



Alaska Whitefish Trawlers Association

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Alaska Board of Fisheries
Chignik Finfish meeting
December 5-6

Proposal 45 - Oppose

The Alaska Whitefish Trawlers Association (AWTA) is located in Kodiak and represents the majority of independently owned trawl vessels that harvest groundfish in the Central Gulf of Alaska (CGOA). Our vessels also harvest groundfish in the Western Gulf of Alaska and Bering Sea.

AWTA opposes proposal 45 which would require 100% observer coverage for trawl vessels targeting groundfish inside state waters.

The trawl fleet in the Gulf of Alaska has been required to carry observers for many years under the original observer program, was required to carry an observer 30% of the time and it was the responsibility of the vessel to make sure that they had enough observed trips. On January 1, 2013 a new Restructured Observer program became effective. Under this new program trawl vessels are a part of the trip selection pool which means that for every trip, a vessel has to register with the observer program and find out if they are required to carry an observer. It is no longer the responsibility of the vessel to determine whether they will carry an observer. It is believed that shifting the decision to carry an observer from the vessel to NMFS results in better data.

This program was developed over several years and is a complex and sophisticated program designed to meet data collection goals and objectives. Information regarding the volume, size, sex and stomach contents for target species and the amount and type of bycatch is recorded. Genetic data is also being collected from bycaught Chinook salmon to determine their river of origin. Once this data is collected it is used to give regulators better insight into the removals of both target and non-target species by the trawl fleet.

It is unclear what would be done with any data that would be collected by the state observer program and how it could be used for scientific insight and management decisions. Discussion between the federal observer program and the state would need to be undertaken so the assimilation of state-derived data could somehow be incorporated into the larger data base and provide useful output. One thing that is very clear is that the collection of data just for the sake of collecting data is a futile undertaking and it would be very important to understand how any additional data could be used

The requirement for 100% observer coverage inside state waters would entail the development of a similar complex program which will be an expensive and time consuming process.

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The cost of developing, implementing and managing a new observer program will be very high and will be a substantial investment of state money and personnel. The cost of the program will also be high for the trawl fleet with observer costs approaching \$600-\$800/day. The vessels will not only incur the daily costs but they are also responsible for many additional costs for debriefing days and transporting of observers.

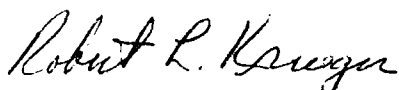
The trawl fleet continues to race for fish in the Gulf of Alaska. The fast paced derby-style fisheries compromise the ability to effectively manage bycatch and the North Pacific Fisheries Management Council has recognized the need to make changes in the way trawl fisheries are managed. The NPFMC has already begun the process of developing a new management structure and one of the components of the new program will be 100% observer coverage.

The interaction between trawl activity that occurs in federal waters and state waters is an integral part of the new management program and will require collaboration between the NMFS and State to insure that common goals and objectives are developed.

AWTA asks that the Board of Fish focus their attention on the development of the new management structure for trawl fisheries in the GOA and not spend their time, energy, staff and money to develop a separate observer program. The joint protocol process should be used to discuss the common goals and objectives of both NMFS and the state before any new observer program is considered.

AWTA requests the Board reject Proposal 45.

Sincerely,



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