

January 25, 2002

Dr. Jim Balsiger
Regional Administrator
NMFS Alaska Region
P.O. Box 21668
Juneau, AK 99802-1668



P.O. Box 30167
Seattle, WA 98103

Dear Dr. Balsiger-

On behalf of the Association for Professional Observers, I would like to congratulate the Alaska Region and the North Pacific Groundfish Observer Program (NPGOP) for the time and effort that went into the latest draft of the NPGOP's Mission/Goal/Objectives/Activities statement, presented to the Observer Advisory Committee (OAC) on January 7-8, 2002. Overall we approve of the current draft. However, there are a few changes that we think should be incorporated into the final version. They are outlined as follows:

Objective 2, which is to "Provide information to monitor and promote compliance with NOAA regulations and other applicable programs" includes the following activity definition: "Work with enforcement personnel to monitor **and enforce** regulations". The use of the word "enforce" implies that observers have enforcement authority, when in reality they do not. We recommend that the language be changed to "Work with enforcement personnel by monitoring compliance with NOAA regulations".

The APO approves of the addition of an activity under Objective 2, providing for maintaining effective communication between government and industry regarding compliance issues. We also support the OAC suggestion of a new objective, to "Create an observer program that fosters professionalism and safety among observers". In keeping with these two concepts, we feel it is imperative that the agency support and intervene on the behalf of observers who report safety and compliance concerns. These concerns should be communicated to vessel owners and captains immediately, and in such a way that enforcement action need not inevitably follow but would result when necessary. In the past few years the agency has done an admirable job of improving its handling of these issues, but more could be done. An increase of general outreach to industry would greatly assist observers and, ultimately, industry and the agency, enabling quality data to be collected without needless risk to observers.

Finally, the APO strongly approves of the Committee's recommendation to add, under Objective 4, an activity stating that the NPGOP will perform an annual review of its progress in accomplishing its stated goals and objectives.

Thank you again for proceeding with the goals and objectives. We would like to see them to become official policy for the NPGOP as soon as possible.

Sincerely,

Irene Dorang
Executive Director

Cc: Dan Ito, Program Leader, Groundfish Observer Program
Doug DeMaster, Science and Research Director