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on the PMP and related subjects
(excluding the question of salmon)

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I. Fishing and loading privilege inside 12 nautical miles of the U.S. coast

1. Fishing inside 12 miles of the Aleutian Islands and in the Dutch Harbor-Sand Point Area

1) Draft Preliminary Fishery Management Plan proposed the prohibition of Japanese longline fishery in the following areas.

(a) Within 12 miles of and beyond 3 miles from the Aleutian Islands

(1) in the waters off the Pacific coast of the Aleutian Islands between 169°00' W and 166°00' W

(2) in the waters off the Bering Sea coast of the Aleutian Islands between 169°00' W and 166°45' W, and between 165°45' W and 165°00' W

(b) In the Dutch Harbor-Sand Point area from 163°04' W to 166°00' W

2) According to the explanation given in the Draft Preliminary Fishery Management Plan, the purpose of establishing new regulations is to prevent conflicts between U.S. fishing vessels and foreign vessels.

During the discussions at the working party, the Japanese delegation pointed out that there should be no gear conflict between the Japanese longline boats and the U.S. fishing boats due to the fact that the former fish at deeper depth than the latter. It sees no reason for the proposed prohibition of the Japanese longline fishery in the areas in question.

2. Loading privilege inside 12 miles of the U.S. Coast

The Japanese delegation proposes that the loading privilege in the following localities within 12 nautical miles zone under the present bilateral agreement be continued without change.

- 1.) Off the Bering Sea coast of the Aleution Islands:
 - (1) 165°W - 166°45'W Dec. 1 - May 31
 - (2) 166°45'W - 169°00'W Feb. 16 - Sept. 14
 - (3) 169°00'W - 170°00'W year round
 - (4) 170°00'W - 172°00'W "
 - (5) 172°00'W - 176°00'W Apr. 1 - Oct. 31
 - (6) west of 176°W year round
- 2.) Off the Pacific coast of the Aleutian Islands:
 - (1) 166°W - 169°W Feb. 16 - Sept. 14
 - (2) 169°W - 172°W year round
 - (3) 172°W - 178°30'W Apr. 1 - Oct. 31
 - (4) west of 178°30'W year round
- 3.) Off St. Matthen Island
 - (1) on the north side,
172°29'W - 172°46'W year round
 - (2) on the south side,
172°17'W - 172°35'W "
 - (3) on the south side,
172°54'W - 173°04' "
- 4.) Off St. George Island of the Pribilof Islands Nov: 1 - Apr. 30

- 5.) Off Umnak Island
- (1) on the north side,
168°25'W - 168°40'W Oct. 15 - Dec. 31
 - (2) on the north side,
168°50'W - 169°00'W "
 - (3) on the south side,
168°15'W - 168°30'W "
- 6.) Off Unalaska Island
- (1) on the north side,
167°15'W - 167°30'W Jan. 1 - Oct. 14
 - (2) on the south side,
167°18'W - 167°40'W "
- 7.) On the west side of Sanak Island,
in the waters bounded on the north
by 54°36'N, on the south 54°26'N,
on the west by 163°05'W and on
the east by 162°40'W. year round
- 8.) North of Tonki Cape on Afognak
Island, in the waters bounded
on the north by 58°35'N, on
the south by 58°25'N, on the west
by 152°02'W and on the east
by 151°52'W year round
- 9.) Off Kayak Island
- (1) on the east side,
59°48'N - 59°56'N,
west of 143°53'W year round
 - (2) on the west side,
59°52'N - 60°07'N,
east of 145°W year round
- 10.) Near Forrester Island, in
the waters bounded on the
north by 54°54'N, on the
east by 133°16'W, and on
the south by 54°44'N year round
- 11.) Near Destruction Island,
47°36'N - 47°45'N year round

II Basic position on the Japanese crab tanner crab fishery

1.) At this session of INPFC, the B & R Committee agreed that the condition of tanner crab resources in Eastern Bering Sea is in good condition. The allowable level of catch recommended by Japanese and US scientists is as follows:

Japan	125 mil. crabs (carapace width over 130mm for Baerdi and over 110mm for Hybrid and Opilio)
US	101,200 metric tons (= 100 mil crabs)

Number of crab caught by Japan and US in 1976 were as follows:

Japan	12,571 thousand crabs
US	8,956 " "
Total	21,527 " "

Above figures show that not more than about 20% of total allowable catch as estimated is presently being taken.

2.) The US Preliminary Management Plan for tanner crab which has been made available only recently set 101,200 metric tons as total allowable catch which will allow a considerable increase of catch over the present level. The same PMP estimates the US domestic catch capacity at 91,000 tons which is more than 10 times of US present level of catch, while holding the allocation for Japan at present level. We are not informed what kind of rationale has been used to estimate the projected US catch, but we seriously doubt that the projected increase of US capacity over 10 times

of present level during the course of one year could be sound and realistic one. It is hoped that such an unrealistic projection for US catch be rectified and that the surplus thus generated be made available for Japanese fishermen.

3.) An argument was put forward at the occasion of the last August session of Japan-US negotiation to the effect that whole tanner crab fishery be monopolized by US fishermen. Such an argument is not only unfair but also totally unjustifiable in view of the resource situation and present US fishing capacity.

4.) Japanese crab fishing industry has been already subjected to stringent regulation more than what is needed for the purpose of resource conservation, including the restrictions on number of vessels, catch amount as well as time and area closures. The operation is under strict control of these regulations in the presence of US observers on board. Therefore it is neither necessary to add any further restrictions to the present ones nor is it possible to convince our industry of such necessity.

5.) There might be an argument, taking advantage of so-called optimum yield concept which is provided in US Fishery Conservation and Management Act, although the concept is far from clearly-defined, that Japanese tanner crab fishery be excluded for socio-economic reasons. We believe that the total allowable catch must fundamentally be determined on

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the basis of the maximum sustainable yield or the sustainable yield. Even if one accept the socio-economic considerations be taken into account in determining TAC, such an adjustment should not go beyond the common sense. In other word, such argument should not be used as a means to justify the intended monopolization of fishery or market available for the foreign fishing nation, when there is the large surplus in the resources.

In this connection, we are aware of another argument by some of US fishermen that they do not like to operate in the same area with foreign fishermen. However, since the resource is abundant and no substantial gear conflict is occurring, it goes without saying that such an argument is totally unjustifiable.

6.) The suggestion has been made elsewhere that carapace width restriction (at 5.5 inches \approx 14 cm) be introduced because such is already the case under US domestic regulation. We are given to understand that the size limitation was introduced to protect mainly the resource of Prince William Sound where the signs of depletion was evident. Since P.W.S. stock is quite separate from the one in the Eastern Bering Sea, there is no reason for the same regulation to be introduced in the Bering Sea in view of the present level of abundance of the resources.

7.) There also seems to be a suggestion that *C. Baerdi* and *C. Opilio*, which make up present stock of tanner crab resource in the Eastern Bering Sea along with certain amount of both subspecies, be managed separately. In view of the abundance of both subspecies, there should be no practical need for separate TAC for these subspecies. Especially this is true if we take into account of the fact that present regulation on Japanese fishery for separate quota for each area substantially serve to restrict the Japanese catch of *C. Baerdi*. Moreover we would like to point out the practical difficulty of differentiating these subspecies as well as hybrid of both subspecies during commercial operation which might be common problem with the case of US fishermen.

8.) In conclusion, resource condition of the tanner crab in the Eastern Bering is satisfactory and no further restriction on any aspect of Japanese crab fishery should be justified. In this connection we would like once again to underline the fact that present area assigned to Japanese fishery is already minimum necessary for attaining the quota and therefore any further restriction on the area is totally unacceptable. Rather resource condition as well as present level of US capacity should warrant an increase of allocation for Japan.

Japanese

Japanese fishery has been pioneer of tanner crab fishery in the Eastern Bering Sea. It has developed fishing ground and market for the products after many years of exploratory effort and economic risks. Should these facts be neglected and treated improperly, not only our industry but also while Japanese nation who are fully aware of the history of our crab fishery would seriously ask the question where is the fairness and this might hamper the friendly relation existing between our two countries.

III. Whales and billfishes

With respect to fisheries which are excluded by or not mentioned in the draft Preliminary Management Plan, Japan has performances as described in the attached papers. We request that U.S. give serious considerations on these facts and ensure the continuation of these fisheries.

1 Whales

- 1.) During the present discussions, the United States delegation indicated to us that the US intends to prohibit the taking of sperm whales in the waters within its jurisdiction on the basis of the domestic law that stipulates the sperm whale as an endangered species.
- 2.) This decision is obviously contrary to the unanimous decision of the International Whaling Commission that sperm whales in the North Pacific are far from the endangered state and that they are well above the level that gives the maximum sustainable yield.
- 3.) The prohibition of whaling, if it is implemented, will be bound to have irretrievable adverse effects on the Japanese whaling industry on the following reasons.
 - a) Major migration routes of the sperm whales, or any other species of whales for that matter, are along the continents or chains of islands. For this reason, about 40% of the Japanese catch of sperm whales and 20% of Bryde whales are currently caught within the 200 mile zone of the US.

There are no other whaling grounds; except some of limited scale, in the open waters in the eastern Pacific.

- b) It is not desirable or impractical to increase substantially the efforts in the western Pacific

beyond

beyond the present level, since it may very well lead to over-exploitation of the stocks over there. The industry nor the Government of Japan can risk the possibility of such overexploitation. They are committed to the policy of the International Whaling Commission that no whaling should be permitted on any stock whose population is found to be below the level that gives the maximum sustainable yield.

Note; Only two species of whales are caught in the waters off the coasts of the U.S.; namely Sperm Whales and Bryde Whales.

2. Billfishes

1.) Billfishes and oceanic sharks, which are listed in the Revised Single Negotiating Text of the Law of the Sea Conference as highly migratory species, are no less migratory than at least some of the tuna species. It is therefore our view that they should be treated in the same manner as tunas for the conservation and rational utilization of the resources.

2.) In the tuna long-line fishing, catch of billfishes and oceanic sharks is inevitable and unavoidable, although their catch is comparatively small. The undue restrictions on billfish or oceanic shark fishery beyond the conservation requirements are bound to lead in substance to the total prohibition of the tuna longline operation which cannot be justifiable.

3.) Setting aside our legal position, the Japanese delegation is prepared to consult with the U.S. delegation with a view to minimizing the conflict between the Japanese long-line fishery and the U.S. interests in sport fishing.

IV. Comments on stock condition and TAC as proposed in EMP

During the discussions at the working level, the Japanese delegation expressed the following views on the status of the stocks:

a) West coast

1. Pollock (Bering Sea)

During the INPFC sessions, the Japanese scientists presented the results of their detailed analysis on this species. Using the changes in the abundance indices and in the age (length) composition of the catches over the past years, they estimated the size of biomass and sustainable yield that the pollock stock can produce. The latter for 1977 was estimated to be no less than 1.1 million metric tons.

The United States scientists were of the view that the total catch for the 1977 season should not exceed 850,000 metric tons. However, their conclusion was presented to the meeting without substantiating results of computations.

It is possible to calculate, on the basis of the figures quoted in the preliminary management plan, the sustainable yield. The results of such calculation by our scientists gave the figure of 1.1 million metric tons, which is close to the Japanese estimate.

At

At the INPFC, the substantial discussions were made on the relationship between spawners and recruitments.

Scientists of the three countries agreed in this context that there is no quantitative relations in the two.

All in all, the Japanese delegation wished the US scientists to carefully review their estimates in light of the discussions and scientific evidences submitted to the INPFC.

2. Pollock (Gulf of Alaska)

At the 1976 INPFC meeting, Japanese scientists submitted the paper on this stock in which they estimated the sustainable yield of this stock to be about 200,000 metric tons.

The United States did not present their views to the INPFC.

According to the PMP, the United States estimates on the basis of trawl surveys the potential yield of this stock to be in the range from 168,000 to 338,000 metric tons, as compared with the Japanese estimate of 200,000 metric tons.

The PMP did not, however, recommend its estimated potential yield to be TAC which was 75% of its lowest limit.

Since the stock is only lightly exploited at present and in view of the biological and ecological nature of this species, the Japanese scientists do not see value in recommending too conservative a figure.

The Japanese delegation is of the view that the TAC should be set somewhere between the Japanese estimate (200,000m.t.) or the meridian of the range of the US estimates (250,000m.t.).

3. Black cod. (Bering Sea and Eastern Pacific)

At this INPFC meeting, scientists of the three contracting countries agreed that the stock is now being fully utilized.

The estimated sustainable yield of this stock by the Japanese scientists as presented to the INPFC was 43,000 - 52,000 metric tons and it is their logical conclusion that the TAC for the next season should be held within this range. The U.S. scientists, on the other hand, proposed a figure of 41,600 metric tons, although they did not explain how this figure was arrived at.

In the absence of their explanation, our scientists confirmed through their own calculation on the basis of the same data as used by the U.S. scientists and the same method that the U.S. scientists employed in the last year's document of the INPFC that the result is not different from the above Japanese figures.

The Japanese scientists also pointed at the INPFC that the U.S. indices of abundance based on the catch per vessel-day is incomplete and biased towards under-estimation. When corrected for this bias, the U.S. estimate would be much closer to the Japanese estimate.

There is a discrepancy in the views of scientists between both countries as to if the stock should be treated as a whole or regional basis.

Since

Since no spawning ground or juveniles have ever been found in the Bering Sea and Aleutian region, it is very likely that there is no discrete stock in the Bering Sea. Hence, Japanese scientists are of the view that the regional allocation of the quota needs to reflect the above fact.

- 4 Pacific ocean perch and rock fish (Eastern Bering, Aleutian and Northeast Pacific Ocean)

Japanese scientists noted that there is inadequacy and bias in the handling of the data by the US scientists. The US abundance indices of POP in the Aleutian regions are calculated without taking into account the changes of vessel size, thereby leading to the underestimation of the abundance in recent years. Their calculated CPUE also failed to consider the consequences of the cessation of the directed fisheries for POP in the Bering Sea several years ago. CPUE values for POP in the Gulf of Alaska in recent years are calculated without taking into consideration the effects of the imposition of the catch quota and time and area closure regulation.

The U.S. side is also assumed without any supporting evidence that the decrease of CPUE values observed by US research vessel in the central part of the Gulf of Alaska represent the over-all picture in this area. Due to the bias mentioned above, the TAC proposed in the FMP are much on the low side.

On the basis of detailed analysis by the scientists, the Japanese delegation concluded that the TAC for POP should be no less than 21,000 tons in the Bering Sea Slope, 45,000 tons in the Aleutian Area, and 61,000 tons in the Gulf of Alaska and northeastern Pacific combined (including the waters off Canada). For rockfish, it also stated that TAC should be set in the range between 19,300 and 24,900 tons (including 10,000 tons available for Japan) in the Gulf of Alaska and the northeastern Pacific (including off Canada).

5. Herring (Eastern Bering Sea)

The PMP proposes TAC for herring in the Eastern Bering Sea to be reduced to 21,000 tons. The abundance of this resource in recent years appears to be held on a more or less same level, although it heavily depends on the size of recruitment. Meteorological and oceanographic conditions in the fishing grounds are also the major cause of fluctuations in total catch.

There are bound to be years when adverse ice and sea conditions prevent the fleet from making full use of the quota.

In the reasons stated above, the Japanese delegation sees no validity in the proposal to reduce the herring quota from the present level of 45,000 tons for trawl fishery and 3,000 tons for gillnet fishery.

The reduction of the quota for the gillnet fishery is particularly damaging to the fishermen concerned. Although herring fishery is of seasonal nature, the catch constitutes an indispensable portion of their income and the reduction as proposed in the PMP may very well lead to the collapse of their whole economy.

The herring fishermen engage in longline fishing for black cod before and after the herring season.

6. Pacific cod, other flounders and other fishes (Eastern Bering Sea)

As is described in the B & R Report submitted to the INPFC this year, the stock conditions of these group of fishes are satisfactory, whereby requiring no need for the reduction of their quotas. Since these species are caught incidentally to other fisheries, the total catch of this group depends largely on the intensity of the directed fisheries for other species than those assigned to this group and the fluctuating availability of stocks of these by-catch species.

Therefore, TAC based on the average catch of the past as proposed by U.S. is bound to cause the total catch over the years to decline to a considerable extent, when the magnitude of major fisheries remains more or less unchanged.

Besides the question of the reduction of the quotas when it is not necessary for the conservation purposes, the reduction of the quotas for incidental species brings about more serious problem on the major fisheries. When the availability of cod, for example, to the pollock fishery is higher than the average, the quota for cod will have to be completed at the date earlier than the usual date of closure of pollock fishery, in advance of the attainment of pollock quota.

The Japanese delegation stressed that the reduction of the catch is not justifiable in the light of the conditions of the stocks of these incidental species, and that if the step be taken to limit the catch to the highest catch in the past several years, then the total aggregate catch during the period would not increase over the catch in the corresponding past years.

With respect to other species, the Japanese delegation called the attention of the US delegation that this category in the PMP consists of miscellaneous species to be caught incidentally but that it comprises those species with large potential enough to sustain directed fisheries of substantial magnitude in future years. Squid is one such example. It is the view of the Japanese delegation that if and when a new directed fisheries be developed for one of the species in this category, then a separate quota should be established for it in proportion to the productivity of the resource.

With respect to the quota for the other species category, the Japanese delegation further referred to the statement on P 108 of the PMP for trawl fishery of the Bering Sea and Aleutian Islands to the effect that the TAC for this species category to the effect should be reduced gradually until it reaches no more than 2% of the total catch.

The Japanese delegation did not find validity for such an approach for the following reasons.

a) In the PMP, there are proposed no species which are not covered by the quota system. Therefore there is no room for developing uncontrolled fisheries either under this or any other categories.

b) At moment, there is no directed fisheries for any of the species in this category. And hence, none of them has even been exposed to full exploitation.

c)

c) Should the quota for any incidental species be held at an unreasonably low level, the operation of the major fisheries would have to be seriously affected even to the extent that the attainment of the quotas for major species may be made impossible.

All in all, there is no scientific reason for the reduction in the quota for this category.

7. Shrimp (Eastern Bering Sea)

The Japanese shrimp fishery in the Eastern Bering Sea has operated around the Pribilof Islands. The total catch as of the end of October in 1976 is about 400 metric tons.

Considering the long history of the Japanese shrimp fishery in the region and there has been no conflict in the region between the Japanese shrimp fishery and U.S. fishery, there should be no difficulty for the continuation of the Japanese shrimp fishing in the area at least at the present level, pending more evidence for the recovery of the resource becomes available.

8. Unexploited species

1) With respect to the other species category in the PMP, the Japanese delegation pointed out that there is concensus among the INPFC scientists of the three countries that there are still a number of large resources still practically unexploited in the Being Sea and the Gulf of Alaska.

To name the few, they are squid, capelin, sand eel and Atka mackeral.

2) Although it is intended in the PMP that all of these species be treated under the other species category, the Japanese delegation is of the view that the other species should not include those species which are taken by directed fisheries.

3) The Japanese industry is now contemplating to initiate squid fishery in the Bering Sea as directed fishery and wishes to be allocated a quota of a minimum of 10,000 metric tons.

The Japanese delegation considers that in the light of the large potential of this resource the industry's request is modest and justifiable.

9. Seamount Groundfish Fisheries

1) Trawl Fishery

(1) Several north Pacific trawlers operate in the Emperor Seamount area for a certain period of the year enroute to and from the Bering Sea and Gulf of Alaska.

(2) Their annual catch combined, mostly Armorheads, was 19,957 metric tons in 1975, about 10% of which was caught within the U.S. 200 miles.

2) Bottom longline fishery off the Midway Islands

(1) About 16 vessels of 250 to 500 gross tons annually operated in this area in recent years.

(2) Their annual combined catch is estimated at not more than 4,000 metric tons, with about 500 metric tons caught within the U.S. 200 miles. The target species is Alfonsins.

3) Angling off the Guam and Mariana Islands

(1) Eight vessels, mostly of less than 20 gross tons, operate annually in this region.

(2) Their annual catch is 500 to 600 metric tons, consisting of a variety of species including Alfonsins.

4) The Japanese delegation expected the continuation of this fishery.

10. Precious Corals Fishery

- 1) About 90 vessels are engaging in precious corals fishery, of which 26 vessels are specialized in harvesting precious corals (Red Corals) (harvest season: Mar.-Nov.). The size of these specialized vessels is between 90 to 130 gross tons.
- 2) Their harvesting grounds within 200 miles off the coasts of the U.S. are off the Midway, Wake, Yap and Saipan Islands.
- 3) The total harvest by 26 specialized vessels in 1975 was about 100 metric tons.
- 4) The Japanese delegation expected the continuation of this fishery.

b) East coast

Comments on the Fishery Management Plan for Loligo and Illex (ICNAF Area)

1) It is understandable that the U.S. is attempting to develop her squid fishery in the ICNAF Subarea 5 and Statistical Area 6. However, the Management Plan does not indicate any practical basis to ensure the possibility to develop her squid fishery to an extent that the U.S. fishery can achieve her squid quota amounting to 37,500 tons (Loligo and Illex combined) for 1977. Japan has serious doubt that two thousands tons of squid catch by U.S. in 1975 can jump up more than ten folds in a year or two. This is a very reason why the Japanese Delegate to ICNAF is proposing some consideration on the reallocation of Loligo at the forth coming special meeting.

2) Unused portion of quota can be utilized to certain extent in the next fishing season in the stock of fish with longer life span. In the short life span animal like squid, unused portion is entire waste of resource.

3) With regard to the estimated biomass of Loligo, the results from "most useful estimate" by U.S. bottom trawl survey are shown in Table 31. The estimated biomass of this species was 29,500 tons in 1972 but the total catch in that year exceeded 36,000 tons. The results from "most useful estimate" are apparently of underestimation.

4) U.S. scientists assume a moderate stock-recruit relationship in Loligo. This assumption contradicts recent

trend

trend of the abundance of this species. Despite sharp increase of the total catch since 1970, the abundance of Loligo estimated by U.S. scientists have been increasing greatly since 1973.

5) We have seen some basic defects in the stock assessment of Loligo. Taking these into consideration, the Japanese scientists would prepare revised assessment and submit it at the next annual meeting of ICNAF.

6) Since no stock assessment is yet available for Illex, the total quota of 35,000 tons is simply a preemptive one without any scientific basis. Japanese scientists are of the opinion that the allowable catch of this species must be far greater than the current quota. During the 1976 fishing season in particular, fishermen observed extensive distribution of Illex in this area.

7) The U.S. proposal to extend the closed area for bottom fish fishing gear made at the last annual meeting was to reduce the amount of by-catch. The proposed closed area suggested in the Management Plan, however, is simply to avoid the gear-conflict between squid fisheries and the U.S. lobster pot. Needless to say, the closed area should be defined to fit purpose intended.

V. Comments on ²⁵some of the regulation
as proposed in FMP

1. Closure of the area after the attainment of the quota

The FMP proposes that the entire region be closed to fishermen of a nation when that nation's allocation of any species is exceeded.

The proposal is unrealistic in that it fails to meet adequately the following situations:

For example, some of our longliners engage in herring gillnet fishing during spring and summer months. Their fishery ceases with the completion of the quota in early to mid summer or, if not, by the end of summer, and then they switch to longlining for cod.

The proposed regulation in the FMP in the present wording requires the evacuation of the area by the boats after the national quota for herring gillnet fishery is completed, thereby denying them to switch to black cod long line fishing in the area. The effects of such regulation are not limited to the herring boats, since the regulation calls for the cessation of pollack and other fisheries with the end of the herring season.

2. Preliminary observation on the amount of fees.

- 1) The United States delegation indicated that it does not intend to impose fees on foreign fishing vessels in such an amount as might obstruct their economical operation.
- 2) The Japanese delegation is, however, seriously concerned with the possible impacts of the US proposal at their negotiation with Mexico that it is prepared to accept a fee up to 5% of the total ex-vessel value of the catch for US shrimp and tuna fishing off the Mexican coasts.
- 3) Such a high rate is obviously much beyond the financial capability of our industry which has been seriously plagued by the rising costs and depression since the 1972 oil shock.
- 4) Almost all of our fishing boats are operating at about the break-even point and are not in a position to bear any substantial expenditure in addition to their present operational expenses.
- 5) Our industry is prepared to explain in full to those who are concerned the financial status of their operations off the coasts of the US.
- 6) Support vessels should be exempted from payment of such fees.

3. Statistical reporting as required under PMP

1) US draft PMPs for trawl fishery of the Bering Sea and Aleutian Islands, the same fishery of the Gulf of Alaska as well as for Sablefish in the both areas request two kinds of statistical reporting namely:-

(1) Annual reporting (calendar year)

Catch and effort (trawl hours)

by 30' (lat) x 1° (longi) area, by vessel class,

by month, by gear type and by species

time limit: 30th May next year

(2) Monthly reporting

Catch and effort (vessel days)

by INPFC Area (I--IV), by vessel class, by

gear type and by major species

time limit: end of next month

2) Annual reporting

a. Content of informations

(i) As to mothership trawl, northern trawlers and land-based dragnet fisheries the information requested are in general available under present system except some discrepancies in species classification with respect to Atka mackerel, and any other species exceeding 1,000 tons. Especially the last mentioned

mentioned one might cause problem because of the difficulties in arranging in advance for such reporting from individual fishing vessels, while the question of Atka mackerel could be solved in due course.

- (ii) As to black cod long line fishery, only problem is that at present we do not have information on fishing effort other than number of Hadri. Reporting of fishing hours, if such is to be requested, might need some time for fishermen fully to adapt to and comply with.

b. Reporting period

Under present arrangement of INPFC, for mothership trawl fleet, Northern trawlers and long line fisheries, we use November--October fishing year and for land-based drag net fishery the calendar year.

Draft FMP requests all the information on calendar year basis. This causes problem of continuity for both foreign and domestic users or otherwise duplication of work on the part of Japan. Some adjustment is necessary especially taking account of the views of INPFC scientists on one hand and amount of additional work on the part of Japanese fishery statistics officers on the other hand.

c. Time limit for reporting

Under present system for all the fisheries referred to above 9 months after the end of the season are minimum

necessary

necessary for submission of the annual report.

9 months consists of mainly waiting time for submission of catch record from individual vessels (since most of them are still on the fishing grounds at the end of either fishing year or of calendar year) and checking of errors in individual record (especially in the case of smaller vessels like land based dragnet and long line fishery). We shall spare no effort to minimize the delay in final reporting, but 7 months after the end of the year would be the minimum necessary period to be attained after a few years of gradual progress.

3) Monthly reporting

(a) Mothership trawl fleet and Northern trawlers

For these fisheries, there would not be much difficulty except that area is reported by INPFC Halibut regulatory areas and effort in trawl hours instead of vessel days. Rectification of above situation would be possible starting from 1978.

They can comply with time limit of the end of the next month.

(b) Land based dragnet fishery and black-cod long-line fishery

This is the field where we face with greatest difficulty, since they are small vessels operated by individual small owners and are not equipped with good communication facilities nor are they accustomed to frequent reporting of such comprehensive informations as requested.

We

We undertake to explore the possibilities in consultation with the industry people so that we can comply with the request, but at least for a few years of initiation some delays seem to be inevitable especially in case of land-based drag-net fisheries.

- 4) Biological informations and reporting of other fisheries in other regions

Although our preliminary reaction is that there seems to be no substantial difficulties, we think that these subjects should best be dealt with between scientists and experts of both countries who are directly involved in these fields.