



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
Alaska Fisheries Science Center
Fisheries Monitoring and Analysis Division
7600 Sand Point Way N.E.
Seattle, WA 98115-6349

February 3, 2015

To: All North Pacific Groundfish Observer Providers

From: Chris Rilling, Acting Director
Fisheries Monitoring and Analysis Division

Subject: Lead Level 2 Certification Policy

Effective mid-February 2015, FMA will institute a policy within the context of current regulations to credit observers for experience needed to achieve Lead Level 2 (LL2) certification on fixed gear vessels. The NMFS goal with the LL2 regulatory requirements is to ensure that observers deployed to LL2 assignments have the skills and abilities necessary to complete this job successfully which results in the collection of quality data.

Currently, an observer will achieve LL2 status by meeting these requirements as stipulated in the regulations (50 CFR §679.53):

- Successfully complete 60 days of observer data collection,
- Receive an evaluation by NMFS for the most recent deployment that indicates the observer's performance met Observer Program expectation standards for that deployment,
- Successfully complete 2 cruises of at least 10 days each, and
- Sample at least 30 sets of fixed gear.

Within the FMA policy, credit will be given for a sampled set if at least one sample on a haul is completed, *and* the LL2 trainee has completed the other responsibilities associated with the experience as outlined below:

- Provider must identify individuals intended to deploy as LL2 trainees before completion of any briefing or training; FMA must be notified prior to deployment to vessel,
- LL2 trainee must complete additional training as directed by FMA, in conjunction with the one-day or four-day briefing prior to deployment as a LL2 trainee,
- Successfully complete trip and haul level duties as defined in training (such as, but not limited to; designing sample frames, verifying total gear on vessel, completing hook counts, successfully managing the overall work load, and documenting their work in their log-book),
- The LL2 trainee will be responsible for all data collected during a deployment as a LL2 trainee, which will be presented in debriefing,

- LL2 trainee must successfully complete a midcruise prior to their first trip as the sole observer if LL2 status will be awarded during deployment,
- Attend a pre-cruise meeting with FMA staff prior to the first deployment as the sole LL2 observer, and
- To the extent possible, re-deploy new LL2 observers onto the same vessel that they achieved their needed experience on.

This policy will achieve the goal of ensuring that observers on LL2 assignments are fully prepared for the responsibilities required to collect quality data, while minimizing the cost and workload associated with achieving the requisite experience. The FMA Division plans to monitor how well this approach is working, and we reserve the right to modify the policy if this approach does not provide quality data.

Thank you for your support in this matter. Our experience is that the vast majority of the observers who work in Alaska do an excellent job, and our efforts are geared to helping them be prepared so they can be successful in the challenging longline sampling environment.

If you have any questions regarding, please contact myself at (206) 526-4194 or Gwynne Schnaittacher at (206) 526-4674.

CC: Elizabeth Chilton
Brian Mason
Gwynne Schnaittacher
Lisa Thompson



12 March 2015

Chris Rilling, Acting Director
Fishing Monitoring and Analysis Division
7600 Sand Point Way NE
Seattle, WA 98115-6349

Dear Chris,

In 2014 the Observer Providers and Freezer Longline Coalition (FLC) brought to Martin Loefflad's attention the following problem: when two observers sampled onboard a vessel that set a single set in a 24 hour period, only one observer was getting credit. Martin agreed to find a way to credit both observers for their sampling effort when both observers, placed voluntarily on Freezer Longliners, sampled a single set. We now see that NMFS responded, to what seemed to be a simple request, with a new multi-step process that creates a potentially restrictive path for any observer placed voluntarily on the fixed gear fleet to gain LL2 status.

Placing second observers onboard Freezer Longliners is something that the Providers and the program have past experience with. In fact, for years, and with much success, we put second observers onboard these same fixed gear vessels when they fished CDQ. We operated under the same guidelines that we followed (and continue to follow) with the Amendment 80, AFA fleet, and FLC vessels that are required to carry second observers. That is, we placed any observer as a second observer without extra training, and when an observer met the requirements stipulated in the regulations (50 CFR 679.53), they could become a lead in the field..

Going forward, freezer longliners will be treated differently than the rest of the fleet. Your new policy asks the Providers to identify which observers we might want to place as second observers on freezer longliners before those people complete a briefing or training. We will want all our observers to receive this training, because we need every observer who works for us to be prepared to take whatever assignment comes their way during any given deployment. Identifying which observers in a given group will work on longliners over the ensuing three months isn't always possible, because too often events will conspire to unmake our plans. We applaud your decision to improve training for observers working on longliners, but we encourage you to work these improvements into all observer trainings and briefings by May 1, 2015.

Also unique to the freezer longline fleet are the mid-cruise and pre-cruise requirements included in your policy. Because they require NMFS staff to be available to carry them out, the mid-cruises and pre-cruises have the potential to complicate efforts by providers to maintain a corps of LL2's. Since affected vessels face potential delays if a NMFS staff person isn't available in the evening, on a holiday, or on a weekend, or if there is a period of time during which no staff person is assigned to Dutch Harbor, skippers will at times face a decision: wait in town until they can take a voluntary 2nd observer on board,

or depart for the grounds with a single observer. To the extent that skippers make the latter choice, some observers will see their employments interrupted and their path to LL2 status impeded.

We originally questioned the way NMFS awarded sampling credit on freezer longliners because at the time observers trying to qualify as LL2's faced unreasonable barriers. The list of training, briefing, mid-cruise and pre-cruise requirements NMFS has put in place risks creating a different situation with the same result: second observers on freezer longliners seeking to qualify as LL2's could continue to face delays with no parallel on other gear types.

We appreciate your willingness to work with us to create a framework that credits observers for the work they've done and allows providers to build and maintain a corps of certified LL2's for the Freezer Longline fleet, but we're not sure if we're there yet. In particular, any long term solution should 1) allow any certified observer to be placed as a second observer with an LL2 lead on a Freezer Longliner, and 2) should give providers the flexibility to assign second observers on short notice, even late at night, on weekends, and on holidays.

Thank you for your attention to this matter; I look forward to your reply.

Sincerely,



Michael Lake
President

Cc: Craig Cross
Chris Oliver
Chad See
Rob Wurm