North Pacific Fishery Management Council

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AGENDA ITEM #23
AUGUST 1978

August 18, 1978
MEMORANDUM

To : Council, Scientific and Statistical Committee, and Advisory Panel

From : Jim H. Branson
Executive Director

Subject: New pages for Bering Sea & Aleutian Islands Groundfish Fishery Management Plan.

The attached pages are the suggested replacement for Page 194 in the Fishery Management Plan for the Bering Sea and Aleutian Islands Groundfish Fishery.

The new pages provide for a longline sanctuary on both sides of the Aleutians between 172° West and 179° East. It also provides for a range of options or gear types in the winter halibut savings area in the Bering Sea.

Both of these requests will be made by the Japanese Longline Association and the Management Plan Development Team felt that it would be wise to have them in the plan so that they could be discussed during the public comment period.

Attachment

stocks and to develop fishing gear and fishing practices which will minimize or eliminate their incidental capture.

B. Trawl

(i) No trawling year-round in the "Bristol Bay Pot Sanctuary", (as described in Appendix III and Figure 27) *to prevent conflicts between foreign mobile gear and concentrations of U.S. crab pots; to prevent incidental catch of juvenile halibut which are known to concentrate in this area.*

(ii) No trawling from December 1 to May 31 in the "Winter Halibut-savings Areas" (as described in Appendix II and Figure 27) *to protect winter concentrations of juvenile halibut, to protect spawning concentrations of pollock and flounders.*

(iii) No trawling year-round in that part of the FCZ adjacent to the Aleutian Islands between 172°00'W and 179°00'E *to provide a sanctuary for foreign and domestic longline fishing in recognition of the situation in which highly developed trawl fisheries in both the Bering Sea and Gulf of Alaska have tended to preempt grounds from the traditional longline fishing method. In 1976, no Japanese Danish seiners, side trawlers, or pair trawlers operated in this area; less than one percent of the Japanese Bering Sea/Aleutian stern trawl effort occurred in this area; ___ percent of the Soviet trawl effort occurred in this area; and ___ percent of the Korean trawl effort occurred in this area. Therefore, no significant dislocation of the foreign trawl fishery is expected.*

C. Longline (Note: The following two options are extremes between which are several other options--e.g., shorter period, shallower isobath, fishing shallower than 500 m only when a U.S. observer is aboard to measure incidental halibut catch, etc.)

Option 1

1. "Winter Halibut-savings Areas" (as described in Appendix III and Figure 27):

   (i) December 1 - May 31--no longlining landward of the 500 m isobath.

   (ii) June 1 - November 30--no closures.

To prevent high incidental catch and mortality of juvenile halibut which are known to occur in winter concentrations in the "Winter Halibut-savings Areas".

2. Other areas--no closures.

Option 2

None (Note: if this option is chosen, Section 14.3.1.3.C dealing with domestic longlining will be changed to read "None".)

14.3.2.4 Gear restrictions

None

14.3.2.5 Statistical reporting requirements

As required by 1978 Foreign Fishing Regulations.

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Northwest and Alaska Fisheries Center
Division of Resource Assessment and
Conservation Engineering

August 17, 1978

TO : Dayton L. Alverson, Center Director, NWAFC, F11

THRU : Murray L. Hayes, Director, RACE Division, NWAFC, F111

FROM : Steve Hughes, Leader, Latent Resource Assessment, RACE, F111

SUBJECT: Summary of Results, 1978 Surf Clam Joint Venture

Final budgetary and logistic preparations for the 1978 joint industry-government Bering Sea surf clam research were completed in June. A $241,000 budget was adopted and contributed from the following participants: NMFS - $80,000; Alaska Department of Commerce - $60,000; North Pacific Fisheries Management Council - $20,000; and eight industry representatives - $81,000 (New England Fish Company, Seattle, WA; Snow Foods of Borden, Inc., Columbus, OH; Campbell Soup Company, Camden, NJ; Gortons of General Mills, Inc., Gloucester, MA; Peter Pan Seafoods, Seattle, WA; Dutch Harbor Seafoods, Redmond, WA; Pacific Seapro, Inc., Tacoma, WA; and Guilford Packing Company, Port Townsend, WA). As the above arrangements were being completed, the NPMC finalized a $107,000 contract with Tetra Tech of California for environmental impact studies.[1/]

The 102' chartered vessel Sea Hawk, equipped with a 6'-wide hydraulic clam harvester, departed Seattle June 20, 1978 and initiated operations in the Bering Sea July 3. NOAA R/V Oregon joined the Sea Hawk for a period of July 9-26. Tetra Tech's contracted environmental impact studies were conducted from the Oregon and completed from the Sea Hawk following the Oregon's departure. Field studies were completed August 9, 1978 with the Sea Hawk's departure from Port Moller to Seward where that 60-day charter period ended August 18, 1978.

The Sea Hawk and her crew provided an excellent research platform, and all planned studies were completed. A total of 488 hauls with the 6' clam harvester were completed. About 500 samples of clams were collected, prepared and shipped to Seattle for Paralytic Shellfish Poisoning (PSP) tests; and over 70,000 pounds of whole surf clams, 3,000 pounds of shucked surf clam meat and 1,100 pounds of whole tellin clams were

1/ In addition to the budgeted funds, ADF&G, RACE, URD, and various industry cooperators (especially Pete Harris and Egil Ellingson) provided services in kind.

frozen aboard the Sea Hawk and shipped to Seattle for industry evaluation of product quality. All of the above samples were tagged in compliance with FDA requirements and are currently being held in Seattle pending completion of PSP tests.

As you know, one of the primary objectives of this year's venture was for the Sea Hawk to conduct high, medium and low density fishing in three respective sites, thereby establishing production catch rates and providing harvest sites where environmental impacts could be determined from the Oregon.

Production fishing in these areas reflected catches of about 25 80-pound bushels of surf clams per hour (actual fishing time on the seabed). Tetra Tech chief scientist, Dr. Kauwling, indicated the environmental studies went well and that the inbenthic community is very limited in both quantity and species diversity. They completed 140 benthic grabs with a frame-mounted van Veen grab which retains a 3.0 sq.ft. substrate sample to a depth of 10 inches. From each grab sample, 16 individual core samples were collected for analysis and the remaining sediment washed through 2 mm screen to separate the macrofauna. In addition, they completed six benthic trawls for predator-food studies, 6-8 hours of video tape and completed clam re-burrowing studies.

The Sea Hawk also completed extensive exploratory and production fishing studies along the Alaska Peninsula between Port Moller and Ugashik Bay. Production rates established generally averaged about 25 bushels of surf clams per hour, with best fishing reaching 35.5 bushels per hour.

In general, the work progressed well, cooperation by all agencies and industry members was excellent, and more than adequate data base has been established to determine economic feasibility of the fishery and its initial management. I was personally somewhat disappointed in the production rates which seem possible. It appears to me that the Bering Sea surf clam does not form high density beds as the east coast species but tends to occur over large areas in a variety of substrates. Catches tend to be "trashy" with substantial quantities of dead shell and starfish. In some areas, rocks and gravel which clog the harvester also presented problems. While the surf clam resource is very large and extensive, development of a sound financial fishery will probably require use of twin 8-10' harvesters as employed in the east coast offshore fishery and mechanical sorters to separate surf clams from old shell and starfish.

List of Delegation Members to United States, August,1978

TOMOYOSHI KAMENAGA (leader)	President,Japan Fisheries Association Member, House of Councilors
YUSHIRO AMATATSU	Director, Japan Deep-Sea Trawlers Association Senior Managing Director, TAIYO FISHERY CO,.LTD.
SHINJI ENDO	President, National Federation of Medium Trawlers'
YOSHIRO OKAZAKI	President,North Pacific Longline-Gillnet Association
EITARO ATSUMI	Representative, Japanese Tanner Crab Fishing Industry Vice President, NIPPON SUISAN KAISHA,LTD.
GISUKE TAKAI	Representative, Northern Sea Salmon Mothership Owners Council Senior Managing Director, NICHIRO GYOGYO KAISHA,LTD.
KAMEJU TSUDA	President, Federation of Japan Salmon Fisheries Cooperatives
SHIGEYOSHI MONMA	Vice President, National Federation of Salmon Drift-net Fishery Cooperatives
MINORU MORIMOTO	International Division, Oceanic Fishery Department, Fishery Agency of Japan

CONTENTS

Address by Delegation Leader, Mr. Tomoyoshi Kamenaga, President, Japan Fisheries Association

First of all, let me express our heartfelt gratitude for your kindness of sparing much of your precious time to meet us mission members.

As we informed you previously, our mission consists of the representatives of various Japanese fishery bodies engaged in fishing operations within the FCZ of your country. Before expressing our opinions and desires, we would very much like to offer our thanks to you for the many kindnesses your authorities concerned have shown to Japanese fishery circles to date.

In fact, we have long been engaged in fishing in waters off the coast of your country, and during our fishing operation we have often come across various accidents - shipwrecks due to rough seas and injury and illness of our fishermen.

On such occasions, your Coast Guards have been very kind and friendly towards our fishermen. They immediately came to rescue and transported our injured or sick fishermen for appropriate medical treatments. For such kind acts on your side, all of us Japanese fishing circles wish to express our heartfelt respect and gratitude to you.

About one and a half years have already passed since year fishery administration started in March, 1977 under the FCMA. During this period we Japanese fishery circles often expressed our opinions on your fishery control

measures through missions dispatched and also in writing. These opinions were studied by your RCs in some cases and by your government agencies in others. As a result, various favorable measures were taken by your government regarding the by-catch of cods by Japanese North Pacific longline-gillnet fishermen in waters less than 500 meters deep in the Gulf of Alaska and the easing of fishing zone restrictions for our tanner crab fishing. Also, US-Japan joint surveys were conducted in the Atlantic waters regarding squid catch to clarify the conditions of fishery resources and new information for the improvement of various restrictive measures has been obtained.

Further in early June the Magnuson Bill passed the Senate to revise part of the 1976 FCMA. The purpose of the Bill is to regulate the joint enterprises regarding at-sea purchase of marine products and at the same time to consider restrictions on fishing quotas within the FCZ to be allocated to the countries now restricting the import of U.S. marine products.

We Japanese fishery circles, along with our government, submitted our comment on the Bill and also on the actual state of the import restrictions of our country. We heard that our comment was favorably studied at the U.S. Congress and by government authorities concerned, and in fact, in the Aucoin Bill adopted by the House of Representatives in mid-July, the provision concerning import restrictions by foreign countries was practically deleted. In this regard, we feel highly grateful for your favorable consideration, and sincerely hope that your future legal adjustments to be done between the Senate and the House of Representatives will be made along the line of the Bill adopted by

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the latter.

Let me say some words about the purpose for which we are here today. We are told that PMP and FMP on various types of fishing operations are currently under urgent preparation at your RCs and various government agencies concerned, and that your government is to shortly start negotiating with the governments of foreign countries on catch quotas on the basis of such PMP and FMP. Needless to say, we Japanese fishery circles are deeply concerned about the result of such intergovernmental negotiations, and, prior to the negotiations, we earnestly wish to express our opinions and desires so that your authorities concerned may take them into consideration in preparing PMP and FMP. We also wish on this occasion that fish quotas for our country will be determined at the time of the negotiation in full consideration of the real state of our fishing industry.

Each and every member of our mission has his own concrete desires or opinions for your kind consideration. These desires and opinions will be expressed after I tell you about the following matters which all of us consider to be most important:

1. Two joint enterprises on buying-at-sea of fish caught by U.S. fishermen, were approved by your government in the early part of June this year. One of these enterprises is with the Republic of Korea and concerns the catch of Alaska pollacks. In view of the demand for this fish in Japan, we are very much afraid that our quota for the fish will be decreased as the operation of such joint

enterprises expand.

Under such circumstances, we solicit your favorable consideration so that our quota for Alaska pollack next year may not be affected adversely by the activities of such enterprises.

If and when your fishing industries wish to develop new fishery resources including Alaska pollacks jointly with Japan, we will positively consider to go along your line as far as the situation permits. Your kind attention in this regard will be appreciated.

2. Regarding the deep-sea fishing in the Bering Sea, we wish that appropriate quota for Japan next year will be determined on the basis of the results of the U.S.-Japan Scientists' Conference held in Seattle in May this year, without setting OY arbitrarily at an inadequately low level. Since Japanese scientists say that the Alaska pollack resources are in very good conditions and that ABC should be increased to 1.20 million tons, we should be most grateful if you could kindly give your favorable consideration in determining an increase in the quota to Japan.

3. Thirdly, our request for an increase in the quotas for cods in the Gulf of Alaska was approved at the meeting of NPFMC held in December last year. Although this quota is to be put into practice when FMP in the Gulf of Alaska is made public, we have not received an additional quota as yet. In this

regard, we earnestly hope that you will kindly consider to realize publication of FMP and re-allocation of the quota to Japan as soon as possible and increase our present quota of 6,200 tons to 10,000 tons.

4. Regarding the tanner crab fishery in the Bering Sea, we are grateful for the fact that the June meeting of NPFMC adopted a resolution favorable us and that the Department of Commerce promptly revised the related regulations, with the result that the fishing area for Japan has been expanded. This is indeed a matter for rejoicing for Japanese tanner crab fishery that has suffered from too rigid limitation since March this year.

   If and when the regulations based on this year's FMP, which were already approved by your Secretary of Commerce, come into force, Japanese fishing vessels will have to be driven into the waters north of 58°N, which are poor fishing grounds. Accordingly, we hope earnestly that the regulation based on revised FMP will be valid until our operation of this season finish.

   Furthermore, C. bairdi caught in the fishing grounds which have been expanded this time should be returned into the sea, under the regulations. As Japanese and the U.S. scientists agree, the tanner crab resources are tremendous and have not been fully utilized as yet.

We strongly desire in this connection that, from the standpoint of fuller utilization of fishery resources, efficient operation and various meteorological conditions, FMPs for this year and the next will be so determined that the waters south of 58°N and west of 171°W may be open for fishing of C. bairdi not yet fully utilized to date.

Additionally we would mention that such an expansion of fishing zones will not cause fishing competitions between U.S. and Japan at all.

5. Although salmon ~~and trout~~ fishing is still restricted by The International Convention for the High Sea Fisheries of the North Pacific Ocean, we are pleased to note that we are now permitted to operate in a part of the 200-mile waters along the Aleutian Islands as a result of the revision this year of the above convention. We are indeed grateful for your kind understanding in this regard, and yet we firmly believe that designation of the zone west of 178°E, out of the restricted area south of 56°N, as fishing zone, will hardly affect the U.S. fishing since migration of salmon ~~and trout~~ of U.S. origin into this zone is almost negligible.

We are told that the United States is also conducting surveys on the ~~mixing~~ intermingling of U.S.- and Asia-origin salmon and trout in this zone, and therefore earnestly hope that you will give special consideration to alter the appropriate restrictive fishing lines on the basis of the data and information newly obtained through such surveys.

6. Lastly let me refer to the problem of our tuna longline-~~gillnet~~ fishery.

Properly speaking, such highly-migratory fishes as tuna, billfish and sharks should be controlled by international organizations, and Japan as well as the United States participates in related international bodies in an effort to control these resources appropriately.

But we are told that your country started to enforce fishing regulations in April this year in regard to the billfish and sharks in the Atlantic Ocean, and is shortly to impose similar restrictions also on the fishing of same species in the Pacific. Accordingly, our tuna longline fishing boats will have to obtain your fishing permission and comply with your regulations in order to operate within your FCZ. We are impressed, however, that the contents of these regulations are highly unrealistic. For instance, even though Japanese fishery circles agreed spontaneously not to catch a billfish or shark in the Atlantic under consideration about the concern of your sports fishermen and have informed your authorities concerned about this, our fishing boats are requested under the regulations to pay fishing fees, to have your observers get on board at our own expense and to give prior notice to your officials when going in, and out of, your 200-mile zones.

Such being the situation, we earnestly desire that basically your country will respect the international

principle that, as stipulated in FCMA, control of such highly-migratory fishes as tuna, billfish and shark should be conducted as before according to the agreement reached under the international control system.

With regard to the regulations on billfish and shark which were already made public, we sincerely hope that you will closely study possible damage such regulations may inflict on our tuna longline fishery and exercise your administrations so that the restrictions may be released within a minimum limit.

Thank you for your listening.

The Japan Deep-sea Trawlers Association

The U.S. fishing area where our trawlers operate is divided into three zones. Therefore, we express our opinions and advance requests on each of them.

Pacific Coast

1. Bering/Aleutian Area

Regarding the fishery resources of this sea area in 1979, Japanese scientists submitted the following analysis to the U.S.-Japan Scientists' Conference which was held in Seatle in May of this year:

	A.B.C., 1979	A.B.C. 1978
Alaska Pollack	1,200,000 ton	1,100,000 ton
Yellowfin Sole	106,000	106,000
Other Flounders	139,000	139,000
Cod	70,000	58,000
Pacific Ocean Perch		
Bering	21,000	6,500
Aleutian	46,000	15,000
Squid	10,000	10,000
Herring	21,000	18,700

As is apparent from the above table and generally speaking, the conditions of fishery resources in 1979 are good. Especially with respect to those fishes whose resource condition is good, such as Alaska Pollack and Pacific Ocean Perch, we wish that such state of resources will be taken into consideration in deciding the catch quotas to foreign fisheries for 1979 and request that the quota for Japan be increased.

2. Gulf of Alaska

Regarding the Gulf of Alaska, the catch quotas to foreign fishing as well as various regulations have been enforced, like in the other sea areas, on the basis of PMP. We have recently learned, however, that in the near future this method will be so changed as to be based on FMP. According to FMP, the catch quotas allocated to foreign countries during six months, including months January through May and December, should be 25% max., and during these months the pelagic gears must be used. The catch quota for each species is controlled by dividing the fishing grounds into five small fishing zones. Thus, the fisheries there are so rigidly controlled that such regulations become highly unrealistic and do not reflect the actual conditions of fishery at all. We have already presented our comment on this through our Government. Setting-up of quota for each species of fish in the Gulf of Alaska, having a widely migrating characteristic, in each small zone is quite meaningless.

FMP for the Gulf of Alaska has some disregard of actual conditions of the fishery in many points. We, therefore, request improvements on such FMP.

3. Joint venture with Foreign Processing Vessels

Your government has approved this year two buying-at-sea joint ventures which use both Russian and ROK processing vessels. We request that the quota to Japan be not cut down in future on account of the promotion and expansion of such joint ventures. The bottom-fish fishery in the Bering and Aleutian waters

and in the Gulf of Alaska has been established finally as an enterprise at a great sacrifice including shipwrecks and loss of many human lives. Therefore, the weight of this fishery in the Japanese fishing industry is very large. Cut in catch quota will inevitably bring about the loss of employment for a large number of fishermen and workers dependent upon this fishery and also an economic confusion in the fishing industry in Japan, which in turn will cause social problems. If your fishermen wish to make a joint effort with us for the development of fisheries untapped as yet, we are ready to cooperate with them as far as circumstances surrounding us permit, and wish to make a study of your proposal after obtaining your country's opinion.

Atlantic Coast

1. 1979 Catch Quotas of target species for Japan

1) Squid

Japan has traditionally developed this fishery resource, especially illex. Therefore, we are proud of our traditional fishing record testifying to our untiring effort for the effective use of squid stocks, which were formerly untapped by any others.

Furthermore, Japanese fishing boats have observed U.S. foreign fishing regulations in regard to squid and positively cooperated in the fishing controls and the conservation and management of squid stocks. Therefore, it runs counter to the spirit of the United States Fishery Conservation and Management Act and the Japan-United States Fishery Agreement to reduce the

quota for Japan in disregard of such historical facts and consequently, to give large quotas to those countries which have no traditional fishing records.

Moreover, concerning the quota for the United States itself, and in comparison with such fact in the United States fishing industry as that the maximum catch of squid by American fishermen in the past was about 4,000 tons, the DAH quota of 36,500 tons for 1978 cannot help being termed a hardly understandable quantity.

Therefore, the quantity beyond the catching capacity of American fishermen should be preferentially allotted to the countries with traditional fishing records.

Also in accordance with Squid FMP Draft (Draft Environmental Impact Statement/FMP for the Squid Fishery of the Northwest Atlantic Ocean, July, 1978):

	MSY	OY	U.S. Capacity	TALFF
Illex (M.T.)	40,000	30,000	10,000	20,000
Loligo(M.T.)	44,000	44,000	14,000	30,000

Therefore, the quantity beyond the catching capacity of American fishermen should be preferentially allotted to the countries with traditional fishing records.

This shows that safety factor of 25% is used for setting OY of Illex to reduce it to 30,000 metric tons. This safety factor of 25%, however, has no scientific ground at all. We cannot, therefore, agree with arbitrarily set OY of 30,000 metric tons, and request that OY for Illex for 1979 be restored at the same level as MSY for the same year.

2) Butterfish

The life span of this fish species is short, and its biomass is estimated at 60,000 - 90,000 tons according to the U.S. Survey Report (DF ICNAF, Research Document 74/75). Therefore, the United States should set OY commensurate with this biomass.

The following table for butterfish was presented at the meeting of Mid-Atlantic RC on July 12:

	OY	U.S. Capacity	TALEF
1978 PMP	18,000 M/T	14,000 M/T	4,000 M/T
1979 Draft FMP	16,000	6,000	10,000
Advisory Subpanel Recommendation	10,000	6,000	4,000

The fixing of OY at an extremely low 16,000 M/T in the 1979 Draft FMP has no biological and scientific grounds whatsoever and conflicts with the spirit of the U.S. policy for effective utilization of resources.

Furthermore, it is a matter for deep regret that the Advisory Subpanel Recommendation lowered the recommended OY from 16,000 to only 10,000 tons. We believe that the United States should restore the OY at least to the level of 1979 Draft FMP in consideration of the above table.

2. Reallocation Requested for 1978

(1) Quota increase of target species

Japan's quotas for 1978 stand at 2,357 tons for illex, 2,950 tons for loligo and 622 tons for butterfish. These are in utter disregard of Japan's traditional fishing records.

Therefore, we urgently demand that reallocation be made to give Japan the following quotas in full consideration of Japan's annual fishing records in the past:

Illex	5,000 tons
Loligo	5,000 tons
Butterfish	5,000 tons

With respect to the proposal for the reallocation of 5,500 tons of illex to Japan and other countries, which was put forward at the Gear Conflict Consultative Meeting in Baltimore on July 11, we should like to request special consideration with due regard to the above-mentioned figures.

(2) Increase in Small Quota for Incidentally Caught Fish

The reason we are calling for an increase in the small quotas is that there is the great possibility of such fishes as red hake, silver hake and mackerel incidentally entering nets according to changes in the sea condition, and that this possibility constitutes a constant source of worry during operations to catch target fish. It is already well known that this also causes the catch to fall short of the level which can otherwise be achieved.

Since this is considered to run counter to the principle of effective use of fishery resources, it is to be requested that the quotas be set at the following reasonable levels:

Silver hake	over 100 tons
Red hake	over 50 tons
Mackerel	over 200 tons

3. Relaxing of the U.S. Foreign Fishery Regulations

(1) Abolition of 100 - 200 F. Depth Restriction
As has been consistently insisted by our country in the past, we hereby request again that 100 - 200 F. Depth Restriction be abolished.

(2) Revision of Window Concept
We should like to express our gratitude for your country's clear-cut reply to the effect that off-the-bottom gear will be treated in the same way as pelagic trawl gear, which was received at the Gear Conflict Consultative Meeting in regard to the definition of off-the-bottom gear. Nevertheless, we also wish to request that the period from June 15 through September 15 should be declared open in Squid Area 3.

National Federation of Medium Trawlers

Our industry of land-based dragnet fisheries is composed of medium trawlers of a gross tonnage less than 350 tons and, under the guidance of the Japanese government, has been making efforts for the maintenance and rigorous execution of the operation order in the fishing grounds in the central and west regions of the North Pacific Ocean. We do not rely for fishing at all on the waters neighboring the U.S. proper, e.g. Gulf of Alaska and conduct fishing operation in the waters further west of these sea areas. That is, we are convinced that there is nothing noteworthy that we do and which may effect directly, or impede in, the conservation of fishery resources. We, smaller fishermen, who have been living by fishery for many years, and who also wish to live by fishing in years ahead, recognize the necessity for observing the foreign fishing regulations of the U.S., set along with the newly established order of the sea and will do our best to utilize the catch quota allocated to us under the rational fishery management.

We hereby advance the request that the catch quota for us be rationally increased as far as possible. For this purpose, "other flounders" may be considered, fortunately, to be in a stable resource condition.

In the U.S.-Japan scientists conference held in May of this year, Japanese scientists stated that such deepwater flounders as Greenland Turbot and Arrowtooth Sole were under estimated in their resource evaluation because of inability of making a survey on the spot as deep as where the said fishes actually live. A request is therefore

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advanced that sufficient consideration be given for a possible increase of quota at the time of determining the catch quota of "other flunders". It is well understood by you that the fishing boats belonging to our federation fully cooperated in taking the observers on board the ship when they made a on-spot survey, as we regard the management of fishery resources very highly.

We, heretofore, have explained about the actual situation of our fishery. We wish to state, at the same time, on our requests in concrete terms as follows:

1. Catch quota
   Other flounders (Greenland Turbot, Arrowtooth Sole, Rock Sole, Flathead Sole) and Alaska Pollack should be increased in quota.
2. Incidental Catch of Shrimp
   A incidental catch is unavoidable from the nature of the dragnet trawl fishery. A request is advanced, therefore, that incidental catch of Shrimp be allowed.
3. Change in the regulations
   (1) It is requested that in all Aleutian waters, operation within 3 to 12 miles from the coast be allowed.
   (2) According to the present regulations, the fishing period in Aleutian area (2) (178°30'W ~ 176°W) is set for July 1st through October 31st. It is requested that such period be changed to May 1st through August 31st for the improvement of fish catch efficiency.
   (3) According to the present regulations, the operation period in Aleutian area (1) (170°E ~ 178°30'W) and (5) (170°E ~ 176°W) is set for May 1st through

December 31. It is requested that such period be changed to March 1st through October 31st.

4. A demand is hereby made of U.S. charts showing 3- and 12-mile waters along the coasts of Aleutian Islands.

North Pacific Longline-Gillnet Association

The membership of the North Pacific Longline-Gillnet Association has been and is limited to only 22 vessels over the past fifteen years, with long and rich experiences. Ours comprises a very small segment of the fishing industry of Japan, having received 1.5% of the national allocation of TALFF for 1978. However, we take pride in keeping orderly operations of directed fisheries of Sablefish (Blackcod) and Pacific Cod in the Northeastern Pacific, authorized by the U.S. authorities and under the administrative guidance of the Japanese government.

Our position has been expressed in the Comments dated June 5, 1978[1/], which was submitted to the Department of Commerce and the North Pacific Fishery Management Council in time for the termination of the public comment period of the proposed FMP for the Gulf of Alaska Groundfish and the Regulations implementing the plan publicized on April 21, 1978.

Our primary concerns at this writing are:

A. When will the FMP and Regulations be implemented?

B. What will be the contents of FMP and Regulations after revisions?

C. Would there be enough time allowed for thorough dissemination of the finalized FMP and Regulations among the crews who are likely to be in distant oceans at such time?

1/ Letter to Mr. Terry L. Leitzell, Assistant Administrator for Fisheries, NOAA, dated June 5, 1978.

North Pacific Longline-Gillnet Association

The membership of the North Pacific Longline-Gillnet Association has been and is limited to only 22 vessels over the past fifteen years, with long and rich experiences. Ours comprises a very small segment of the fishing industry of Japan, having received 1.5% of the national allocation of TALFF for 1978. However, we take pride in keeping orderly operations of directed fisheries of Sablefish (Blackcod) and Pacific Cod in the Northeastern Pacific, authorized by the U.S. authorities and under the administrative guidance of the Japanese government.

Our position has been expressed in the Comments dated June 5, 1978[1], which was submitted to the Department of Commerce and the North Pacific Fishery Management Council in time for the termination of the public comment period of the proposed FMP for the Gulf of Alaska Groundfish and the Regulations implementing the plan publicized on April 21, 1978.

Our primary concerns at this writing are:

A. When will the FMP and Regulations be implemented?

B. What will be the contents of FMP and Regulations after revisions?

C. Would there be enough time allowed for thorough dissemination of the finalized FMP and Regulations among the crews who are likely to be in distant oceans at such time?

1/ Letter to Mr. Terry L. Leitzell, Assistant Administrator for Fisheries, NOAA, dated June 5, 1978.

D. Contents and expected schedule for the implementation of FMP for Groundfish of the Bering Sea and the Aleutians.

Since we do not have adequate information regarding the above, we have hereunder delineated our comments and problems on the FMP of the Gulf of Alaska and on PMP for other areas.

Concerning TALFF, Quota, Target Species. We should like first of all to express our sincere gratitude for the kind and understanding action taken by officials of the Department of Commerce and the members of the NPFMC Council who permitted us to fish Pacific Cod in the area west of 157°W. longitude and landward of 500 m. isobath, under the amendment to the Foreign Fishing Regulations which came into force on April 10, 1978. We understand the action was taken to offset or mitigate the drastic cutbacks in the sablefish quota in the Gulf of Alaska this year. However, the members of the Association are beginning to become anxious because of the delay in realizing the Recommendation adopted by the Council at its 14th meeting regarding the increase in Pacific Cod quotas, as well as about the request made to the same effect by the Japan Fisheries Agency. We should, therefore, like to request that in such measures to relieve the serious damage we suffered as a result of cutbacks of Sablefish quota be included the following, for the remainder of 1978 and for 1979 operations:

A. It is desirable that such relief measure be considered over the entire area of our operation, not limited to the Gulf or Bering Sea, nor to the Aleutians alone.

B. Longline operations are advantageous to conservation of the fish resources because of the passive nature of the fishing method, such as sinking and setting of the lines.

C. This method enables the fishermen to avoid gear conflict with U.S. fishermen, as well as minimizing the impact on halibut resources.

When formulating the fishery management regime, we sincerely hope the foregoing will be taken into consideration as a merit of longlining.

Next, we would like to deal with specific problems.

1. Sablefish Quota in the Gulf of Alaska

(A) For the 1979 fishing year, we earnestly request that no less than 8,000 m.t. of Sablefish be made available to the Japanese longliners.

(B) For Sablefish longlining in the area east of 140°W. longitude in the Gulf of Alaska, we request that any shortfalls of DAH and reserves, if any, be reallocated to Japanese longliners at the time when no gear conflict takes place with U.S. fishermen.

The reason for the above request is that Sablefish is the most important target species of the Japanese longliners, and this area happens to be the richest and most valuable fishing ground of Sablefish.

2. Release of Reserves and Reallocation of DAH for other Species.

For all other species, we request that the earliest possible release and/or reallocation to FAC and, further, to national allocation of Japan, be executed by early and frequent reassessment of the progress of U.S. catches.

Reason for the above request: From the viewpoint of achieving full utilization of the resources and from the operational perspective to ensure smooth and effective operations, the earliest possible release of its surplus to FAC would be appreciated.

3. Directed Pacific Cod Longlining in the Gulf of Alaska.

(A) While we are extremely appreciative of the support by NPFMC and the amendment of PMP on April 10, 1978, whereby Directed Pacific Cod Longlining has been authorized, we would request the permission of the U.S. authorities for this fishery in that portion of the waters between 157°W. longitude and 140°W. longitude, landward of 500 m. isobath as well.

(B) In close relevance to the above, we request the quota of Pacific Cod be set at 10,000 m.t. for 1979 for the Japanese longliners.

Reasons: As the gear conflict is said to be the cause behind the closure of this area east of 157°W. Long. and west of 140°W. long. (landward of 500 m. isobath), we believe making a distinction between the U.S. and Japanese fishing seasons would eliminate the factor and help achieve the objectives of full utilization of the resources.

4. Open/Closed Areas

(A) Although Davidson Bank (163°00'W. - 166°00'W.) has been opened to foreign longlining under the amendment to PMP on January 18, 1978, the proposed FMP for the Groundfish of the Gulf of Alaska closed the area to all foreign fishing. Accordingly, we would most earnestly hope that Davidson Bank will remain open to foreign longliners.

Reasons:

1) While the fishing method of longlining is generally recognized as the best suited method for conservation of the resources, the continued opening of Davidson Bank to foreign longlining should not significantly affect the development of the U.S. Fishing Industry.
2) In addition to the recently closed large and most valuable area of the Southeastern east of 140°W. Long., the proposed closure of Davidson Bank would inevitably result in serious difficulty in operation of longlining which requires a large space.

(B) We request that Sablefish longline fishing by us be allowed during the off-season of U.S. longline vessels in that portion of the Gulf of Alaska east of 140°W. Long., currently closed to foreign fishing.

(C) As for opening of the proposed closure of the corridor between 169°W. - 170°W. Long., and between 3-12 miles from the base line used to measure the territorial waters, we would merely reiterate our previous request that we may continue to operate in this area as has been permitted under current PMP, for the very location in

the Gulf involves little gear conflict, and moreover the recent Recommendation by NPFMC opens this area only to longliners.

(D) We would request that 20% (100 m.) allowance be granted for 500 m. depth restriction for directed fishery of Sablefish in the Gulf of Alaska, taking into account the characteristics of longlining which set the line along the steep slope of the continental shelf. We are convinced that the recognition of allowance would not impose any serious impact on the halibut stocks nor would it cause any conflict with the U.S. fishing vessels.

Reasons: Setting of longline gear is done by echo-sounding and considering, at the same time, such other factors as currents, upwellings, etc. Thus, it is extremely difficult for longline operations to set the lines exactly along the depth contour, particularly in cases where most of Sablefish longlining is conducted along the slope of the outer edge of the continental shelf with complex ups and downs as well as curves.

5. Statistical Areas.

No. 8.3.2.1.(A) of the FMP divides the Gulf of Alaska into five separate statistical areas, among which the FAC for all species has been apportioned. We have no objection to application of this for statistical purposes. We even commend the works of scientists who have formulated such effective methods; however, there is no biological evidence; the populations of neither Sablefish nor Pacific cod are so clearly separated into such statistical areas. In other words, in management of fisheries, when a statistical area division is applied, we face serious operational difficulties. We would, therefore, suggest to the extent the

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5. Statistical Areas.

No. 8.3.2.1.(A) of the TMP divides the Gulf of Alaska into five separate statistical areas, among which the TAC for all species has been apportioned. We have no objection to application of this for statistical purposes. We even commend the works of scientists who have formulated such effective methods; however, there is no biological evidence; the populations of neither sablefish nor Pacific cod are so clearly separated into such statistical areas. In other words, in management of fisheries, when a statistical area division is applied, we face serious operational difficulties. We would, therefore, suggest to the extent the

statistical division is necessary, the number of areas be kept at a minimum. And we further with to suggest that 10% allowance be given to counting of catches when the operations are conducted between such areas.

6. Time/Percent of Catch Restrictions.

Under this topic, we only with to draw your attention to the fact that the recent meeting of NPFMC endorsed the exemption of longliners from application of such restriction so that we will be an exception to application of this provision when implemented.

7. Increase in Quotas for Target Species of Longliners in the Bering Sea and the Aleutians, i.e., Sablefish, Pacific Cod and Flounder.

We ask your full consideration on this item for another possible compensatory measure for our drastic loss in the Gulf of Alaska Sablefish quota.

8. Revision in current Bering Sea closure to Gillnet Herring Fishery.

It is desired that the present closed area (North of 58°N., east of 168°W.) be altered to an area encircled by the 168° longitude, the line connecting the points 60°N. - 168°W., the 58°N. latitude and the coastal line.

Reasons: Longline-gillnetting vessels have long been conducting herring gillnetting in the Bering Sea for rather short two-month periods in May and June. However, the effective herring catch is extremely difficult in the area seaward of the current closed area, west of 168°W. Long., because the populations of herring are relatively dispersed.

As the proposed opening is of partial nature, this will not affect the herring catch by the U.S. coastal fishermen.

Tanner Crab Fishing Industry

With respect to the operation of the Japanese mothership-type crab fishery in 1979, we request that in the sea area south of 58°N, the region west of Long. 171°W. be opened for our fishing operation including C. Bairdi.

(Reason)

1. As is seen from the result of fishing operation in 1978, the fishing ground in which a commercial catch can be realized north of 58°N, is restricted to a very narrow range. This fact not only makes a mothership-type fishery there extremely difficult, but also requires increasingly large fishing efforts for this fishing ground and, as a result, the fishery resources within a specific sea area only are heavily exploited. On the other hand, in the sea area south of 58°N a tremendous tanner crab resource will be left unutilized. According to FMP of 1978, M.S.Y. of C.opilio is 102,000 metric tons, while its D.A.H. is only 10,000 metric tons.

   We consider that a full use of such unutilized resources agrees with the benefits of both Japanese and U.S. fishermen.

2. In the sea area west of Long. 171°W. it is anticipated that there will be no fishing gear conflicts occurring between Japanese and U.S. vessels. We learn that in 1978 only one U.S. fishing boat carried out fishing in the waters west of Long. 171°W.

3. On C. bairdi

(a) The present catch of C. bairdi is presumed to be at a level far below that of the allowable catch. Furthermore, C. bairdi living in the waters west of Long. 171°W. are greatly different in size and distribution density from those living in the waters east of Long. 171°W., and can be regarded to be an ecologically different stock. Therefore, also from the standpoint of the conservation of resources, it is not considered that the catch of C. bairdi west of Long. 171°W. will have a great influence on the resources of large-sized C. bairdi distributed in high density in the sea east of Long. 168°W., which is the main fishing grounds of the U.S. tonner crab fishery. Thus, there is no reason at all why the Japanese fishing for C. bairdi should be prohibited in the waters west of Long. 171°W.

(b) C. bairdi living west of Long. 171°W. are generally small-sized as compared with those living east of Long. 171°W. Going further to northwest, the size of C. bairdi becomes smaller. Even if the Japanese fishery catches C. bairdi in the waters to the northwest, their commercial value is approximately the same as that of C. opilio and has no influence on the price of C. bairdi which U.S. fishermen catch.

4. Fortunately in 1978, owing to an abnormal meteorological phenomenon, no floating ice went southwards and our fishing operation could be conducted in safety. But if the weather is as usual, there will inevitably be the southward flow of floating ice. Therefore, if the fishing ground is limited to the sea north of 58°N., it will

become impossible to conduct operation in the important fishing season in early spring. This will strike a death blow against the Japanese tanner crab fishing fleet.

In case F.M.P. for 1978 becomes effective, our fishing grounds for tanner crabs will be limited, even though for a short period, to the waters north of 58°N. Therefore if the above F.M.P. must come into effect this year, we demand that its contents be altered similarly to those of P.M.P. which have been changed this time.

We strongly urge you to the full examination of our above-mentioned requests, and demand that necessary measures be taken so that the traditional Japanese crab fishery may continue its fishing operation in the future.

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The Federation of Japan Tuna Fisheries Cooperative Associations

We take the position that resources which migrate far and wide in an ocean and spawn there such as tuna, billfish and sharks, should be controlled all over the ocean by international organs or through cooperation between coastal nations and distant-water fishing nations with the aim of realizing an effective utilization of such resources. For this purpose, we have joined such international organs as ICCAT, IATTC, IOFC and IPFC etc., and cooperate with them.

The U.S. is also a member of these organs, and we understand that it, too, takes the same position as ours.

Regarding the recent regulation for bluefin tuna in the Atlantic Ocean, in the 5th regular general meeting of ICCAT held in November, 1977 in which the U.S. also participated, a resolution to the effect that the tuna, as a whole, should be managed comprehensively over the whole area of the Atlantic Ocean, was adopted.

Since 1975, we have been faithfully observing the ICCAT regulation for conservation of the fishery resources, and we kept reporting on this fact in the ICCAT conference every year. All the member countries are well aware of it.

However, the U.S. announced one-sidedly that 42 Japanese longline fishing boats conducted operation in the Gulf of Mexico in 1977, catching 15,670 tunas. This announcement was an exaggeration of the fact that actually 36 Japanese fishing boats conducted operation. American coastal

fishermen and sporting fishermen took up this matter and made an issue of it, involving even Canada in it. Unfortunately, a serious dispute followed.

In the conference on bluefin tuna held by Japan, the U.S. and Canada, in Washington D.C. in September, 1977, it was confirmed that the Japan's bluefin tuna catch in the Gulf of Mexico in 1977 did not exceed that of 1976. We promised also that we would take voluntary measures to control the catch so as not to exceed the 1976 level. We believed that the issue was settled.

This year, however, there seems to be some misunderstanding on the part of some fishery people in the Status about our bluefin tuna catch in the Gulf of Mexico, and they conduct false propanganda against us, although we are carrying out the self-restrictive measures of the catch of bluefin tuna as pledged. It is our great regret that a wrong impression is being given to the majority of innocent people in the States.

The fishing season of bluefin tuna in the Gulf of Mexico this year has already terminated. The catch of this year is 8,059 as compared with 9,076, that of last year, as of June 11, the end of the fishing season for bluefin tuna in the Gulf. However, the Coalition for Marine Conservation reported in its June issue of 1978, Vol. VI, No. 6, that already 8,000 had been caught by May 24 and that the total catch during the fishing season would exceed 9,000. Also, the NOAA's Atlantic Blufin Newsletter June 16, 1978. No. 6 reported that 10,000 bluefin tunas had been caught. It is difficult for us to understand on what ground such false estimates have been formed.

As mentioned above, we have been observing the regulations of the international organs, for the purpose of both conserving and utilizing tuna and billfish resources. We keep maintaining friendly relations with the fishermen of coastal nations, too. Furthermore, in order to avoid a meaningless conflict with U.S. fishermen, we have been making self-control on our own initiative, even in case such control is considered unnecessary when judged from scientific data and information. We maintain similar self-controlling on our export of marine products to the U.S., too. The fellow tuna fishermen in California are also well aware of these facts.

We request, therefore, the people of good sense in the U.S. that they help their country not to abandon its right and fair attitude that it has kept maintaining to date and switch over, misled by unscientific, false information, to an arbitrary regulation of this fishery.

This also can be said of the Preliminary Management Plan for billfish and sharks in the Atlantic and Pacific Oceans. The U.S. scientists are well aware that the catch control in the U.S. FCZs, in which only several percentages of billfish and sharks, respectively, of both oceans are taken, is unnecessary and that the longline fishery of these species of fish affects sports fishing of the U.S. people in no way at all. That they, nevertheless, have established, or try to establish, large non-retention areas and force us to release even the dead fish, may be contradictory to the spirit of your Fishery Conservation and Management Act. We submitted the statement on our viewpoint concerning the above matter already at the beginning of this year, and here I just reiterated what we had stated in the

above document.

The U.S., too, has made tuna an exception of the fish to come under her fishery jurisdiction because of its highly migrating characteristic. She stands by her opinion about tuna fishery under an international management of the resources and carries out such fishery herself within 200 mile areas of other countries. On the other hand, however, the U.S. imposes rigid restriction upon the longline fishing of other countries by setting the strict regulations to be applied to foreign fisheries which operate within her 200-mile waters. This is an arbitrary and unfair treatment of us, who faithfully observes the fishing rules under international management.

Such being the case, we hereby request that the non-retention clause be excluded from the management plan for billfish and sharks in future, and that the existing foreign fishing regulations relating to billfish and sharks be revised.

Mothership-type Salmon Fishery

As mothership-type salmon fishery operators, we are greatly diesatisfied with new International Convention for the High Sea Fisheries of the North Pacific Ocean, which was signed in the spring of 1978. We have come here to ask you, the U.S. government authorities concerned, for reconsideration on the expansion of fishing grounds.

As U.S. made an extremely drastic proposal at the negotiations for the amendment of the Japan-U.S.-Canada Fishery Treaty in October, 1977, calling for a complete ban on fishing at 170°E and eastward, we hurriedly dispatched a delegation to the United States, and explained to the Government officials concerned and the scientists in Seattle that Japanese off-shore fishery had very little effects on salmon of North American origin, that salmon from North America have generally been protected completely through autonomous implementation by the Japanese side of time and area closure in and after 1974, that salmon from North America, which is caught by the mothership-type salmon fishery, account for only approximately 2% of the total fish catch, that the closed zone is going to be expanded for the protection of such a small part of salmon at the sacrifice of 98 percent of salmon of Asia-origin, that salmon fishing in the Amtitka Channel and eastward is restricted. As it is clear from our years of experience in following up the migratory fish groups and our fishery's own biological statistic data on the migratory fish group coming into the fishing zone of the mothership-type salmon fishery that the major migratory fish groups do not come westward beyond the Amtitka Channel, even in the year in which abundant fish groups migrate

highly, or in such a year as that the migratory fish groups centering on three-year oceanic life come westward beyond the regulated line.

At the same time, we complained of the distress our fishery has been thrown into by the sharp decrease in the number of fishing boats enforced as a result of the Japan-USSR fishery negotiations of 1977, and requested that the United States give heed to the revision of the Agreement, to our fishery's survival.

Those people whom the delegation from our salmon fishery met over here said unanimously, in response to our request, that U.S. aims only at concerning salmon resources of North American origin, that they do not aim at giving a blow to Japanese fishing interests. They gave us an understanding and reassuring answer that the purpose of a new convention should be to find a way in which to enable the Japanese fishing vessels to continue fishing operation without affecting salmon resources of North American origin. We set our mind at ease as we received such a sympathetic reply from them. However, the result of the negotiations is that the sea area south of 56°N and east of 175°E is completely closed, and in addition, a time and area closure system is adopted for the sea area west of 175°E and north of 56°N, and also east of 175°E, contrary to our expectation. We were given a serious shock at such a severe result.

Moreover, as a result of the Japan-USSR fishery negotiations of 1978, in addition to 200-nautical mile exclusive water the USSR declared in 1977, a new sea area, 170°E and westward, has been closed. Since the closed areas which had been expanded under the New INPFC, were added to these

newly closed areas, the mothership-type salmon fishing zones were curtailed to less than 30% of those of 1977. Following 1977, we were forced to decrease the number of ship by 30% in 1978, as well. The industry is now confronted by death.

Fortunately, we have managed to achieve the quota through fishing operation in the narrow fishing grounds this year, as we were blessed with good fishing conditions. However, so long as there is no such assurance that we will continuously be blessed with good fishing conditions in the years following 1978, we earnestly wish to secure fishing grounds, sufficient to attain the quota within the fishing period regardless of fishing conditions.

We believe, as mentioned above, that the salmon resource of North American origin will sufficiently be protected if fishing operation in the Amtitka Channel and eastward is restricted. This has been proved by the fact that, after autonomous restrictions were carried out, red salmon of Bristal Bay origin came back to the coastal area of the Bay every year, exceeding the anticipated volume as per an attached table.

Bearing this fact in mind, and in a spirit of Article 66 of The Composite Single Negotiating Text of the Third Conference on the Law of the Sea, even though not yet brought into existence, which has been formulated through the joint efforts of the United States and Japan, we hope that your kind consideration be paid on realization of the following matters so that the mothership-type salmon ~~and trout~~ fishing may continue to be possible in the future:

1. The currently designated closed zone south of 56°N, should be reduced by three degrees to enable fishery in the waters west of 178°E.

2. Fishery in the currently designated closed zones in the high sea west of 175°E and in the U.S. 200-mile waters, should start on 21st of May and 1st of June, respectively, ten days earlier than the present starting date of fishery in each of the above closed zones.

[Attached Table]

Anticipated migration of salmon of Bristol Bay origin and their returning to the coastal area for the past ten years.

Unit ; million fishes

Year	(A) Anticipated migration	(B) Retuning to coastal area	(B)/(A) x 100%	(C) Off-shore catch by Japanese fleet	(D)=(B)+(C) Total of migratory volume	(C)/(D) x 100%
1968	12.7	8.0	63	1.5	9.5	16
69	16.2	19.1	118	1.6	20.7	8
70	57.2	39.4	69	4.0	43.4	9
71	18.1	15.8	87	1.1	16.9	7
72	6.6	5.4	82	0.7	6.1	11
73	5.8	2.4	41	0.5	2.9	17
74	5.6	11.0	196	0.8	11.8	7
75	12.9	24.2	188	0.4	24.6	2
76	9.5	11.5	121	0.6	12.1	5
77	8.8	9.5	108	0.6	10.1	6
Average of past six years '68-'73	19.4	15.0	77	1.6	16.6	10
Average of past four years '74-'77	9.2	14.1	153	0.6	14.7	5

National Federation of Salmon
Drift-Net Fisheries Association

Our Federation has a total of 178 fishing boats which are based at Nemuro, Kushiro and other ports in Hokkaido and are engaged in salmon drift-net fishing in the waters of the Northern Pacific.

As a member of the Kamenaga Mission of the Japan Fisheries Association visiting the United States again this year. We wish to take this excellent opportunity to express major requests of our fishery people and solicit your favorable consideration in this regard.

First of all, we are indeed pleased to learn that the International Convention for the High Sea Fisheries of the North Pacific Ocean continues to be in force and Japan's fishing operation can be continued as before, thanks to the kind consideration given by your Government during the negotiations held this year for the amendments to the convention. However, the fact that our fishing grounds have been reudced drastically and limited only to the waters where the values as fishing grounds are likely to decrease according to the condition of temperature distribution in the water, can be said a negligence of the characteristics peculiar to ocean fishing.

We therefore desire that a sufficient study be made hereafter on the expansion of zones for our fishing and that scientific surveys be conducted at all costs in the future to establish rational and stable fishery policies.

Secondly, it is no exaggeration to say that the enforcement of the above fishery convention presupposes the

denial of Japanese salmon fishery. This is indeed a matter of great regret and our belief is that fishery resources should be utilized effectively for the welfare of mankind so long as their appropriate management, conservation and reproduction are not affected adversely. We are therefore of the opinion that the convention should be observed in a spirit of promoting continuous fishing on the basis of established scientific theories and working out appropriate measures for this purpose.

From this standpoint we are basically against any measures aimed at restraining all the fishery resources of U.S. origin. Also, we want all of your authorities concerned to give due consideration to the enforcement of the convention in the future in the light of the article on anadromous fishes appearing in the Composite Single Negotiating Text of the Third Conference on the Law of the Sea.

Thirdly, our country is now reviewing measures to promote and expand salmon breeding ~~enterprises~~ activities and an interchange of technical experts and fertilized eggs has so far been conducted actively with the United States and Canada. This is a matter of common interest to both of us, and we firmly believe that such activities will do much toward increasing marine resources, conforming to the spirit of the above-mentioned text of the Conference on the Law of the Sea. Since we are considering to expand such breeding ~~enterprises~~ activities further, we earnestly hope that the United States will extend its cooperation to us and give special consideration on the matter.

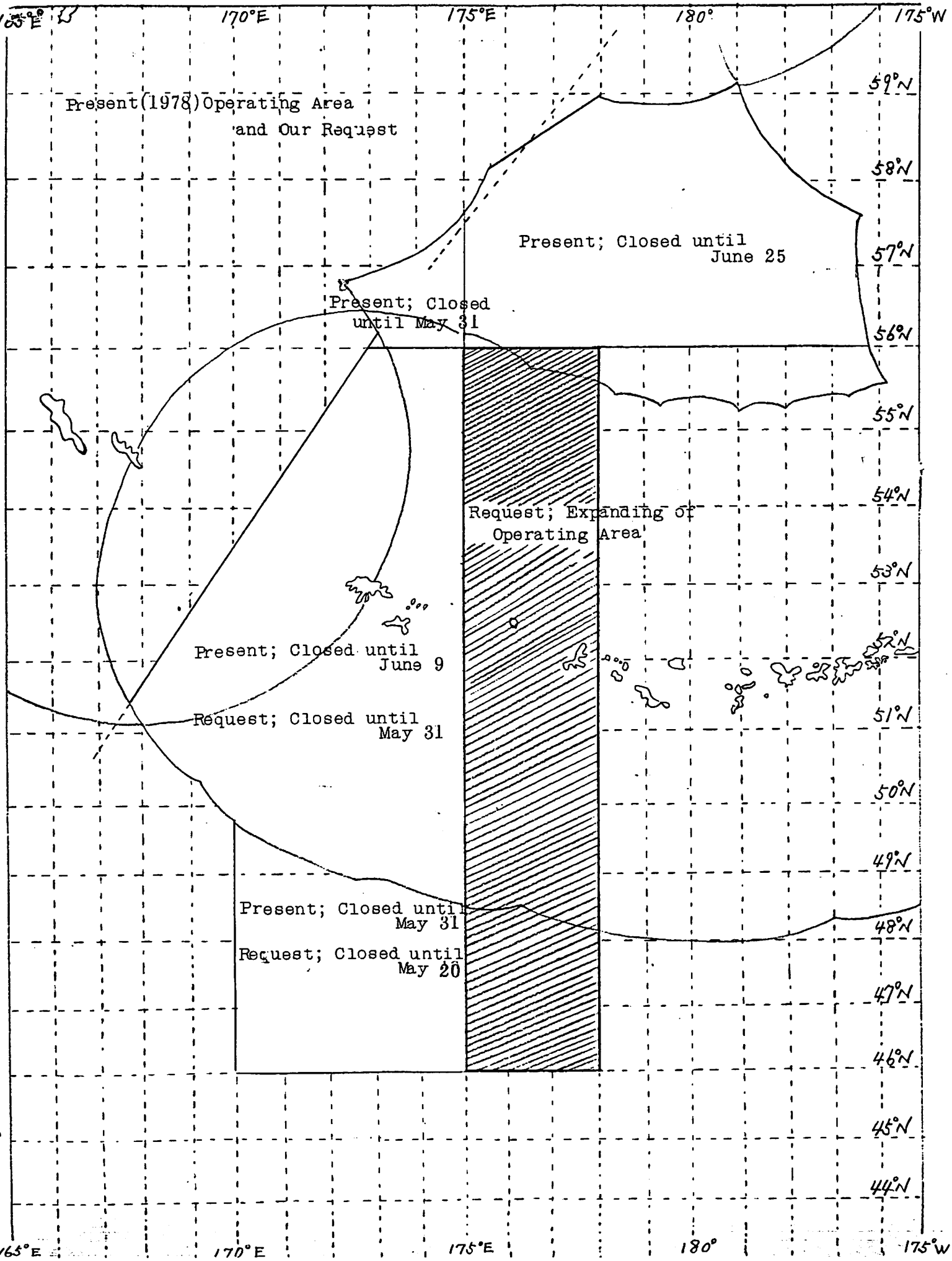
Lastly, and as a fourth point of our request, we wish to add that the fishing boats belonging to our Federation

have been decreased inevitably by 50 percent in number this year as was the case last year. This drastic cut in the number of vessels has dealt a heavy blow not only to their owners and crew but also to the related industries in and around the fishing bases.

This is the direct outcome of the Japan-Soviet fishery negotiations, but it cannot be denied that the results of the enforcement of the ~~I.C.J.N.F.~~ New INPFC also carry undeniable weight as the cause.

Practically, each smaller fishing enterprise belonging to our Federation, depends upon a single boat for its entire operation, and no further blow should be allowed to be dealt upon such fishermen. Such being the situation, we would like you to understand what we have told you so far and to extend your favorable consideration to us in the course of future fishery negotiations between our two countries.

From Tanai 018178



Sec. 611.16 Disposal of fishing gear and other articles.

FR for Monday, Nov. 28, 1977 Part III
(Fishery Conservation and Management (Foreign Fishing)

§611.16 Disposal of fishing gear and other articles.

(a) Except in cases of emergency involving the safety of the ship or crew, no fishing vessel may intentionally place into * the fishery conservation zone, any article, including abandoned fishing gear, which may:

(1) interfere with fishing or obstruct fishing gear or vessels; or

(2) cause damage to any fishery resource or marine mammal.

(b) In the event of the intentional or accidental placing of such articles into the fishery conservation zone, or in the event of encountering such articles, the operator of the vessel shall immediately report the incident to the appropriate Coast Guard Commander (as provided in §611.4) giving:

(1) the name of the reporting person and his vessel;

(2) the nature of the article;

(3) the location of the article; and

(4) the time and date of the incident.

(c) All fishing gear which is set or otherwise deployed in a manner in which it may entrap or otherwise catch fish* shall be tended as frequently as necessary to ensure that its catch remains suitable for the use intended.

November 22, 1977

Mr. Harry L. Rietze, Regional Director
National Marine Fisheries Service
P.O. Box 1668
Juneau, AK 99801

Dear Harry,

Norm Holm stopped through Anchorage Sunday evening on his way home from several days at Dutch Harbor. He dropped off a couple of web samples and some reports of floating web in the Bering Sea that has been causing the fishermen some problems, and some reports on tangled seal pups in similar web. I am forwarding those web samples to you along with a preliminary report on the material he had garnered at Dutch Harbor. Norm has promised to follow up with an expanded report.

The latest incident involved the F/V KATIE K which picked up a large bundle of web (sample enclosed) in the wheel near Unimak Pass and had to be towed to Dutch Harbor. This occurred within the past week.

The second sample of web is one that was picked up by the PACIFIC VOYAGER in mid-October 100 miles northwest of Cape Sarichef. They apparently did not get it tangled in the wheel, but when they found the floating mass of web there was one fur seal pup tangled in it, still alive, which they released, and a dead seabird.

The PG64 on October 19 picked up a bundle of web in the wheel off Priest Rock that stopped her dead and almost put her on the rocks. We don't have a sample of that web but they reported it as four inch mesh, approximately one quarter inch strand.

The F/V BERING SEA picked up a bundle of web two weeks ago on one screw off Priest Rock, which stopped it, although they were able to stay off the rocks on the other screw. The web was removed by a diver.

In addition, the D.J. KEENE (spelling doubtful) two years ago this winter found a dead fur seal pup in a bundle of web in Makushin Bay.

The PEGGY JO reported a live seal pup in a bundle of web, time unknown, and saved a sample of the web. I presume we can pick that up later.

There may be an inaccuracy in the above material, I am working from Norm's hand written notes and the identity of the boat off Priest Rock is doubtful, it may have been the F/V EAGLE rather than the PG64. At any rate, I expect we can verify this in detail from Norm's report.

It's apparent the drifting web problem is still with us. Its undoubtedly aggravated by the great number of boats now operating in the Bering Sea many of whom, according to Norm, are reporting seeing web frequently and who have had minor problems with it tangling in their gear or in their screws. Even considering the increased U.S. activity in that area however, it appears that there has been no reduction in the amount of scrap gear that is being disposed of by the foreign fishery. It sounds like the problem is grave enough so that we should make a concerted effort to insure the requirements imposed on the foreigners to retain scraps are effective.

I'll keep you posted on this as more information becomes available.

Sincerely,

Jim H. Branson
Executive Director

Enclosure

JHB:in

North Pacific Fishery Management Council

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AGENDA ITEM #23
AUGUST 1978

August 18, 1978
MEMORANDUM

To : Council, Scientific and Statistical Committee, and Advisory Panel

From : Jim H. Branson
Executive Director

Subject: New pages for Bering Sea & Aleutian Islands Groundfish Fishery Management Plan.

The attached pages are the suggested replacement for Page 194 in the Fishery Management Plan for the Bering Sea and Aleutian Islands Groundfish Fishery.

The new pages provide for a longline sanctuary on both sides of the Aleutians between 172° West and 179° East. It also provides for a range of options or gear types in the winter halibut savings area in the Bering Sea.

Both of these requests will be made by the Japanese Longline Association and the Management Plan Development Team felt that it would be wise to have them in the plan so that they could be discussed during the public comment period.

Attachment

stocks and to develop fishing gear and fishing practices which will minimize or eliminate their incidental capture.

B. Trawl

(i) No trawling year-round in the "Bristol Bay Pot Sanctuary", (as described in Appendix III and Figure 27) *to prevent conflicts between foreign mobile gear and concentrations of U.S. crab pots; to prevent incidental catch of juvenile halibut which are known to concentrate in this area.*

(ii) No trawling from December 1 to May 31 in the "Winter Halibut-savings Areas" (as described in Appendix II and Figure 27) *to protect winter concentrations of juvenile halibut, to protect spawning concentrations of pollock and flounders.*

(iii) No trawling year-round in that part of the FCZ adjacent to the Aleutian Islands between 172°00'W and 179°00'E *to provide a sanctuary for foreign and domestic longline fishing in recognition of the situation in which highly developed trawl fisheries in both the Bering Sea and Gulf of Alaska have tended to preempt grounds from the traditional longline fishing method. In 1976, no Japanese Danish seiners, side trawlers, or pair trawlers operated in this area; less than one percent of the Japanese Bering Sea/Aleutian stern trawl effort occurred in this area; ___ percent of the Soviet trawl effort occurred in this area; and ___ percent of the Korean trawl effort occurred in this area. Therefore, no significant dislocation of the foreign trawl fishery is expected.*

C. Longline (Note: The following two options are extremes between which are several other options--e.g., shorter period, shallower isobath, fishing shallower than 500 m only when a U.S. observer is aboard to measure incidental halibut catch, etc.)

Option 1

1. "Winter Halibut-savings Areas" (as described in Appendix III and Figure 27):

   (i) December 1 - May 31--no longlining landward of the 500 m isobath.

   (ii) June 1 - November 30--no closures.

To prevent high incidental catch and mortality of juvenile halibut which are known to occur in winter concentrations in the "Winter Halibut-savings Areas".

2. Other areas--no closures.

Option 2

None (Note: if this option is chosen, Section 14.3.1.3.C dealing with domestic longlining will be changed to read "None".)

14.3.2.4 Gear restrictions

None

14.3.2.5 Statistical reporting requirements

As required by 1978 Foreign Fishing Regulations.