FISHING VESSEL OWNERS' ASSOCIATION
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SINCE 1914

May 19, 2016

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

RE: **C-1 Observer Program**

Dear Chairman Hull:

The members of the Fishing Vessel Owners' Association (FVOA) remain concerned about the observed tender trips versus unobserved tender trips. We were encouraged that the most recent **North Pacific Groundfish and Halibut Observer Program 2015 Annual Report** included more focus on this issue. Specifically, the new report renewed analysis of the distribution of trip duration for vessels in the partial coverage category by stratum, gear, and observation status. This was not part of the 2014 Annual Report, however, was reported on in the 2013 Annual Report. The members would like to thank the Council staff for their efforts to have this information included for the 2015 review.

The graphic distribution of trip duration by stratum, gear and observation is found in Figure 3-10, Page 71 (attached). Of particular concern, the 2015 Annual Report states the following regarding the review of the tendering issue:

(1) "Observed trips … that delivered to tenders landed catch with 24.7% fewer species than unobserved trips that delivered to tenders."…page 46. This observation suggests that on observed trips, the vessel operators are avoiding certain bycatch and fishing cleaner than when not observed.

(2) "We also note that the magnitude of the difference in landed catch (101% less on observed trips) was large and therefore … such a difference should not be ignored." …page 46

(3) "Observed trips … that delivered to tenders lasted 50.8% shorter than unobserved trips that delivered to tenders. We also note that the magnitude of the difference in landed catch (33% less on observed trips) was large and therefore…. Such a difference should not be ignored."…page 46

(4) "One of the first analysis presented in the 2013 Annual Report was a comparison of trip duration for combinations of observed and unobserved tendered trips and deliveries (NMFS 2014b). The rationale for this was because of the concern that tendered trips were longer

than non-tendered trips and therefore were being used to avoid observer coverage."…page47

Similar data apparently was available for the 2014 Annual Report, but it was not included in last year's report. The inclusion of the above observation in the 2015 Annual Report is very much appreciated.

It is obvious from figure 3-10 relative to trawl deliveries that some vessels without observers make up to 30-day trips when making deliveries to tenders compared with many trawl vessels fishing 3 or 4 days with an observer. The Observer Scientific Committee (OSC) recommends that tendered trips be evaluated as a separate strata in the future; they also conclude "there is not a way to identify the duration of fishing trips made by catcher boats delivering to tenders without an observer or VMS." The FVOA supports these recommendations and conclusions. The OSC also concludes that there were no major differences between observed and unobserved tender trips based on the fact there were observed trips (however, few) in those long duration tender trips. FVOA members do not agree with this conclusion based on Figures 3-10. Figure 3-10 shows for trawl, no observers on any trips for the trawl fleet over 4 days in length. It appears in order to have the conclusion the OSC presents about observers on longer trips, they are including all gears and pointing to observers on pot vessels that stayed on for up to 10 days, which masks what is happening. What the data shows from figure 3-10 is that there is not much of an observer effect for fixed gear but definitely one for trawl when delivering to tenders.

FVOA would note that it is not clear if the above conclusions relative to tender deliveries by the authors of the 2015 Annual Report are an aggregate of all vessel types making deliveries to tenders or not. The answer to this should be stated clearly. FVOA supports breaking out tendered deliveries as a separate stratum and pursuing appropriate coverage rates for 2017 in order to offset the obvious "observer effect" by gear type if needed. Last year the Council received a NMFS report suggesting there was nothing in the report that suggested an "observer effect" on tenders. It is clear that that statement was only accurate because the data was not included in the 2014 Annual Report. In closing, we appreciate the Council staff's work in helping add the data relative to the tendering issue to the 2015 report.

Sincerely,

Robert D. Alverson
Manager

RDA:cb

Enclosure

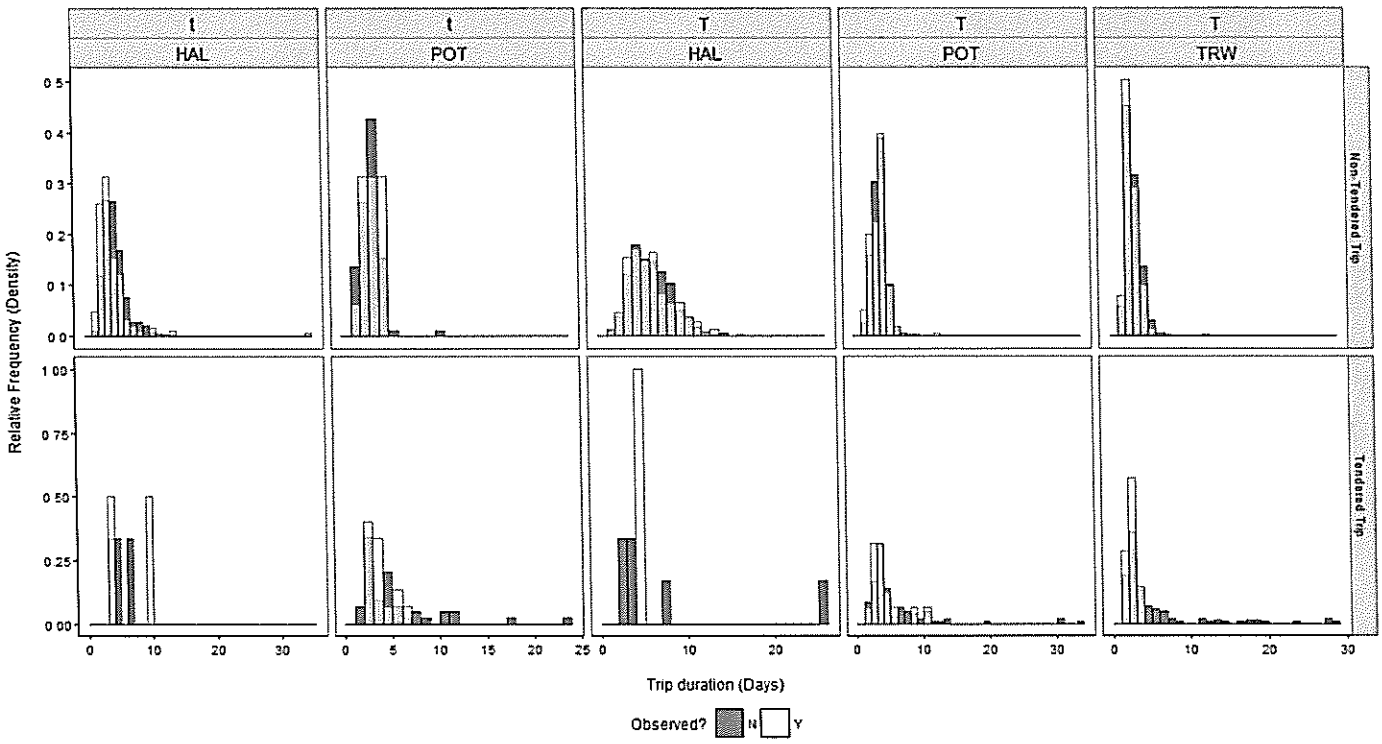

Figure 3-10. Distribution of trip duration for vessels in the partial coverage category by stratum, gear, and observation status. Observed trips are depicted as translucent white bars overtop of solid black bars for unobserved trips. Trip durations where both observed and unobserved status exist are depicted as gray (This is not the same as 'stacked bars', in which the height of the bar would reflect observed and unobserved on top of one another- this plot is has each observation status in front of the other).

To: Mr. Dan Hull, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue Suite 306
Anchorage, AK 99510
May 31, 2015
Re: Agenda Item C5 GOA Trawl Bycatch Management

Dear Council Members,

For the past four years industry has worked to develop an electronic monitoring (EM) possibility for Alaska's pot cod fishery. Vessels from various geographic areas and represented by different industry groups have donated their time, thought, and boats to this effort which has been coordinated by the North Pacific Fisheries Association (NPFA) and Saltwater Inc., and funded by the National Fish and Wildlife Foundation. This work has resulted in the collection of high quality data that demonstrates the pot cod fishery is well-suited to electronic monitoring, and enabled the Council's EM Work Group and the Council to recommend pot cod for Pre-Implementation in 2017.

NPFA and Saltwater Inc. are now writing a proposal to the National Fish and Wildlife Foundation seeking funding for the Pre-Implementation of EM in the pot cod fishery. We strongly support that proposal and urge the Council to support it also. Due to their experience and industry support, NPFA and Saltwater Inc. are uniquely qualified to do the work necessary to move the pot cod fishery toward Full Implementation of EM.

It makes sense to coordinate NMFS funding for pot cod with this NFWF proposal to provide one cohesive Pre Implementation program. This will require contracting changes by NMFS/PSMFC to allow a second EM service provider in Alaska. We support that idea. We believe that having more than one EM service provider will create the opportunity to test different approaches and strategies while further building the infrastructure for Full EM Implementation in Alaska.

Thank you for your consideration.

David Polushkin, K Bay Fisheries Association, EM Workgroup Member

Jeff Stephan, United Fishermen's Marketing Association, EM Workgroup Member

Bernie Burkholder, F/V Northern Endurance, EM Workgroup Member

Jerry Bongan, F/V Jeanoah, Project Participant

Frank Miles, F/V Sumner Strait, Project Participant

Beth Stuart, Peninsula Fishermen's Coalition

North Pacific Fisheries Association
P.O. Box 796 · Homer, AK · 99603

To: Mr. Dan Hull, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue Suite 306
Anchorage, AK 99510
May 31, 2015
Re: Agenda Item C1 Observer Program

For the past four years the North Pacific Fisheries Association (NPFA) and Saltwater Inc. have worked with members of the pot cod fleet, the EM Work Group, and others to develop an EM program for Alaska's pot cod fishery. The work was funded through industry contributions and the National Fish and Wildlife Foundation, and was conducted in two phases:

Phase I

NPFA and Saltwater pioneered the use of electronic monitoring (EM) in Alaska's pot cod fishery collecting high quality digital imagery and sensor data on 13,098 pot hauls and providing a record of fishing effort and catch assessment.

- Saltwater data reviewers were able to identify 99.6% of the 55,212 catch items to a species or species group level.
- The project team developed multiple data collection forms and review protocols that were reviewed by NMFS and the EMWG, and have proven valuable to broader EM program implementations.

Phase 2

- Onboard EM systems collected high quality video imagery and sensor data of an additional 13,000+ pot hauls and provided data on fishing effort and discards.
- The project team worked closely with industry to identify handling procedures that would minimize disruption to normal fishing practices yet allow for the recording of images of bycatch.
- Industry volunteers tested three distinct methods of obtaining discard weights
- Saltwater data reviewers are assessing this data now, using open source software tailored to the pot cod fishery.

The Council's February motion to include pot cod in the Pre-Implementation Plan for 2017 is an affirmation of the work that has been done to date.

NPFA and Saltwater are now writing a proposal to the National Fish and Wildlife Foundation seeking funding for the Pre-Implementation of EM in the pot cod fishery. We strongly back that proposal and urge your support as well.

NPFA and Saltwater have demonstrated the viability of EM as a monitoring tool for the pot fleet, and are uniquely qualified to do the work necessary to move the pot cod fishery to Full Implementation. Their experience with EM in the pot fishery, strong ties and support from industry, work with pot cod data, and established infrastructure in Alaska will be essential assets for successful Pre-Implementation.

One of the goals of Pre-Implementation has been to build the ongoing infrastructure for EM in Alaska. We believe that goal will be served by having more than one EM service provider. This idea has been supported by the EMWG, but the administrative and contracting limitations of NMFS and PSMFC have, for the past two years, left us with only one service provider. We believe a second EM service provider offers the opportunity to test different strategies and ways of doing business. Saltwater has demonstrated this reality with its work developing open-source EM software and building data review capacity in Alaska. The proposal being prepared by NPFA and Saltwater for NFWF would ensure an active role of a second EM service provider in Alaska, and we believe this deserves Council support. We would request the council provide a letter to include in our proposal to NFWF.

Thank you for your consideration,

Malcolm Milne
President, North Pacific Fisheries Association