



15 June 2015

To whom this may concern:

The Association for Professional Observers (APO) is an all-volunteer nonprofit organization dedicated to the integrity of fisheries monitoring programs. This is a letter of support for the continuance of funds necessary for Public Employees for Environmental Responsibility (PEER) to carry out its activities.

The APO supports transparent fisheries monitoring programs that are science-based. We also advocate for the safety and welfare of fisheries observers in order that they may carry out their duties free of harassment, interference or assault. We have worked with PEER since 2007 because of our similar goals of government transparency and accountability.

All bycatch reports from commercial fisheries are based on observer data and sometimes observers experience intimidation, interference, harassment, and occasionally assault in the course of their duties to monitor these fisheries. The position, even at the best of times, is considered to be fraught with high stress, loneliness, danger, unpredictability, and job insecurity. This results in a high attrition rate, which lowers the efficiency and quality in which observer programs gather information from the fisheries. Since observer data is one of the primary sources of independently derived information used to manage the fisheries, the APO strongly supports transparency in the nations' observer program data and management. We do this to ensure that observers are getting the necessary programmatic support to promote their high retention and professionalism and also to promote public access to the data, which is critical to government transparency and effectiveness.

PEER has assisted us in applying for Freedom of Information Act requests where federal programs have not obliged us with release of information. Because we have neither the capacity nor legal expertise, we have relied extensively on the legal expertise that PEER has provided us. PEER has also served the public to increase public exposure to important observer program related issues.

PEER has been one of the few organization besides our own to champion the welfare of fisheries observers and their ability to do their job free of harassment and

interference. They have assisted us with their legal experts to challenge the agency to release data that nobody else sees. We exist under IRS Tax status 501(c)(5), which makes it difficult to obtain financial capacity to carry out our mission, so we depend on the expertise at PEER.

Some of the services PEER has provided us include:

1. An annual FOIA request for harassment and interference reports since 2006, which we have used to track how observers are treated;
2. Legal help with a 2009 FOIA request regarding NMFS policy on release of information. This resulted in a greater public understanding of how NMFS manages observer data;
3. Assistance with exposing greater industry control of monitoring programs on the east coast;
4. Increased exposure in 2010 of the lowering of observer hiring standards and quality of data collection;
5. Jointly with APO, PEER launched a major investigation into the mismanagement of the Southeast regional observer programs, which monitor commercial fisheries from the Gulf of Mexico, south to Brazil and north to Canada. This resulted in an expanded national review of observer programs and PEER helped us expose where these reports fell short in effectiveness.
6. Highlighting whistleblower protections for observers and other federal contractor employees gained in 2013 and jointly wrote letters on observers' behalf.
7. Exposed contradictions in federal programs designed to replace observers with cameras.

These are only a handful of the ways we have relied on this organization's assistance and we are extremely grateful to them. We would highly recommend the continuance of funds needed for this critically needed organization.

Thank you,

Elizabeth Mitchell, President
Association for Professional Observers (APO)