



UNITED FISHERMEN OF ALASKA

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Submitted Electronically To:

House Special Committee on Fisheries: House.Fisheries@akleg.gov

RE: HB 294 – Electronic Monitoring of Fishing Vessels

Dear Committee,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 36 commercial fishing organizations participating in fisheries throughout the state and the federal fisheries off Alaska's coast. UFA **opposes HB 294** as it is currently written.

HB 294 seeks to amend Alaska Statute to allow the Commissioner of Fish and Game to implement an electronic monitoring (EM) program after authorization is issued by the Alaska Board of Fisheries. Although the proposed bill does not speak to a specific electronic monitoring program, it opens the door for a future program which would significantly impact not only harvesters and industry, but also fishery management and the State of Alaska. The bill would allow EM as an alternative or additional option to the traditional onboard observers. As currently written, both AS 16.05.050(a) and AS 16.05.251(a) require the board to make a written determination that a specific list of criteria had been met prior to implementing an on-board observer program. The criteria are in place to ensure that careful consideration is made in determining the necessity of a program, its feasibility, and the impact to a fishery. The current language in the proposed bill adds EM as an alternative option but fails to include EM as being subject to these criteria prior to the implementation of a program. UFA would like to receive clarification as to why an EM program would not be subject to the same list of criteria as a traditional observer program.

EM has the potential to be a very useful tool if a program is developed with a clear and specific objective, done in consultation with industry, and done with thoughtful research and consideration. Industry is not opposed to EM, but there are many questions and concerns to be addressed, starting with who is going to bear the burden of the cost associated with developing and implementing an EM program? In the development of EM programs for several fisheries in Alaska, we know that successful EM programs generally take several years or longer to develop. Materials, adapting equipment for functional use on vessels, fixing equipment that breaks, storing data and reviewing data all come at a cost. With the seafood market conditions being

what they are at present, saddling fishermen with additional costs without clear objectives, could prove to be cost prohibitive for many fishery participants.

Further questions that have been discussed revolve around the objective of EM programs and logistical issues. Is the objective of the program to add enforcement to certain fisheries? If so, we already have a tool in place, housed with the Alaska State Troopers and perhaps an increase to their budget for enforcement would be more cost effective than starting up an EM program for an entire fishery. What is the coverage that the department is looking for? If the program is being used for enforcement, 100% coverage would be necessary and someone (either department or outsourced) would need to review footage for a large number of hours. If the equipment breaks down and there are no technicians available or are backlogged, are fishermen going to be sitting tied to the dock and potentially missing peak fishing times while they wait for a repair? Currently, there are only two EM companies operating in Alaska, one of which is based in Alaska. There would need to be a significant increase in EM resources to be able to operate additional large scale EM programs.

Another concern of commercial fishermen is where will the data be stored, who will have access to the data and how will the data be protected to maintain commercial fishermen's confidentiality?

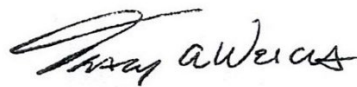
UFA is not against EM programs in concept and several of our groups have worked extensively to help develop programs in the past, but we have concerns with the bill as it is currently written. We will be listening to the hearings and following up with the appropriate parties for clarification and adding additional feedback as needed.

Thank you for the opportunity to provide comments.

Regards,



Matt Alward
President



Tracy Welch
Executive Director

MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Trollers Association
Alaska Whitefish Trawlers Association • Area M Seiners Association • At-sea Processors Association • Bristol Bay Fishermen's Association
Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen
Cook Inlet Aquaculture Association • Cordova District Fishermen United • Douglas Island Pink and Chum • Freezer Longline Coalition •
Fishing Vessel Owners Assn • Groundfish Forum • Kenai Peninsula Fishermen's Association • Kodiak Crab Alliance Cooperative • Kodiak
Regional Aquaculture Association • Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional
Aquaculture Association • Northwest Setnetters Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture
Corporation • Purse Seine Vessel Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance •
Southeast Alaska Fisherman's Alliance • Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners • Southern
Southeast Regional Aquaculture Association • United Catcher Boats • United Southeast Alaska Gillnetters
Valdez Fisheries Development Association