company and the WGOA pollock trawl catcher fleet to deliver to tenders to prosecute the pollock and Pacific Cod fisheries and 2) to state our support for the actions put forth already by the Council to ensure we get sufficient data from all fleets and in particular to support electronic monitoring (EM) to help in the effort that the Council prioritized for the CG and WG pollock fleet earlier this year.

Relative to this issue, we work with a fleet of eight 58' trawlers with some based out of King Cove and some out of Sand Point. A substantial percentage of our annual purchases are purchased and transported to King Cove for processing via tenders. We use tenders to transport fish to King Cove for several reasons. Often times, the main area of the pollock harvest is in the Shumagin Islands area which can be a nine to twelve hour run by vessel to King Cove. It would not be economically feasible in this competitive, limited access fishery for vessels delivering to Peter Pan to deliver all their catch to the King Cove dock due to lost fishing time and cost of fuel. Safety is also a genuine concern; the run to King Cove can be unsafe at times especially in the winter with a 58' vessel. Peter Pan also purchases trawl pollock and cod in areas west of King Cove including the Sanak Island area and various locations in the Unimak Island area. Aggregating deliveries onto tenders that are capable of handling adverse weather conditions enables vessels delivering to Peter Pan to continue to fish efficiently and safely. In addition, due to Steller sea lion concerns, a large percentage of the annual WGOA pollock TAC is allocated to the C/D seasons. Chinook bycatch mitigation is enhanced by faster pollock removals facilitated by tender availability prior to Chinook encounters increasing later in the fall.

Tenders are positioned as close to the fishing grounds as weather and safe operating conditions will allow. Typical unloading points include Eagle Harbor in the Nagai Island area, Unga Village Harbor, Squaw Harbor, Kelly's Rock area and Sand Point dock in Shumagin Straits. Occasionally tenders are positioned in King Cove Bay to take deliveries at the end of a season to facilitate our fleet to unload and prepare for other fisheries.

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While tendered fish from the GOA comprise a relatively small percentage of the total Gulf trawl CV catch (5% - 8%. Table 2 of the draft 2019 ADP, p. 27) we want to emphasize the importance of this operational necessity for the small trawl fleet that operates in the WGOA. We have purchased pollock from the WGOA trawl fleet utilizing tenders for over twenty years. The need to tender pollock was borne out of necessity for Peter Pan to enable our fleet to participate effectively in the WGOA trawl fishery and have shoreside processing in King Cove. Tendering pollock was not a result of any effort to circumnavigate any 2013 restructured Observer Program rules regarding coverage; Peter Pan's tender operations significantly preceded the restructured Observer Program.

Peter Pan Seafoods has continued to support the actions the Council has taken relative to monitoring and specifically supported both October 2017 Council actions relative to monitoring GOA vessels that deliver to tenders. This includes 1) the analysis to change the definition of a tender trip and/or evaluate observer deployment from tender vessels, and 2) development of electronic monitoring for trawl vessels (tender and non-tender) fishing in the GOA pollock fishery to monitor for full retention and allow for Chinook salmon counts during the offload at the processing plant. We understand the electronic monitoring approach was also recommended by NMFS' Observer Science Committee as an alternative model for monitoring salmon bycatch in the partial observer coverage fleet, and as a result the Council prioritized this evaluation and asked the fishing and processing sectors to work toward pilot testing.

To this end, Peter Pan Seafoods is a member of the NPFMC Electronic Monitoring Committee and has supported the electronic monitoring proposal aligned with the committee's objectives and submitted by Aleutians East Borough to NFWF. We are pleased to learn that in mid-November NFWF awarded the grant to begin the Western Gulf pilot project in 2019. We see the value to all stakeholders to explore the practical use of EM equipment on board catcher vessels and tenders. We are committed to work with tender vessels that we contract with to participate in EM trial implementation in the WGOA. Successful implementation of EM aboard tenders combined with an observed in plant census count apportioned to those deliveries to tenders would be a realistic and improved approach to ensure sufficient data for bycatch management.

Sincerely,



Dale Schwarzmiller  
Vice President, Alaska Production  
Peter Pan Seafoods, Inc.

Cc: Mike Simpson, Director, Alaska Production, Peter Pan Seafoods  
Glenn Guffey, Peter Pan Seafoods  
Nicole Kimball, Pacific Seafood Processors Association.