



OREGON TRAWL COMMISSION

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The Honorable Don Young
U.S. House of Representatives
2331 Rayburn House Office Building
Washington D.C. 20515-0201



PERCH

Dear Mr. Young:

Early in March, you wrote to me, as Chairman of the Commercial Fishing Industry Advisory Committee, asking for "an analysis and comments on" the Secretary's plan for licensing operators of federally documented fishing vessels, and the differences in it and our plan. I talked to Rod Moore and asked if it was alright to respond after our Committee meeting in May, he assured me it was. I formed a subcommittee to address this request and to try and get the opinions of all the Committee. While, I cannot say with certainty that all members support all of this in every detail, I believe it is the view of most of the Committee.



FLounder

As you know, the Committee also developed a plan, which agrees in many important respects with the Secretary's but differs in others. We will try to clarify both the similarities and the variations.



COD

The most significant point to be made is that both the Coast Guard and the Committee reject the status quo. At the present, the operator of a documented fishing vessel of less than 200 gross tons is not required to meet any standards. Along with the National Transportation Safety Board and the Marine Board of the National Research Council, we feel that the "human factor" which is involved in the high accident rate in the industry must be improved.



SOLE

The next point of agreement is that the best way to attain a desired level of competency is with relevant and practical hands on training. The Coast Guard plan recognizes training, testing and certification by third parties as the primary method for determining "professional qualifications." This is fully consistent with the Committee's proposal.



SNAPPER

The point of divergence of the Coast Guard's and the Committee's plans really concerns nomenclature: The Coast



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Guard's plan was developed within the context of the existing Coast Guard licensing program; the Committee focused on the specific needs--and sensitivities--of the fishing community. We were urged to think creatively, and to develop a framework within which the necessary training would take place, but without the more cumbersome bureaucratic constraints of a conventional licensing system. We did our best to make our requirements acceptable to those whom they would affect most. In fact, we agree on more vital points than we disagree. Perhaps the diversity stems from our having followed separate paths, although they were often parallel ones.

In answer to your specific question, these are some of the areas where our plans differ:

1) Minimum age requirement: Current Coast Guard licenses cannot be issued to those under 18. Many fishermen, including some on the Committee, skippered their own vessels at 16, and felt that experience was more significant than age in determining ability.

2) "Break point": Determining the size of a vessel has been a problem since long before our Committee was created. The Coast Guard wants to stick with Gross Tonnage; the Committee used the language of the Act, which recognizes 79 feet and more than 16 persons on board as "break points" and which reflects international standards. Any system is fraught with problems; negotiation is possible.

3) Citizenship: A non-issue. The Committee didn't consider it and would not argue against it, in fact most would support it.

4) Many of us on the Committee thought that the institutions that did the training and testing could be empowered to give a "certificate of competency" with a passing grade. It would be unlawful to operate a documented fishing vessel without the appropriate certificate. The Coast Guard could be empowered to take or suspend the certificate in cases where it is warranted. This would preclude the need for the fishermen to travel to a sometimes distant Coast Guard office for a license, and the additional cost of a Coast Guard license. This also could do away with the need for additional Coast Guard billets for licensing.

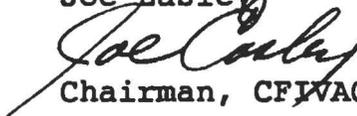
5) Character and habits of life: These are sensitive issues for many in the fishing community. Given the nation-wide push for drug and alcohol free transportation workers, drug use will probably have to be considered. Character, physical fitness, recency of service, and professional qualifications would require study, taking into account the great diversity of fisheries. The Committee felt that we would get more cooperation from the community by keeping things simple--and inexpensive-- as possible. However, if the need for a background check along present Coast Guard lines for licensing is wanted, it may require some more

billets in the Coast Guard.

As you can see, the discrepancies are reconcilable. Before any further steps are taken, our strong recommendation is that a small Coast Guard, Advisory Committee working group be formed. It is important that different points of view be presented during the development of a plan, rather than afterwards. We are all working for a safer workplace for the fisherman.

I hope this responds to completely to your request, if it does not please me know, and I will try to have the Committee fill in any holes you think need more work. Thank you for your continued interest and support.

Joe Easley


Chairman, CFIVAC

cc. Admiral Henn USCG
CFIVAC Members

PS: Since I first sent this letter out as a draft to the members of the Committee and the Coast Guard, I have been notified that the Coast Guard has agreed with forming a small working group. It will meet in September with the object being to see if we can come with a joint recommendation for licensing of documented fishing vessels. I understand this has the very strong support of Admiral Henn. ✓