

September 14, 2015

Commandant
US Coast Guard
2703 Martin Luther King Jr. Ave. SE
Washington, DC 20593-7501

Dear Admiral Zukunft,

The following North Pacific fishing associations, fishing companies and safety organizations request that you reconsider your letter (COMDT (G-CVC-3) 16701) of August 18, 2015 where it appears that existing Coast Guard policy on the fishing vessel safety exam decal cycle was changed from the current two-year period to a five-year period. This change overturns a highly successful 20-year-old policy that has become fully integrated into fishing company business models, insurance broker and insurance pools risk assessments/policies, and the National Marine Fisheries Service (NMFS) and State of Alaska fishery observer program regulatory framework. We are concerned that the new policy could reverse a multi-decade trend in safety improvements. We request that Coast Guard vessel compliance and fishing vessel safety program managers meet with representatives of the North Pacific fishing industry to discuss the impacts of this policy change on our fleets and develop a way forward that best promotes our shared fishing vessel safety objectives.

Even before passage of the Commercial Fishing Industry Vessel Safety Act of 1988, the North Pacific fishing industry was a steadfast supporter and partner in developing U.S. Coast Guard fishing vessel safety requirements. This partnership between the Coast Guard and the North Pacific fishing industry has continued since the mid-1980's, resulting in thoughtful, effective safety programs and safety training which have saved hundreds of fishermen's lives.

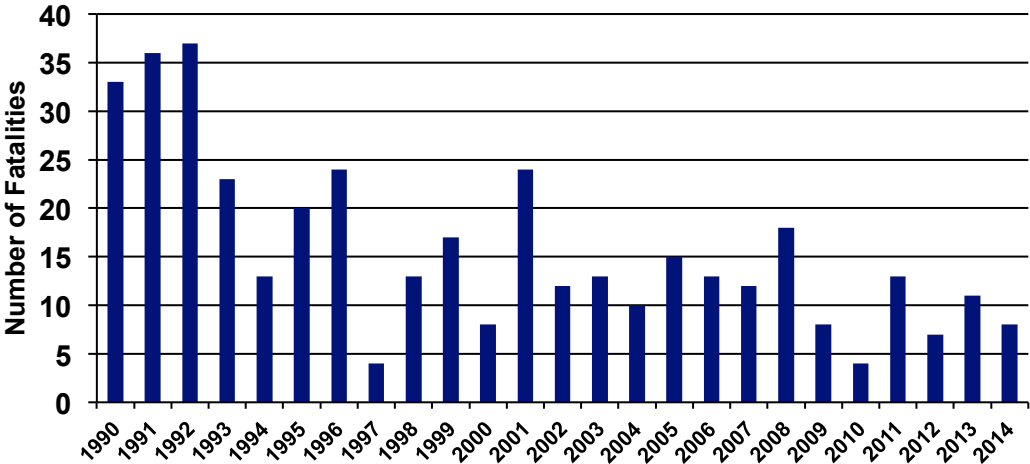


Figure (1) Fatalities in Alaska's Commercial Fishing Industry 1990-2014. (Source) NIOSH

Since the development of that landmark legislation and its implementing regulations in the early 1990's, fatalities in Alaska have dropped by over 74%. This success in reducing in fatalities has been unequalled anywhere in the United States.

There are a variety of factors behind this dramatic reduction of fatalities: vessel owners and fishermen embracing safety culture, development of specific safety programs and interventions directed at high-risk fisheries, the rationalization of major fisheries in the Bering Sea, Aleutian Islands and Gulf of Alaska, and the availability of a robust network of vessel safety training organizations such as the North Pacific Fishing Vessel Owners Association and the Alaska Marine Safety Education Association. While these factors have all had major impacts, arguably one of the most important reasons for the decline of fatalities has been the Coast Guard's presence in conducting dockside exams and its adaptation of a two-year cycle for exam decals. It is this regular, one-on-one interaction with fishermen that is saving lives.

A two-year exam cycle (adopted by the Coast Guard in the early 1990's) created a frequent opportunity for the Coast Guard and fishermen to develop familiarity with each other and to increase each other's knowledge of vessel safety and fishing operations, as well as ensuring that the vessel was safe to sail. This two-year interval has been fully embraced by the fishing industry and is of significant importance to vessel insurance policies / risk assessment as well as the State of Alaska and NMFS observer programs. With particular regards to the NMFS observer program, fishery observers have been a critical element in ensuring safety on fishing vessels. Observers are required to spot check primary lifesaving equipment prior to the vessel sailing. As virtually all safety equipment (life rafts, hydrostatic releases, EPIRB batteries, flares, fire extinguishers, etc.) will expire between exams on a five-year exam cycle, this will create additional pressures for observers to become the de facto safety compliance official as the Coast Guard reduces their own interactions with the fleet.

Despite best intentions, incremental decreases in the safety of a vessel can occur. Whether it is a leaking shaft seal, a malfunctioning high water alarm, a frozen dog, the improper installation of a life raft, or a slight tear in an immersion suit, these individual items added together can result in catastrophic vessel loss with fatalities. The key of the Coast Guard's dockside exam program was to have sufficient presence and expertise to detect these individual problems before they contributed to a larger problem. Cutting the frequency of dockside exams in half is a drastic relaxation of safety standards that will needlessly reduce safety of vessel and crew and could increase fatalities in the commercial fishing industry. It is our understanding that the language of 46 USC 4502 (f)(2) allows for the Coast Guard to examine a fishing industry vessel "at least once every five years" and that continuing a two-year decal exam cycle is consistent with that legislation.

There is a 30-year history of the Coast Guard and fishermen collaborating in the North Pacific fisheries to make this industry safer. The vibrant safety programs we

enjoy today were built upon the losses of loved husbands and wives, fathers and mothers, sons and daughters. It would be ironic and tragic if the policies that achieved these hard fought gains were to be discontinued by the very agency tasked with promoting fishing vessel safety. In considering our request, we hope that you recognized the concerns expressed in this letter represent a broad and diverse collection of safety organizations, fishing vessel owners, gear types and fisheries who in turn support over 10,000 fishermen. Thank you and we look forward to the opportunity to discuss this matter in greater detail.

Sincerely,

Mark Gleason

Alaska Bering Sea Crabbers

Jerry Dzugan

Alaska Marine Safety Education Association

Stephanie Madsen

At-Sea Processors Association

Bob Alverson

Fishing Vessel Owners Association

Chris Woodley

Groundfish Forum

Karen Conrad

North Pacific Fishing Vessel Owners Association

Bob Kehoe

Purse Seine Vessel Owners Association

Joe Plesha

Trident Seafoods

Brent Paine

United Catcher Boats

Chad See

Freezer Longline Coalition

Inge Andreassen

American Seafoods Company

Lisa Terry

Alaska Independent Tendermen's Association

Julie Bonney

Alaska Groundfish Data Bank

Bob Krueger

Alaska Whitefish Trawlers Association

David Harsila

Alaska Independent Fishermen's
Marketing Association

Summary of Associations and Companies

Association / Company	Number of Vessels	Avg Crew Size	Gear	Region and Fishery
Alaska Bering Sea Crabbers	75 catcher vessels	5 - 6	Pot	BSAI /GOA - crab and cod
United Catcher Boats	72 catcher vessels	5	Mid Water Trawl	BSAI/GOA - pollock, cod, & flatfish WA / OR - Pacific Whiting
Freezer Longline Coalition	30 catcher processors	22	Longline	BSAI / GOA - cod, blackcod, turbot
Groundfish Forum	18 catcher processors	35	Trawl	BSAI / GOA - Flatfish, Atka mackerel, rockfish, Cod
Fishing Vessel Owners Association	95 catcher vessels	3 - 6	Longline	BSAI / GOA – halibut, blackcod
Purse Seine Vessel Owners Association	290 catcher vessels	3 - 5	Purse Seine	BSAI / GOA/ SE Alaska - salmon, halibut, herring WA / OR – Coastal pelagics, Dungeness crab
American Seafoods Company	5 catcher processors	135	Mid Water Trawl	BSAI – pollock, cod, flatfish WA / OR – Pacific Whiting
At Sea Processors Association	16 catcher processors	135	Mid Water Trawl	BSAI – pollock, cod, flatfish WA / OR – Pacific Whiting
Trident Seafoods	43 + catcher vessels, tenders, catcher processors, floating processors	Varies	Mid Water Trawl & Pot	BSAI / GOA – salmon, cod, pollock, blackcod, IFQ sablefish WA / OR – Pacific whiting
Alaska Whitefish Trawlers Association	22 catcher vessels	3 - 4	Trawl & Longline	BSAI / GOA – pollock, cod, flatfish WA / OR – Misc Groundfish
Alaska Groundfish Data Bank	38 catcher vessels	3 - 4	Trawl, Longline & Pot	BSAI / GOA – pollock, cod, flatfish, IFQ halibut / sablefish, rockfish WA / OR – Pacific Whiting
Alaska Independent Tendermans Association	95 tender vessels	3-4	Tender	Bristol Bay, Kodiak, Prince William Sound, SE Alaska, Puget Sound
Alaska Independent Fishermen’s Marketing Association	300 catcher vessels	2-3	Gillnet	Bristol Bay Salmon