


MEMORANDUM

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke
Executive Director 

DATE: September 29, 1998

SUBJECT: Review provisions of Manager's Amendments to S.1221

ACTION REQUIRED

Review provisions of Manager's Amendments to S.1221.

BACKGROUND

There have been several meetings of industry with Senate staff to work out provisions of S. 1221 which would overhaul the management and composition of the BSAI pollock fisheries. As we go to press with the Council meeting notebooks, the manager's amendments are a work in progress. I will try to have the latest version available for your review on Wednesday, October 7. I have invited Senator Stevens' principal fisheries staffer, Trevor McCabe, to brief the Council.

KRIS POULSEN & ASSOCIATES

COMMERCIAL FISHING VESSELS • M/V BERING SEA • M/V ARCTIC SEA • M/V NORTH SEA

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September 22, 1998

The Honorable Slade Gorton
730 Hart Senate Office Building
Washington, D.C. 20510

RE: Agenda Item C-9, Implications of S.1221

Dear Senator Gorton,

I am a member of the Bering Sea crab industry and am very concerned about the implications of S.1221 for this industry. In reviewing the current language of S.1221, it no longer resembles the initial language and now has grave implications for the Bering Sea crab industry, which is comprised mainly of large vessels with homeport in Seattle.

In particular, there are three items which are extremely offensive and unacceptable for the Bering Sea Crab industry:

1. A landing in 1997 as the only requirement for a license for crabbing. Anything other than a landing in both 1996 and 1997 is unacceptable, as it forecloses future consideration of a permit buyback program.
2. The allowance of cooperatives within the trawl industry.
3. The total lack of input crabbers and other affected sectors were allowed in this process, and the fact that these issues should be decided by the North Pacific Fishery Management Council.

I would like to give you some historical background as to the reason why I, and the vast majority of crabbers find fault with the preceding three points.

1980-1983

These years formed the "King Crab Crash" which resulted in a 66% decrease in average crab vessel revenue. Many vessels converted and crossed over to trawling at this time due to grim future prospects in the crab industry. These trawlers have rarely fished crab since this time, and have never relied upon it financially. The trawl "A" season

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and opilio crab season (Over 70% of income is derived for the respective industry during these seasons) have historically occurred in conjunction. For this reason, trawlers have not economically depended upon crab since the early 1980's. The 39 trawlers under consideration are pioneers of the trawl industry and a huge expense to the crab industry, both from revenues lost due to bycatch mortality and periodic directed fishing.

No Trawl Zone 1981-1985

Trawlers and major processors fought to have the historic crab sanctuary (no-trawl zone) opened to trawling. This zone has been an extremely important area for the protection of king crab from the effects of trawling. This area was opened to trawling in 1981 resulting in a huge amount of bycatch and waste of king crab by trawlers, creating significant losses for crabbers. The Alaska Crab Coalition (ACC) was formed in order to combat this blatant disregard of the entire crab industry. A no-trawl zone was re-established in 1986 by the ACC. However, it was much smaller and did not cover some critical area for the red king crab. If it had not been for the ACC, these trawlers who call themselves "pioneers" would have destroyed the crab resource.

Future of Groundfish Committee (FOG Committee) 1987-1988

The FOG Committee was composed of representatives from all fishing industry sectors. The task of this Committee was to find ways in which to deal with imminent overcapitalization in all Bering Sea fishing industries. The FOG Committee recommended to the North Pacific Fishery Management Council (NPFMC) a moratorium on new entrants. This recommendation would have created a much more healthy Bering Sea fishing industry, and S.1221 or any license limitation would not be necessary. However, the trawlers and major processors fought this action delaying the moratorium 6 years with no curtailment of new entrants into any fisheries.

Individual Transferable Quotas (ITQ's) 1990-1995

ITQ's were discussed for certain Bering Sea fisheries (Halibut, Crab, and Groundfish) very seriously during the first half of this decade. In particular, crab was a likely candidate of such a program due to safety reasons (Bering Sea Crab fishing is the most dangerous industry in the U.S.). The current Halibut/Blackcod fishery shows the increased safety benefits of an ITQ. ITQ's would allow fishermen to fish around the weather, instead of fishing through

unsafe weather under the current olympic style fishery. However, the trawlers and major processors sunk this crab ITQ program. Now, the trawlers and processors are legislating their own two pie ITQ program through a cooperative. This cooperative will allow them to transfer quota from vessels just as an ITQ would and free up crossover boats to fish the major crab fisheries.

Industry Funded License Buyback Plan (LBP) 1996-1998

The LBP was designed by members of the crab industry to deal with the overcapitalization of the crab industry, which could have been dealt with many times in the past. However, the trawlers and major processors always wanted a little more and would not allow the gates to crab or trawling be closed. The LBP is designed to buy enough licenses to maintain the fleet below 200 vessels. The addition of 39 trawlers to the crab industry, combined with a cooperative fishing agreement for these trawlers, greatly increases capacity in the crab industry. Basically, the trawlers are scuttling attempts by the crab industry to limit capacity. In addition, they will ironically use proceeds from the crab to pay back their \$70 million buyback loan.

Current Situation

The current average crab vessel revenue has fallen to the same level as in 1983, when many crabbers permanently crossed over to participate in the groundfish industry. However, crabbers now have no other fishery to cross over to and the entire crab industry is teetering on the economic brink. Instead of being granted some form of relief, we are in jeopardy of having 39 pollock vessels grandfathered into our fishery and able to fish full-time. Average crab vessel revenue is now only \$600,000 (this is almost certainly below average break even) while trawlers average three times this amount. S.1221, or an LLP amendment that allows speculative pollock boats into crab fisheries, will lead to mass bankruptcies for the crab industry and a loss of life by many crab fishermen.

Conclusion

Allowing 39 additional trawlers to enter the crab industry is entirely unfair. These vessels made an economic decision in the early 1980's to become trawlers, and have not relied upon crab since. The crab industry is already massively overcapitalized, without the addition of these 39 trawlers. The addition of these 39 trawlers with the cooperative will make the average crab fisherman

go bankrupt. There are also 128 crab vessel with trawl licenses. This license to trawl is worth well over \$1 million per license. However, these 128 crabbers are willing to give up this right if, and only if, trawlers are willing to give up the right to crab.

It is an outrage to crabbers that trawlers are allowed a cooperative, which will allow them to fish all crab seasons. This is also an outrage to crabbers since the crab industry has fought long and hard for both limitation of vessels and some for of cooperative or ITQ. We have never been granted this privilege because the trawlers want a piece of our industry as well.

Lastly, it is an outrage that this process has circumvented the North Pacific Fishery Management Council (NPFMC) system and gone through congress with no input from other industries. Do crabbers matter that little to our own representatives? The NPFMC was put in place so that these situations would not occur. Instead, you have over ruled the recent Inshore-Offshore allocation decision, and created a huge mess which stretches well beyond the Bering Sea trawl industry. All S.1221 does is transfer the problem from the Bering Sea trawl industry to other sectors of the fishing industry such as crabbers.

It is ridiculous that the trawlers and major processors are able to have their way, grandfathering 39 trawlers in the crab industry, given the fact of their blatant disregard for the conservation of crab stocks in the Bering Sea.

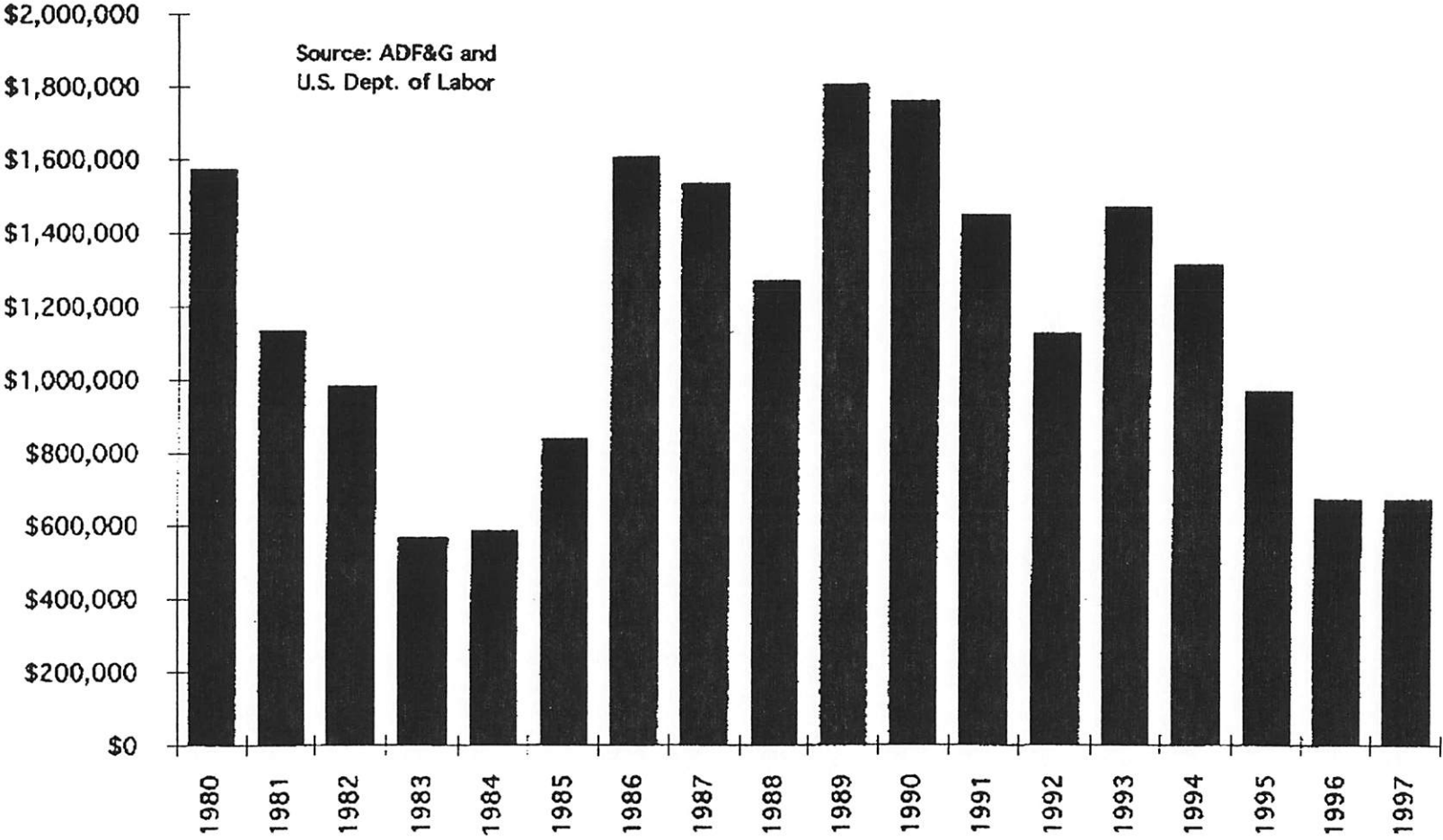
Sincerely,



Edward Poulsen
Kris Poulsen & Associates

cc: Rick Lauber, Chairman NPFMC
Frank Rue, Commissioner ADF&G

Average Crab Vessel Revenue Adjusted for Inflation



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SEP 29 1998
N.P.F.M.C

Date: September 24, 1998

To: Jeanne Bumpus, Justin Leblanc, Trevor McCabe and Bill Woolf

FROM: Arni Thomson, Executive Director *AT*

RE: SUBSTITUTE LANGUAGE, S. 1221, PROTECTION FOR BERING SEA ALEUTIAN ISLANDS CRAB FISHERIES

RATIONALE: The revised language in S. 1221 allows catcher vessels and catcher processors that fished in any crab fishery in 1997 to fish in all crab fisheries. Almost all the pollock vessels, estimated 39, that fished crab in 1997, only fished Bristol Bay king crab, while only 5 made a landing of opilio crab. The present language would grandfather all these boats into the opilio fishery, which is the basis for 75% of the crab fleet's annual revenue, similar to the economic significance of the pollock fishery to the Bering Sea trawl fleet. Pollock represents 70% of that fleet's revenue and S. 1221 provides special protection measures for them. Further, there are an estimated 3 pollock vessels that fished Bristol Bay king crab in 1997 under a moratorium qualification, however, they are not qualified for the crab LLP program. S. 1221, as worded, could grandfather them into the crab LLP, contrary to the intent of the NPFMC. We do not believe it was the intent of the protection language--in a bill fundamentally designed to reduce overcapacity--to create special measures to allow for expansion of these vessels in the extremely depressed and overcapitalized crab fisheries.

SECTION (b), p.22, September 23, 1998 Draft, S.1221

(b) CATCHER-VESSEL RESTRICTIONS

- (1) BERING SEA CRAB.—~~Catcher vessels listed~~ Any vessel subject to in section 204(a), (b), or (c) may not participate in directed fishing harvesting for any of a species of crab in the Bering Sea and Aleutian Islands Management Area unless such the-catcher vessel was used to catch harvest crab in a directed fishery for that species of crab in that the Bering Sea and Aleutian Islands Management Area during 1997- and is qualified under the applicable License Limitation Program to participate in directed harvesting of that species of crab in that Area.

Nothing in the preceding sentence or this Act shall preclude the North

landed at least 250,000 pounds of crab in '97,

Pacific Regional Fishery Management Council from recommending or the Secretary of Commerce from approving measures to prohibit ~~catcher-vessels listed in subject to~~ section 204 (a), (b), or (c) that were used to ~~catch-harvest~~ crab in a directed fishery for crab in ~~such the Bering Sea and Aleutian Islands Management Area~~ during 1997 from participating in directed fishing for crab in such Area.

Thank you for the opportunity to comment.

Comment of the Alaska Crab Coalition and Capacity Reduction and Buyback Group
on "Basic Elements of Agreement on S.1221 - 9/11/98"
September 16, 1998

The Alaska Crab Coalition ("ACC") and the Capacity Reduction and Buyback ("CRAB") Group provide this comment to staff of Senators Stevens, Gorton, Murray, and Murkowski on "Basic Elements of Agreement on S.1221 - 9/11/98" ("Elements").

The ACC is a nonprofit trade association representing owners of Bering Sea crab fishing vessels. The ACC strongly supports management measures for the improvement of conservation, safety, and economic conditions in the Bering Sea/Aleutian Islands ("BSAI") crab fisheries. Adoption of management measures that would provide these improvements through the reduction of excess harvesting capacity is an immediate priority of the ACC. The ACC strongly opposes any measure that would perpetuate existing excess capacity or lead to increased capacity in future.

An estimated 128 BSAI crab fishing vessels, including virtually all members of the ACC, qualify for participation in the groundfish fisheries under the License Limitation Program ("LLP"). These vessels are, as history has shown, especially well-suited for conversion to trawling. Consequently, the ACC has a direct interest in, and strongly supports, improved management of the groundfish fisheries.

The ACC works to ensure that all fishery management measures affecting its members are fair and equitable. This is always an important objective of the ACC, but is an especially high priority, when its members are confronted with serious economic challenges, as is now the case.

The CRAB Group is a nonprofit organization of owners of Bering Sea crab fishing vessels. The objective of the CRAB Group is the establishment of an industry-

funded buyback of licenses, in accordance with section 312 of the Magnuson-Stevens Fishery Conservation and Management Act ("Act"), for crab fisheries that are subject to the Fishery Management Plan for Commercial King and Tanner Crab Fisheries of the Bering Sea ("Crab FMP"). The CRAB Group supports management measures that facilitate, in a fair and equitable manner, the establishment of that capacity reduction program. The CRAB Group strongly opposes any measures that would frustrate efforts to achieve such a program.

The ACC and CRAB Group note that they were not invited to participate in closed-door meetings that led to the Elements. However, the ACC and CRAB Group did inform interested staff of concerns regarding those meetings and the agreement that emerged from them. The ACC and CRAB Group appreciate the willingness of staff to consider those concerns, and are grateful for the opportunity to provide this comment. The ACC and CRAB Group commend Members of Congress and staff for their efforts to achieve the goals of capacity reduction and Americanization.

The following points summarize the position of the ACC and CRAB Group on the Elements:

- The means by which Americanization and capacity reduction are pursued must be very carefully considered. Serious damage may be unnecessarily and unfairly inflicted on sectors of the industry that are not the primary objects of a particular Americanization and capacity reduction effort. This is true in the case of the proposal set forth in the Elements.
- The Bering Sea/Aleutian Islands crab fisheries suffer from massive harvesting overcapacity. Major stocks of BSAI crab are severely depressed, and at current levels of harvesting capacity, are extremely difficult to manage. Depressed resource conditions have resulted in complete closures of the important, red king crab fisheries. Guideline harvest levels (OYs) have been exceeded, due to overcapacity. Economic conditions in the BSAI crab fisheries have declined to historically low levels. Vessel revenues have dropped by more than 50% in the past several years.

Overcapacity also has contributed to safety problems; BSAI crab fishing is the most dangerous occupation in the United States.

- The proposal set forth in the Elements should be amended to ensure that the solution to overcapacity in the pollock fisheries does not seriously aggravate the problem of the BSAI crab fisheries. In particular, the proposal should provide that only those vessels with a demonstrated history of dependence on the BSAI fisheries should be permitted to participate. This would prevent latent capacity in the pollock fisheries from flooding into the BSAI crab fisheries, and would thereby ensure that already severe conservation, economic, and safety problems are not exacerbated. **Vessels principally dependent upon pollock (and other groundfish) should not be allowed to supplement their incomes by prosecuting crab fisheries that are the principal source of revenues for other vessels that are already operating in unsustainable, marginal economic conditions. An influx of these pollock vessels into the BSAI crab fisheries would lead directly to widespread financial failure among vessels in the dependent crab fishing fleet. Legislation that would both allow that influx and preclude the participation of otherwise qualified BSAI crab vessels in the pollock fisheries would inflict the worst possible damage on the crab fleet. *The ACC and the CRAB Group would not oppose precluding vessels that are dependent upon the BSAI crab fisheries from participating in the pollock fisheries, if at the same time, vessels that are dependent on the pollock fisheries were precluded from the BSAI crab fisheries, and if this were accomplished in a fair and reasonable manner.***
- **The ACC and CRAB Group understand that there is a proposal to allow any vessel that has one landing in the BSAI crab fisheries in 1997, alone, to remain eligible to continue to participate. This proposal would render the BSAI crab fisheries decidedly unsustainable, by establishing an estimated, permanent fleet size of 290 vessels. *The effect of this proposal would be to grandfather 36 pollock vessels that are not dependent on the BSAI crab fisheries, including 5 that are qualified under the moratorium, but not under the LLP.*** (Eight pollock trawlers would qualify for those fisheries under Proposed Action 5, Alternative 4.) These numbers are derived from State of Alaska Commercial Fisheries Entry Commission data, 1991-1998, and on the Analysis of the Proposed License Limitation Amendment Package ("Analysis"), dated August 21, 1998. See also attached letter from Pennoyer to Lauber, dated September 12, 1997, approving the LLP on the understanding that further capacity reduction measures will be taken (note reference to allocations by gear sector). A single landing in a single year does not demonstrate dependence, and does not permanently entitle a vessel to supplement its income from its primary fishery by participating in, and reducing average vessel revenues in, a fishery upon which other vessels depend for economic survival. Such an entitlement would, in the case of the BSAI fisheries, lead to financial failures among the participants who depend upon, and have, over the past decade, paid a very high price for, conservation efforts to restore the crab resources.

- The ACC and the CRAB Group understand that there is a proposal to allow only vessels with landings in 1997 in the pollock fisheries to continue to participate. This would preclude the participation in those fisheries of 128 otherwise qualified BSAI crab vessels. This result would be tolerable only if, at the same time, a fair and reasonable criterion were established for participation in the BSAI crab fisheries.
- The North Pacific Fishery Management Council has decided to address the overcapacity problem in the BSAI crab and groundfish fisheries. For the BSAI crab fisheries, the Council is considering analyses of eleven alternatives. The ACC and the CRAB Group support Proposed Action 5, Alternative 4, which would require at least one landing in any BSAI crab fishery in both of the years, 1996 and 1997, for continued participation under the LLP. **That requirement would fairly reflect dependence on the BSAI crab fisheries. One landing in a single year would not. The criterion in Proposed Action 5, Alternative 4, would prevent 120 non-dependent vessels—of any gear type—from causing financial ruin to BSAI crab vessels in the effort to supplement income from other fisheries.** A list of the ²⁴⁵ vessels remaining qualified for the BSAI crab fisheries under Proposed Action 5, Alternative 4, will be provided.

The critical need to preclude future participation of the 120 non-dependent vessels from the BSAI fisheries is readily illustrated. Had they fully participated, these highly capable vessels, based on the average vessel catch, could have harvested 47% of the total BSAI crab catch in 1995, 51% in 1996, and 47% in 1997. Based on the average ex vessel revenue, the 120 vessels could have displaced \$99,509,880 of the crab fleet's total revenue of \$209,800,000, in 1995. Similarly, for the years 1996 and 1997, these 120 vessels could have displaced \$66,102,480 and \$62,894,880 of the fleet's total revenue of \$128,900,000 and \$134,700,000, respectively.

Revenues to individual vessels have dramatically declined in the BSAI crab fisheries over the past several years. The average vessel revenues in 1989 were \$1.6 million. In each of the years, 1996 and 1997, those revenues were slightly above \$600,000. Thus, the 1995 to 1997 period represented an approximately 50% decline in average vessel revenue. *See Average Crab Vessel Revenue Adjusted for Inflation, attached.* Had the identified 120 vessels participated in the BSAI crab fisheries in 1995, 1996, and 1997, the average vessel revenues in those fisheries would have been reduced to \$562,466, \$364,124, and \$357,294, that is, by 32%, 34%, and 32%, respectively.

The foregoing analysis demonstrates that, were the latent capacity of the identified 120 vessels to become fully active, the impact upon the fleet that is dependent on BSAI crab would be extremely severe. In view of the fact that the financial condition of the currently active BSAI crab fleet has seriously deteriorated, is now marginal, and cannot be sustained, an influx of such latent capacity would lead to widespread business failures.

It is most notable that, since the Council voted to establish the LLP qualification dates on June 17, 1995, registrations for the major BSAI crab fisheries have dropped to a range of 196 to 253 vessels, very far below the 365 authorized by the LLP, and the 290 which would be authorized by the criterion of a single landing in 1997. *Moreover, analysis shows that using one landing in 1997 as the criterion for participation in the BSAI crab fisheries would increase the cost of the proposed license buyback from \$60 million, wholly funded by industry, to \$105.8 million, which would exceed the statutory limit and the industry could not afford.*

Another, important factor must be taken into account. In the groundfish fisheries upon which the 120 identified vessels depend, economic conditions, while difficult, have been far superior to those in the BSAI crab fisheries. Were the case otherwise, a large number of those vessels would have participated both regularly and recently in the BSAI crab fisheries. **The total BSAI groundfish trawl revenues in 1995 and 1996 were \$373,400,000 and \$332,500,000, respectively.¹ The BSAI trawl groundfish average ex vessel revenues in 1995 and 1996 were \$2,062,983 for 181 vessels and \$1,731,770 for 192 vessels, respectively.** With respect to the BSAI longline fleet, the corresponding total revenues were \$65,300,000 for 175 vessels and \$65,900,000 for 158 vessels and average ex vessel revenues were, \$373,142 for 175 vessels and \$417,088 for 158 vessels. *See Economic Status of the Groundfish Fisheries Off Alaska, 1996, Socioeconomic Task, November 21, 1997. (Note that the longline revenues apply to a fleet that is primarily comprised of small vessels that are dependent upon IFQs in the Gulf of Alaska ("GOA"), and large, shelterdecked, freezer longline vessels that are dependent on BSAI cod and turbot and BSAI and GOA IFQ fisheries. Very few, if any, of the small vessels, nor the great majority of the large vessels, would be suitable for fishing crab in the BSAI.)²*

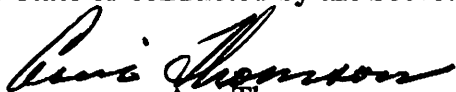
In addition, the fisheries upon which the 120 identified vessels depend do not face the severe conservation and safety problems confronting the BSAI crab fisheries. The groundfish fisheries are not depressed. Fishing crab, not groundfish, in the BSAI is the most dangerous occupation in the United States. *See Report, Centers for Disease Control and Prevention, National Institute for Occupational Safety and Health, Division of Safety Research, Alaska Field Station, November 4, 1997.*

¹ This decrease was not due to resource conditions, but was a consequence of the market.

² Thirteen additional, large vessels covered by Proposed Action 5, Alternative 4, are prohibited from participating in the fisheries of the United States, until September 30, 1998, by an annual appropriations Act of Congress, section 616, P.L. 105-100, and would be permanently prohibited by enactment of S.1221, the American Fisheries Act or enactment of the Senate version of the Commerce/Justice/State fiscal year 1999 appropriations measure, S.2260 (section 614(a)(1)), pending before the 105th Congress. *See Senate Report 105-235.* The House companion appropriations measure, H.R. 4276 (section 616(a)(2)), would continue the ban on these vessels for fiscal year 1999, and the ban would, of course, be subject to renewal by future appropriations measures.

- A detailed legal analysis, provided under separate cover, demonstrates that Proposed Action 5, Alternative 4, complies with the National Standards and limited entry provisions of the Magnuson-Stevens Act, an important consideration for Congress, which has only recently provided for reauthorization of that statute. **Legislative adoption of Proposed Action 5, Alternative 4, would thus be consistent with the existing policies and principles of fisheries management as provided by Congress in that Act.**
- The ACC and the CRAB Group note that \$20 million would be provided by the proposal set forth in the Elements to purchase vessels for U.S. Government uses. The circumstances of the BSAI crab fishery are at least as worthy of such support as are those of the pollock fishery. **Accordingly, the ACC and the CRAB Group request that \$20 million be appropriated to purchase BSAI crab vessels for U.S. Government uses. Equally in each case, reduction of excess capacity would be facilitated.**

In closing, the ACC and the CRAB Group reiterate their appreciation for the opportunity to comment on the Elements, and note their continuing, strong support of S.1221, the American Fisheries Act, as introduced. These organizations also support the provisions of S.2260 that would permanently bar from U.S. fisheries those vessels that have abandoned the U.S. flag to operate abroad. **However, a particular misinterpretation of S.2260 could lead to serious problems, and should be prevented. Accordingly, the ACC and the CRAB Group request a technical amendment to S.2260 that would expressly preclude fishery management councils and the Secretary from authorizing reentry of prohibited vessels into any fishery for which a buyback of licenses or vessels has been requested by an appropriate council or State or conducted by the Secretary.**


Arni Thomson
Executive Director
Alaska Crab Coalition


Gordon Blue
Coordinator
CRAB Group

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Royal Aleutian Seafoods, Inc.

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September 29, 1998

Richard B. Lauber, Chairman
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
Hand Delivered

RE: S. 1221

Dear Mr. Lauber,

Please accept this letter as Royal Aleutian Seafoods, Inc. ("RAS") brief comments regarding Senate Bill 1221. We are most disturbed with the Draft Legislation dated September 23, 1998, how it differs significantly from the original legislation. This letter is not intended to be a detailed analysis of S. 1221, given the "closed door" policy which with this legislation has been drafted. RAS has had limited opportunity to review this latest draft and reserves the right to further comment once proper analysis has been conducted.

As background, RAS is a 100% American owned seafood company that operates from a single processing location in Dutch Harbor, Alaska. RAS primarily engages in crab processing in the Bering Sea arena. It was with a passing interest to review S. 1221, only to discover that the crab business as well as all seafood sectors that do business in the Bering Sea will be dramatically impacted by its passage.

Originally, the S. 1221 was a legislative solution to reduce foreign ownership and rationalize the Bering Sea pollock fishery. The latest draft of S. 1221, while reduces Bering Sea participants, fails to Americanize the pollock fishery and includes provisions that will have sweeping changes to the North Pacific seafood industry. Further, the bill serves to benefit a few select shore-based companies to the detriment of others that are not currently engaged in pollock processing.

RAS is concerned with the following provisions:

- Establishes an exemption to anti-trust laws for certain processors.

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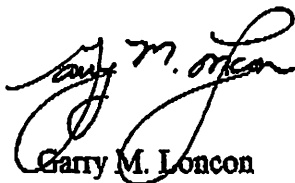
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- Allows the establishment of cooperatives that among other issues will result in a significant number of pollock vessels free to fish in the crab business that have little or no historical basis. The crab business is currently overcapitalized, which with the passage of S. 1221 will further worsen the economics of the crab business.
-
- Serves to strengthen control of U.S. fisheries by foreign interests.
- Eliminates the opportunities of American owned independent processors and harvesters.
- Transfers power, control and ultimately financial wealth to a few select beneficiaries of the bill.

In summary, S. 1221 circumvents the council process, public comment, and serves to benefit a few companies, while independent seafood companies and harvesters are disadvantaged. RAS is strongly against the passage of S. 1221 in its present form and welcomes the opportunity to thoroughly review to detail the far-reaching ramifications.

Sincerely,



Garry M. Loncon
CEO