

**ATA Testimony**  
**NPFMC Observer Advisory Committee**  
**June 3, 2013**

**RE: Electronic Monitoring/Observer Program**

My name is Dale Kelley. I am the executive director of the Alaska Trollers Association. ATA represents hook and line fishermen who operate in state and federal waters. While we are a salmon organization, ATA represents some of the largest and smallest IFQ holders in Southeast; this diversification is critical to the success of their salmon businesses.

I have not had time to fully review the electronic monitoring documents, so may have additional comments as the meeting progresses this week. For now, I'll make just a few observations.

I wish to note for the record that ATA does not support the observer program for vessels under 60', as it is impractical and most data could be collected through other means. This is particularly true given the small component of the halibut harvest that is taken by this fleet. In our region, 1,300 quota holders catch about 12% of the quota.

I appreciated committee member Falvey's comments on the potential for using tonnage as a metric for determining who must carry an observer. It makes sense given the number of vessels (nearly 60%) who were able to get exemptions, since many of the individuals with vessels under 60' quite likely have relatively small amounts of the annual quota. Given NOAA's limited budget it would seem more valuable to focus observer coverage on the over 60' fleet, which typically harvests more significant amounts of halibut.

If NMFS chooses to continue observing the under 60' fleet, ATA supports electronic monitoring as an alternative to observers. Even our larger vessels have trouble finding bunk space for an extra person. Bunk space is precious on a small boat, even if not used for a person. The boat I fish on is among the larger boats, but the skipper has limited quota share and often alternates trolling with short longline trips. His 'extra' bunk houses troll gear. It just doesn't make sense to disrupt small operations by requiring them to totally upend their boat to make room for a short-term observer. Allowing the option to use electronic monitoring will help alleviate that burden.

ATA opposes mandatory vessel or equipment modifications to implement this program. I have heard from fishermen who were told by NOAA staff that they would have to build a bunk or make other changes, so was relieved to hear NOAA staff state today that is not true. Please keep it that way! The high cost of life rafts was noted by NOAA staff today, but the purchase price is not where it ends. There will be the space required to house a bigger raft, which could be problematic on a smaller vessel. There is also the increased cost burden associated with re-packing and shipping the raft each year. Many vessel owners will need additional insurance to take an additional person onboard and there is very likely be an array of hidden costs that have yet to be defined. All this will be on top of the \$1,000 administrative fee each vessel owner will be assessed for the observer program.

Finally, as you move to electronic monitoring, please consider an adequate phase-in period. You might recall that availability and quality control were significant issues when EPIRBs were first required. When designing the requirements you must bear in mind the practicalities for fishermen, who will be stuck with both the initial cost and ongoing maintenance. When electronics break down it is difficult to get repairs done quickly in Southeast. Hopefully you will find a way to avoid penalizing fishermen for that.

Thanks for the chance to call in today. I look forward to discussing these issues more fully with the committee and staff during the meeting and beyond.