

Report to North Pacific Fishery Management Council from
Foreign Permit Review Subcommittee

The Committee reviewed the draft foreign fishing regulations and Draft Fee Schedule and has the following recommendations:

The access fee should be raised to \$2 per ton with no upper limit; the allocation fee to remain at 3.5% of the exvessel value.

This was discussed at length and the rationale that prevailed was that this will bring the fees into parity with those paid by domestic fishermen.

Draft regulations were discussed at length with numerous recommendations. It was determined that both the Coast Guard and National Marine Fisheries Service had submitted comments on the regulations, Alaska Department of Fish & Game attorney Jeff Haynes reviewed the regulations, copies of the agency's comments are quite lengthy and are submitted as a part of this report. (NPFC/ID#1,2, and 3) (attachment #33,34, and 35)

It was noted that shrimp, snail, and blackcod plans do not have a specific prohibition against taking crabs. It was recommended that the Scientific & Statistical Committee draft a general section to sub part A stating that it is unlawful to take continental shelf creatures unless otherwise authorized.

In reviewing Foreign Permit applications, the subcommittee was guided by the "Qualitative versus Quantitative" approach suggested by Chairman Rasmuson. It was immediately apparent that certain statistical data should accompany the permit applications when they are submitted to the Council for review. A draft summary of the needed information was drawn up, the information can be designed into a suitable form, a copy is submitted as a part of this report. It is recommended that the Executive Director prepare a procedure for Permit Review for the Council. (NPFC/AP#1) (attachment #28)

It is recommended that Permit Review should include consideration of past violations.

It is recommended that the by catch of all species be limited as appropriate to the area in which the fishing takes place, taking into consideration the TAC's surpluses and allocations of the species involved in the by catch.

-2-

Council feels strongly that Council should make a strong presentation to the Secretary of State and Secretary of Commerce prior to them making allocations and not merely comment "after the fact."