

Agenda Item #5
Dec. 1977

NOV 14 1977

NOV 18 1977

Dear Mr. Okazaki:

This is to acknowledge the receipt of your telegram of October 23, 1977, and also your letter of October 21, 1977, expressing the concerns of the Japan North Pacific Longline-Gillnet Association about management measures proposed by the North Pacific Fishery Management Council for the Gulf of Alaska groundfish fishery.

The North Pacific Fishery Management Council has submitted its proposed plan for consideration and action. The plan is now under review by the Department of Commerce as required by the Fishery Conservation and Management Act of 1976. We will fully consider your comments and concerns in making our decision.

Sincerely,

Juanita M. Kreps

Mr. Y. Okazaki
Chairman
Japan North Pacific Longline-
Gillnet Association
Zenkeiren Bldg. 7-2 Chome Hirakawa
Chiyoda-ku, Tokyo, Japan

cc: Secy, U/Secy, DIB, D U/S, GC (w/copy of incoming), ExSec (2),
A, Ax2, F, Fx31, F31, F3 (2) (w/copy of incoming), NPFMC
(w/copy of incoming), FAK (w/copy of incoming), Sec Rep X

F31:NMFS:DLeedy:47454:n1:10/31/77

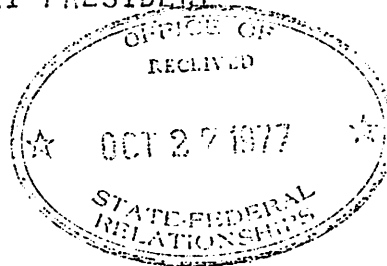
Rewritten:NOAA:TLeitzell:377-2977:jla:11/10/77

Control 172150 and Control 172131

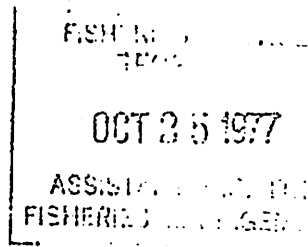
NPFMC

USDOC WSH
WU WSH
TLXA003 WAD073 (2117) (2-2146506296) PD 10/23/77 2117
ICS IPMIHA IISS
SUSPECTED DUPLICATE
IISS FM ITT 23 2117
PMS AVENUE NW WASHINGTON DC
AMQ329 VIA ITT JMB279 ATF754 LCB072
USWA CO JPTF 105
TOKYO 105/95 24 1031 PAGE 1/50
HONORABLE JUANITA KREPS SECRETARY OF
COMMERCE 14TH AND CONSTITUTION AVENUE NW
WASHINGTONDC-20320
DEAR MADAM SECRETARY THE MEMBERS OF JAPAN LONGLINE-GILLNET
ASSOCIATION RESPECTFULLY APPEAL TO YOU AS THE ULTIMATE AUTHORITY ON
MATTERS RELAYED TO THE FISHERY CONSERVATION AND MANAGEMENT ACT OF
1976 THAT IN YOUR REVIEW OF FMP AND PMP FOR
1978 FULL ACCOUNT BE TAKEN OF SEVERE SOCIO-ECONOMIC DISRUPTION WHICH
WILL RESULT TO OUR MEMBERSHIP IN THIS CONNECTION WE WISH TO CALL YOUR
ATTENTION TO OUR LETTER DATED OCTOBER 21ST SUBMITTED THROUGH
REPRESENTATIVE OF JAPAN FISHERY ASSOCIATION IN WASHINGTON DC
RESPECTFULLY YOURS Y OKAZAKI PRESIDENT

USDOC WSH
220A OCT 24 1977
WU WSH



October 21, 1977



Honorable Juanita Krepes
Secretary of United States Department of Commerce
Room 5851
14th Street and Constitution Avenue, N. W.
Washington, D. C. 20230

Dear Madam Secretary:

The North Pacific Regional Fisheries Management Council (NPFMC) very recently completed the Fishery Management Plan for the ground fisheries of Alaska. The management measures for sablefish in this plan seems unjustified under any reasonable interpretation of the intents and purposes of P. L. 94-265. If these regulations be approved as now written, the consequences to members of our association will be disastrous.

Our concerns were expressed in testimony at the public hearing of the NPFMC at Anchorage in late September. As a result of other testimony from the Alaskan constituency, council decisions were made which increased our concern. We followed-up by sending a delegation from Japan to Washington, D. C. for direct discussions and appeals to Mr. Carmen Blondin, National Marine Fisheries Service and Mr. John Negroponte of the State Department. The purpose of this letter is to appeal to you as the ultimate authority on matters related to the Fisheries Conservation and Management Act of 1976 to give us a fair hearing on the reasons we feel that the actions taken by the council are indefensible. The situation which concerns us is this:

In the 1977 PMP for the Gulf of Alaska groundfish the equilibrium yield (EY) for sablefish in the Gulf of Alaska was estimated as 22,000 Metric Tons. The optimum yield (OY) was set equal to EY (or 22,000 MT). In the 1978 FMP for the Gulf of Alaska groundfish EY was estimated to be in the range of 17,400 to 19,800 MT. Japanese scientists have estimated EY to be considerably higher than the above figures. As fishermen we have no recourse but to leave the arguments concerning the relative merits of the divergent estimates of EY to the scientists of our respective nations. We feel it reasonable, however, that in your review of the FMP, proper account be taken of the Japanese scientists' views.

As fishermen, considering the disparity in the estimates of EY and the fact that very little change has occurred in the condition of the stock in recent years, we have not seen convincing evidence that the TAC should be any less than the 22,000 MT of 1977.

The 1978 FMP further specifies that the OY for sablefish in the Gulf of Alaska will be set at 10,000 MT -- a 55 percent reduction from last year. Stock rebuilding, poor catches by some U. S. fishing vessels and the trend in catch per boat day are given as reasons for this drastic action. In our view, the arguments are not well documented and hardly justify the severe socio-economic disruption which will result in our membership.

Considering the current level of the Gulf of Alaska sablefish fishery the 55 percent reduction is totally unwarranted. Regarding the reports from U. S. fishermen of a scarcity of sablefish on traditional fishing grounds of southeastern Alaska, we have not seen any documentation of the number of boats concerned or their catch rates. According to our observer at the September council meeting the testimony regarding just a few vessels (two boat trips) had a decisive role in the council decision to reduce OY to 10,000 MT. It should be emphasized that fisheries data gathered for 14 years by the 22 longline vessels which account for more than 90 percent of sablefish catches in the Gulf of Alaska have provided United States (as well as Japanese) scientists with the best available source of information for stock assessment. You will note that the CPUE of this fleet increased in 1976.

We should like to point out that to ignore the abundance indicated by the CPUE of our vessels and to decide on the reduced OY on the basis of poor performance of two U. S. fishing vessel trips is grossly illogical.

The FMP notes the discrepancy in the catch per boat-day and catch per hachi. However, it has not established which of the two reflects more accurately the abundance of the stock.

When the FMP itself acknowledges the two to be irreconcilable at present, we fail to see how the catch per boat-day trend with no further analysis can be used as a basis to calculate an OY of 10,000 MT. In fact, documentation is lacking as to how an OY of 10,000 MT was calculated. There are those in our association who suspect that the OY analysis was developed from arbitrary expansion of certain selected arguments and was contrived primarily for the purpose of creating an unnecessary and insurmountable obstacle to the continued operation of the Japanese longline fishery.

We recognize that OY is an extremely complex concept which is not so easily definable. Very obviously, its definition can be far more arbitrary than other concepts associated with the condition of resources. This arbitrariness, we are afraid, may be excessive if the definition OY is entirely the prerogative of the local Regional Councils which understandably have very parochial interests. We hope that the OY should not be contrived simply to define an unjustifiably low surplus for foreign harvest.

The Japanese Longline and Gillnet Association was responsible for the development of the deep water sablefish fishery in the north Pacific ocean. We have made considerable investment in deep water explorations and fishing methodology. We have also made considerable investments in market development -- the apparent target outlet for the developing U. S. sablefish fishery. The association has a long history of cooperating with every fishery regulation proposed by the U. S. Government and voluntarily restricted our fishing effort to 22 vessels and depth greater than 500 meters to reduce the impact of Pacific halibut and juvenile sablefish. We made all of these voluntary sacrifices in the interest of conservation, even before P. L. 94-265 was enacted and in the face of increasing new entries into this fishery. As an Association we will continue to strongly support any necessary conservation recommendations and practises.

Although not to our benefit we can understand the necessity of displacing our longline vessels in the course of the orderly development of markets and fishing capacity of the U. S. industry. We consider it is unreasonable for the Regional Council to abuse the authority as empowered by the FCMA. We hope we are correct in our assumption that it is not the intent of your law to reduce foreign harvests by underestimating OY or overestimating U. S. Domestic Annual Harvest (DAH). In this regard we have serious doubts that the U. S. fishery will take 4,000 MT in the Gulf of Alaska in 1978. Needless to say then, we feel that the 3,000 MT reserve is also unnecessary.

We have one additional concern with the FMP for the Gulf of Alaska - The regulation which closes part of the Yakutat area and the entire southeastern Alaska area to foreign longline fishing all year. These areas have traditionally provided us with about 60 percent of our catches in the Gulf of Alaska. We wish to stress that our vessels have traditionally fished at depths greater than that usually fished by U. S. fishermen. We also fish during seasons (e. g. winter) when U. S. fishermen are inactive. We believe, therefore, that there can be little or no gear conflict. Therefore, there seems little justification for the area closure and foreign fishing should be allowed

October 21, 1977

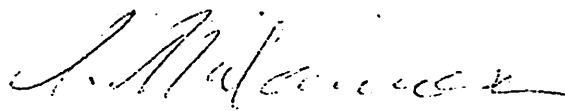
1. The retention of 22,000 MT as the allowable biological catch because the resource condition has not changes in recent years and certainly not worsened since last year. We request that foreign allocations be based on EY rather than the 10,000 MT OY which in our view is irrational and disastrous to the Association.

2. Since we cannot see that gear conflicts will be a serious issue, we request permission for our vessels to fish east of 141-00 W. To harvest that portion of the allowable catch which may not be taken by the U. S. fishery.

In addition, we should like to ask your review and consideration on the several other points which we have submitted to the esteemed office O NMFS including Pacific cod.

We request that action be taken to revise the pertinent wordings of Foreign Fishing Regulations (Sec's 611. 92 and 611. 93) of Fishery Conservation and Management Act. So as to enable the members of our association to legitimately receive allocations as well as to catch the species.

Your kind attention to our very serious problem will be very much appreciated.



For Y. Okazaki
Chairman

Japan North Pacific Longline-
Gillnet Association

Zenkeiren Bldg. 7-2 Chome Hirakawa
Chiyoda-ku, Tokyo, Japan

