

May 22, 2017

Mr. Bill Tweit, Chair
Observer Advisory Committee
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 Tweit, Dr. Balsiger, and Observer Advisory Committee Members,

Thank you for considering options for increasing observer coverage in the federal groundfish fisheries. We urge the Observer Advisory Committee (OAC) to recommend creating a full observer coverage category for vessels using trawl gear in the Gulf of Alaska and Bering Sea/Aleutian Islands. We further urge the OAC to present this option to the North Pacific Fishery Management Council (NPFMC) for consideration at its June 2017 meeting. There is urgency to these changes because they must be considered 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 ensure compliance with applicable laws and treaties. NMFS determines the deployment rate of observers using available sea-day budgets with the goal of obtaining a representative sample of the groundfish catch.¹ Additionally, observer coverage rates can be tailored to best collect information for management and conservation priorities.

At this meeting, the OAC will review the performance of the 2016 Observer Program in order to make recommendations to the NPFMC for needed changes. It is not clear, however, how that task will be undertaken because the 2016 Annual Report does not provide sufficient information about the effects of the observer coverage rates on the estimates of bycatch and discards. The relationship between observer coverage rates and variability in catch estimates is not reported. We ask the OAC and 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. The observer coverage in the Gulf of Alaska trawl fleet, for example, dropped from 28% in 2016 to an estimated 18% in 2017. This fleet is still in the midst of controversial Chinook salmon and Pacific halibut bycatch management; as such 2017 is an inopportune time to leave observers off their boats. Underestimates of salmon or halibut bycatch impact

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.

corresponding stocks and associated fisheries, while overestimates affect the groundfish fleet by shutting it down. The reasonable solution is more observer coverage to have better information.

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.² 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 Chinook salmon and Pacific halibut, may not even be detected by the observer.³

Full observer coverage would also greatly decrease the “observer effect” on the data. The “observer effect” can skew bycatch data in two ways: fishermen may under-report bycatch on unobserved hauls⁴ or fishermen may change their fishing behavior during sampled versus unsampled trips.⁵ Changes in behavior could include shorter trips with the observer or fishing with less effort in order to comply with percent coverage needed while minimizing the amount of bycatch an observer can record. This “observer effect” has been documented in the Alaska groundfish fisheries.⁵

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 ADP; and even the playing field for all trawl vessels. In 2016, 56 bottom-trawlers in the Gulf of Alaska and 24 bottom trawlers in the Bering Sea/Aleutian Islands were partially observed.⁶ Some of those vessels may have fished in both regions. Keeping a particular vessel in the full observer category throughout its yearly fishing calendar simplifies management and enforcement. Partial coverage by its very nature is inefficient on a cost per unit basis compared to full coverage.⁷ The Alaska Groundfish Data Bank has acknowledged that the trawl fleet includes members currently gaming the system to benefit themselves financially at the detriment of the other players.⁸ Full observer coverage would create more equity and fairness among the fleet.

² 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.

³ 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.

⁴ 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.

⁵ 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.

⁶ 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.

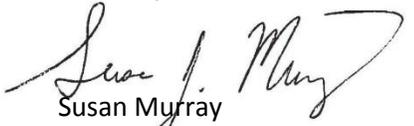
⁷ Alaska Fisheries Science Center and Alaska Regional Office. 2017. North Pacific Observer Program 2016 Annual Report. AFSC Processed Rep. 2017-07, 143 p. Alaska Fish. Sci. Cent., NOAA, Natl. Mar. Fish. Serv., 7600 Sand Point Way NE, Seattle WA 98115.

⁸ NPFMC. 2016. Gulf of Alaska Trawl Bycatch Management Preliminary Economic Analysis. Pg. 225

Changes to the Observer Program must be made to reflect the conservation and management priorities of Chinook salmon and Pacific halibut bycatch management and the need to improve bycatch estimates of the high discard bottom-trawl fisheries. The trawl fleet needs full observer coverage and should be added to the full observer coverage categories defined in regulation.⁹

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
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⁹ 50 CFR § 679.51(a)(1) and (2)