



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21688
Juneau, Alaska 99802-1668

April 3, 1989

AGENDA ITEM B - 3

Dr. Clarence G. Pautzke
Executive Director
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, AK 99510

Dear Clarence:

A article in the January 1989 issue of the National Fisherman reported that Clem Tillion was advised by Mr. Shima, of JFA, that Japan had imported 25 percent more sablefish than the quota set by the Council. For review, we have obtained the final quota, catch statistics, and the U.S. export and Japanese import statistics. The import and export statistics identify the country shipped to or received from, not the specific section of the country that the products originated from. Also the data is in product weight but is not identified by product type. In order to compare the data in round weights, we have assumed that normal product form exported to Japan is headed and gutted, eastern cut. A 65 percent product recovery rate was used to convert to round weight. The following statistics reflect the quota, harvest, U.S. export, and Japanese import of sablefish in 1987 and 1988. All weights are in metric tons.

1987

	<u>Quota</u>	<u>Catch</u>
Washington, Oregon, California	12000	12794
Alaska EEZ - DAP	27227	32082
JVP		433
State of Alaska	1296	2116
Total	40523	47425
U.S. Export		28859
Japanese Import		39646



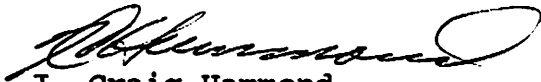
1988

	<u>Quota</u>	<u>Catch</u>
Washington, Oregon, California	10800	10746
Alaska EEZ - DAP	35613	35303
JVP		18
State of Alaska	1515	2374
Total	47928	48441
U.S. Export		29065
Japanese Import		41825

The U.S. export figures are considerably lower than the Japanese import statistics. We suspect there are several reasons for this. Export declarations are often filled out by shipping agents who may not be aware of last minute changes in the species composition of a shipment. Blackcod is the common name for sablefish and in an attempt to correct data, may have listed as cod by Foreign Trade data entry clerks. The Japanese import statistics should be much more accurate, if the final shipping manifests were correctly made out. Japan treats the landing of JV fishery products as imports from the U.S. The small quantity of JVP catch is by all nations in the Bering Sea.

The quantity of sablefish imported by Japan certainly exceeded the quota set by the Council in 1987 and 1988. The reported harvest of sablefish on the U.S. west coast exceeded the import amount in both years and the total U.S. quota. Those quota overruns are not unusual in short intense fisheries. We suspect that there is some amount of illegal sablefish fishing but feel it is inappropriate to gage the level of illegal fishing by comparing Japanese imports with Council quotas.

Sincerely,


J. Craig Hammond
Special Agent in Charge

SUMMARY OF FOREIGN FISHING VESSEL
TRANSSHIPMENT DATA

OCTOBER 1, 1988 THROUGH DECEMBER 31, 1988

Office of Enforcement
National Marine Fisheries Service
Alaska Region

Juneau, Alaska
March 1989

INTRODUCTION

This report summarizes cargo transshipment effort reported by foreign fishing vessels operating within the U.S. EEZ off Alaska. The data contained in the report has been compiled from reports required by the MFCMA. The data covers the period from October 1, 1988, through December 31, 1988, during which a total of 270 foreign transshipments were reported. This represents a 24 percent decrease in the number of transfers reported during the preceding quarter.

This data base does not include transshipment data from the U.S. catcher/processor fleet. Off-loading reports from that segment of industry are compiled into a separate data base. Further, this data base generally does not include cargo data on products loaded onto foreign carriers within the confines of U.S. Customs waters.

DESCRIPTION OF REQUIRED REPORTS

Foreign fishing vessels operating within the U.S. EEZ are required to submit a variety of reports concerning cargo transshipments and cargo on board. Prior to April 25, 1988, only vessels transshipping fish products originating within the U.S. EEZ were required to make these reports. Vessels entering the U.S. EEZ for the purpose of transshipping fish caught outside of the U.S. EEZ were not required to report, however the overwhelming majority of these vessels did report as a matter of routine. Changes in regulatory requirements as of April 25, 1988, now make it mandatory for any vessel conducting support activities within the U.S. EEZ to have a permit and submit all reports required by the MFCMA.

Reports required are as follows:

BEGIN PRODUCT ON BOARD - All foreign vessels operating within the U.S. EEZ are required to submit a BEGIN message 24 hours prior to commencing activities. In conjunction with the BEGIN message, vessels must report all PRODUCT ON BOARD the vessel at the time, including ships stores. The message must specify the species type, product code and metric tonnage.

Products identified for crew consumption have not been entered into the data base and, as a matter of routine, rarely exceed .1 metric ton per species. Products on board originate from a number of sources and the source is only occasionally identified in the message. Sources noted include, the donut hole, Soviet EEZ, WOC fishery, and occasionally, U.S. ports. BEGIN reports may also include products originating from the Alaska EEZ.

Product from U.S. ports is generally reported by transport vessels only and is rarely reflected in the "total transfer" data contained within this report. Products from U.S. ports enters the data base when a foreign carrier picks up U.S. product in port then submits a BEGIN message to conduct support activities with other foreign vessels within the EEZ. Products originating in the Alaska EEZ enter the BEGIN PRODUCT ON BOARD data base when a fishing vessel that has been fishing in the EEZ, departs to international waters and then returns to the EEZ with the original U.S. fish on board.

Some double counting of BEGIN PRODUCT ON BOARD does occur. This happens when a vessel enters the EEZ with product on board (submitting PRODUCT ON BOARD message), departs to work outside the EEZ and then returns to the EEZ with the same product on board (submitting a second PRODUCT ON BOARD message). There is no way under the current message structure to determine the amount of double counting or to determine the exact origin BEGIN PRODUCT ON BOARD.

TRANSFER - Each foreign vessel that will receive fish products from another foreign fishing vessel must transmit a TRANSFER message prior to commencing support activities. This message must indicate when, where and with whom support activities are to be conducted. This message does not contain product information and is used only to facilitate monitoring of at sea transfers if deemed necessary. These messages are not entered in the data base as they contain no product data or other data that cannot be determined through other data sources.

OFFLOADED TO - Each vessel that off-loads cargo to another vessel in the EEZ must submit an OFFLOADED TO message. This message must contain the name and identifiers of the other vessel, date, time, location, and metric tonnage of each species and product type. The message is required regardless of product source and does not specify product origin. All product with the exception of fish oil and meal are identified by allocated species or species groups. Meal and oil are generally produced from offal, undersize and underutilized species. There is no practical after-the-fact method of determining the species composition of meal and oil. Foreign fishing regulations do not require species identification of meal and oil products reported in transfer data messages. It is presumed that catch composition of meal and oil is generally equivalent to the composition of the retained frozen fish.

RECEIVED FROM - Each vessel that receives cargo from another vessel in the EEZ must submit a RECEIVED FROM message. This message contains information identical to the OFFLOADED TO

message and is used as a verification report for the OFFLOADED TO data base. If the two data bases do not match, the error is identified and corrected.

DATA LIMITATIONS

The data base does not and cannot make any adjustments for BEGIN PRODUCT ON BOARD messages that may have been inadvertently omitted from the data base. It is presumed however that omission of such messages is less than 5 percent of the data base. The data base also cannot make any adjustments for product on board vessels at the beginning of the new year or preceding quarter. Further the data base cannot make adequate adjustment for products originating in U.S. ports

It is the position of the Office of Enforcement that verification of reported catch can only be accomplished by auditing the complete record of individual vessels. Summary cargo transshipment data cannot be used to adequately verify MFCMA catch statistics and attempts to do so may lead to erroneous and misleading conclusions.

SUMMARY BY NATION

The following tables summarize transshipment data by nation (SUM-1) and species (SUM-2). A nation by nation summary follows:

TABLE: SUM-1

ALL NATIONS - SUMMARY OF 1988 4TH QUARTER TRANSFER DATA
(by nation/metric tonnage)

NATION	TOTAL 1/ TRANSFERS	SUBTOTAL 2/ TRANSPORT- TRANSPORT	TOTAL 3/ BEGIN ON BOARD	SUBTOTAL 4/ ON BOARD TRANSPORTS	SUBTOTAL 5/ ON BOARD FFV
JAPAN	21,783	1,203	30,662	29,793	869
KOREA	33,049	0	27,742	654	27,087
USSR	0	0	0	0	0
POLAND	*	*	*	*	*
CHINA	*	*	*	*	*
TOTAL	54,832	1,203	58,404	30,447	27,956

* Aggregate data contains reports from fewer than three vessels or companies. Release of data prohibited by confidentiality restrictions of MFCMA.

1/ Includes all transfers regardless of origin of fish products. Sources include U.S. EEZ, Soviet EEZ, donut hole, and WOC. Generally does not include U.S. catcher/processor cargo or domestic cargo from U.S. ports. Figure does not include cargo that was transferred within the donut hole and transported directly to a foreign port. Donut hole transshipments as such are not contained in U.S. government data base.

2/ Subtotal of transfers from one transport vessel to another. This quantity generally presumed to be a double count of cargo (i.e., counted once when transferred from the fishing vessel to the cargo vessel, counted a second time when transferred from the cargo vessel to a second cargo vessel).

3/ Total of all BEGIN PRODUCT ON BOARD. Sources include U.S. EEZ, Soviet EEZ, donut hole, WOC, and in some circumstances domestic catch from U.S. ports. Vast majority presumed to be donut hole reported catch.

4/ Subtotal of BEGIN PRODUCT ON BOARD reported by transport vessels. Majority presumed to be donut hole reported catch.

5/ Subtotal of BEGIN PRODUCT ON BOARD reported by fishing vessels other than transports. All presumed to be either donut hole reported catch or Soviet EEZ. The closest approximation of legal product originating from within the U.S. EEZ would be determined by the equation of: $1/ - 2/ - 5/ = \text{U.S. EEZ Origin}$

TABLE: SUM-2

ALL NATIONS - SUMMARY OF 1988 4TH QUARTER TRANSFER DATA
(total transferred by nation/species/metric tonnage)

SPECIES	JAPAN	USSR	KOREA	POLAND	CHINA	TOTAL
POLLOCK	9,987	0	23,480	*	*	33,467
PACIFIC COD	807	0	1,991	*	*	2,798
FLOUNDR	1,926	0	1,337	*	*	3,263
YELLOW- FIN SABLE- FISH	4,657	0	4,810	*	*	9,467
	2	0	0	*	*	2
POP	3	0	3	*	*	6

OTHER SPEC.	0	0	105	*	*	105
UNID. 6/ SPEC.	4,401	0	1,323	*	*	5,724

* Aggregate data contains reports from fewer than three vessels or companies. Release of data prohibited by confidentiality restrictions of MFCMA.

6/ Fish meal and oil are not identified by species but are normally derived from undersize or offal from target species or from underutilized species. Species composition of unidentified species is generally presumed to be equivalent to the species composition to the retained frozen fish.

JAPAN - Japanese vessels reported off-loading 14,914 metric tons of product within the EEZ. This represents a 46 percent increase in total tonnage transferred from the third quarter of 1988. Excluding product reported on board fishing vessels entering the EEZ and transport to transport operations this would equate to 19,711 MT of product originating within the EEZ, a increase of 45 percent over the third quarter of 1988. An unknown portion of this amount would have been carried over from the third quarter of 1988, therefore absolute comparison to fourth quarter 1988 catch data cannot be made. Increases are attributed to the reapportionment of pollock in September and ongoing yellowfin sole and other flatfish fisheries in the fourth quarter. Disregarding unidentified species (presumed to be comprised of primarily pollock and yellowfin sole), 57 percent of all transshipment tonnage was pollock products with the majority of the remainder being yellowfin sole and flounder products. Transshipped species composition is consistent with the September through December JV fisheries that occurred within the EEZ and the directed pollock fishery in the donut hole. Pollock surimi comprised the largest portion (45 percent) of the cargo transshipped followed by fish meal (20 percent). Detailed summary of Japanese transshipment data by species and product type are listed in tables JA-1 through JA-5.

KOREA - Korean vessels reported off-loading 33,049 MT of product within the EEZ. This represents a 110 percent increase from the 3rd quarter of 1988 in total total tonnage transferred. Excluding product reported on board fishing vessels entering the EEZ this would equate to 5,967 MT of product originating within the EEZ for a decrease of 10 percent from the third quarter. An unknown portion of this amount would have been carried over from the third quarter of 1988, therefore absolute comparison to

fourth quarter 1988 catch data cannot be made. Disregarding unidentified species (presumed to be comprised of primarily pollock), 74 percent of all transshipment tonnage was pollock products with the majority of the remainder being yellowfin sole products. Transshipped species composition is consistent with the JV fisheries that occurred within the EEZ and the directed pollock fishery in the donut hole. Whole pollock comprised the largest portion (59 percent) of the cargo transshipped followed by whole yellowfin sole (15 percent). Detailed summary of Korean transshipment data by species and product type are listed in tables KS-1 through KS-5.

USSR - Soviet vessels did not report any transshipments during the fourth quarter of 1988. Soviets also did not conduct any joint venture activities within the EEZ.

POLAND - Polish vessels reported limited off-loading of product within the EEZ during the fourth quarter. Polish vessels did conduct limited JV operations within the EEZ and it is presumed most of their transshipment activities occurred in the donut hole. Off-loading tonnages reported were consistent with JV fisheries and products reported on board during check in.

CHINA - Chinese vessels reported limited activities during the fourth quarter of 1988. Chinese did not conduct any JV activities during the fourth quarter. Product reported on board Chinese vessels upon check in exceeded amounts reported as transferred.

TABLE: PRODUCT CODE LISTING

PRODUCT CODE	DESCRIPTION
BSO	Squid or octopus, beak removed
CN	Canned meat
F	Fillets, with skin/two per fish
FB	Fillets, one-piece (butterfly) with skin
FBN	Fillets, one-piece (butterfly) without skin
FN	Fillets, without skin/two per fish
FO	Fish oil
G	Gutted only
GG	Gutted and gilled
H	Headed only
HDS	Heads, separate from remainder of fish
HG	Headed and gutted
HGT	Headed, gutted, and tails removed
IO	Intestinal organs separate from remainder of fish
M	Fish meal
MSO	Squid or octopus mantles
O	Other product
OS	Otoshimi - frozen minced fish product (Japan)
P	Pectoral collars separate from remainder of fish
R	Roe separate from remainder of fish
S	Flounder steaks - diagonal cut from midsection of fish
ST	Flounder pieces - punched or stamped from midsection of fish
SU	Surimi - frozen minced fish product (Japan)
SW	Skate wings
TS	Tara Shiniku - frozen minced fish product (Japan)
TSO	Squid or octopus tentacles
TU	Tucza - heads, guts, fins, tail, and portions of belly flap removed (Poland)
W	Whole fish

TABLE: JA-1

JAPAN - TOTAL TRANSFERS (4RD QTR - 1988)
 (by species/product/metric tonnage)

Product /Species
 Type /

	Pollock	Pacific Cod	Other Flounder	Yellowfin Sole	Sablefish	P.O.P	Unidentified Species	TOTAL
F	146	100	0	1	0	0	5	252
FN	29	0	0	0	0	0	0	29
FO	0	0	0	0	0	0	393	393
G	0	0	29	0	0	0	0	29
H	5	0	51	289	0	0	0	345
HG	21	652	1,005	181	2	3	0	1,864
M	0	0	0	0	0	0	4,003	4,003
R	215	0	0	0	0	0	0	215
S	0	0	469	3,509	0	0	0	3,978
SU	9,177	0	0	0	0	0	0	9,177
W	394	55	372	677	0	0	0	1,498
TOT	9,987	807	1,926	4,657	2	3	4,401	21,783

TABLE: JA-2

JAPAN - SUBTOTAL TRANSFERS - TRANSPORT TO TRANSPORT (4TH QTR - 1988)
 (by species/product/metric tonnage)

Product /Species
 Type /

	Pollock	Pacific Cod	Other Flounder	Unidentified Species	TOTAL
HG	0	1	1	0	2
M	0	0	0	217	217
R	52	0	0	0	52
SU	932	0	0	0	932
TOT	984	1	1	217	1,203

TABLE: JA-3

JAPAN - TOTAL BEGIN PRODUCT ON BOARD - ALL VESSELS (4TH QTR - 1988)
 (by species/product/metric tonnage)

Product /Species

Type /

	Pollock	Pacific Cod	Other Flounder	Rockfish	Sablefish	Yellowfin Sole	Turbots	P.O.P.	Other Species	Unid. Species	TOTAL
F	317	7	0	0	0	0	0	0	0	0	324
FB	0	428	0	0	0	0	0	0	0	0	428
FN	1,179	0	0	0	0	0	0	0	0	0	1,179
FO	0	0	0	0	0	0	0	0	0	603	603
H	0	0	20	0	0	0	0	0	0	0	20
HDS	0	40	0	0	0	0	0	0	0	0	40
HG	525	2,369	32	1	23	0	47	3	1	185	3,186
IO	0	2	0	0	0	0	0	0	0	0	2
M	0	0	0	0	0	0	0	0	0	3,853	3,853
R	725	0	0	0	0	0	0	0	0	1	726
S	0	0	100	0	0	453	0	0	0	0	553
SU	13,318	0	0	0	0	0	0	0	0	56	13,374
W	4,118	312	446	0	0	1,424	0	0	29	45	6,374
TOT	20,182	3,158	598	1	23	1,877	47	3	30	4,743	30,662

TABLE: JA-4.

JAPAN - SUBTOTAL BEGIN PRODUCT ON BOARD - TRANSPORTS ONLY (4TH QTR - 1988)
 (by species/product/metric tonnage)

Product /Species											
Type /											
	Pollock	Pacific Cod	Other Flounder	Rockfish	Sablefish	Yellowfin Sole	Turbots	P.O.P.	Other Species	Unid. Species	TOTAL
F	284	7	0	0	0	0	0	0	0	0	324
FB	0	428	0	0	0	0	0	0	0	0	428
FN	1,179	0	0	0	0	0	0	0	0	0	1,179
FO	0	0	0	0	0	0	0	0	0	473	473
H	0	0	20	0	0	0	0	0	0	0	20
HDS	0	40	0	0	0	0	0	0	0	0	40
HG	525	2,369	32	1	23	0	47	3	1	185	3,186
IO	0	2	0	0	0	0	0	0	0	0	2
M	0	0	0	0	0	0	0	0	0	3,695	3,695
R	678	0	0	0	0	0	0	0	0	1	726
S	0	0	100	0	0	453	0	0	0	0	553
SU	12,817	0	0	0	0	0	0	0	0	56	13,374
W	4,118	312	446	0	0	1,424	0	0	29	45	6,374
TOT	19,601	3,158	598	1	23	1,877	47	3	30	4,455	29,793

TABLE: JA-5

JAPAN - SUBTOTAL BEGIN PRODUCT ON BOARD - FISHING VESSELS ONLY (4TH QTR - 1988)
 (by species/product/metric tonnage)

Product /Species			
Type /			
	Pollock	Unidentified Species	TOTAL
F	33	0	33
FO	0	130	130
M	0	158	158
R	47	0	47
SU	501	0	501
TOT	581	288	869

TABLE: KS-1

KOREA - TOTAL TRANSFERS (4TH QTR - 1988)
 (by species/product/metric tonnage)

Product /Species

Type /

	Pollock	Pacific Cod	Other Flounder	Yellowfin Sole	Other Species	P.O.P.	Unidentified Species	TOTAL
H	0	3	0	0	0	0	0	3
HDS	0	45	0	0	0	0	0	45
HG	37	113	0	0	0	0	0	150
HGT	0	0	0	8	0	0	0	8
IO	1	4	0	0	0	0	0	5
M	0	0	0	0	0	0	1,323	1,323
O	0	1	0	0	0	0	0	1
R	86	0	0	0	0	0	0	86
SU	3,845	18	0	0	0	0	0	3,863
W	19,511	1,807	1,337	4,802	105	3	0	27,565
TOT	23,480	1,991	1,337	4,810	105	3	1,323	33,049

TABLE: KS-2

KOREA - SUBTOTAL TRANSFERS - TRANSPORT TO TRANSPORT (4TH QTR - 1988)
 (by species/product/metric tonnage)

Product /Species

Type /

NONE

TABLE: KS-3

KOREA - TOTAL BEGIN PRODUCT ON BOARD - ALL VESSELS (4TH QTR - 1988)
 (by species/product/metric tonnage)

Product /Species
 Type /

	Pollock	Pacific Cod	Other Flounder	Yellowfin Sole	Other Species	Unidentified Species	TOTAL
FO	0	0	0	0	0	5	5
H	182	0	0	0	0	0	182
HG	37	1	0	0	0	0	38
IO	1	0	0	0	0	0	1
M	0	0	0	0	0	1,184	1,184
O	1,216	0	0	0	0	0	1,216
R	71	0	0	0	0	0	71
SU	1,615	0	0	0	0	0	1,615
W	22,921	47	94	365	3	0	23,430
TOT	26,043	48	94	365	3	1,189	27,742

TABLE: KS-4

KOREA - SUBTOTAL BEGIN PRODUCT ON BOARD - TRANSPORTS ONLY (4TH QTR - 1988)
 (by species/product/metric tonnage)

Product /Species
 Type /

	Pollock	Unidentified Species	TOTAL
M	0	149	149
W	505	0	505
TOT	505	149	654

TABLE: KS-5

KOREA - SUBTOTAL BEGIN PRODUCT ON BOARD - FISHING VESSELS ONLY (4TH QTR - 1988)
 (by species/product/metric tonnage)

Product /Species
 Type /

	Pollock	Pacific Cod	Other Flounder	Yellowfin Sole	Other Species	Unidentified Species	TOTAL
FO	0	0	0	0	0	5	5
H	182	0	0	0	0	0	182
HG	37	1	0	0	0	0	38
IO	1	0	0	0	0	0	1
M	0	0	0	0	0	1,034	1,034
O	1,216	0	0	0	0	0	1,216
R	71	0	0	0	0	0	71
SU	1,615	0	0	0	0	0	1,615
W	22,416	47	94	365	3	0	22,925
TOT	25,538	48	94	365	3	1,039	27,087

TABLE: UR-1

USSR - TOTAL TRANSFERS (4TH QTR - 1988)
(by species/product/metric tonnage)

=====

Product /Species
Type /

=====

NO USSR TRANSFERS DURING 4TH QUARTER

TABLE: PL-1

POLAND - TOTAL TRANSFERS (4TH QTR - 1988)
(by species/product/metric tonnage)

=====
Product /Species
Type /
=====

AGGREGATE DATA CONTAINS REPORTS FROM FEWER THAN THREE VESSELS OR COMPANIES. RELEASE OF DATA
PROHIBITED BY CONFIDENTIALITY RESTRICTIONS OF MFCMA.

TABLE: CH-1

CHINA - TOTAL TRANSFERS (4TH QTR - 1988)
(by species/product/metric tonnage)

=====
Product /Species
Type /
=====

AGGREGATE DATA CONTAINS REPORTS FROM FEWER THAN THREE VESSELS OR COMPANIES. RELEASE OF DATA
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SUMMARY OF FOREIGN FISHING VESSEL
TRANSSHIPMENT DATA FOR THE CALENDAR YEAR OF 1988

Office of Enforcement
National Marine Fisheries Service
Alaska Region

Juneau, Alaska
March 1989

INTRODUCTION

This report summarizes cargo transshipment effort reported by foreign fishing vessels operating within the U.S. EEZ off Alaska. The data contained in the report has been compiled from reports required by the MFCMA. The data covers the period from January 1, 1988, through December 31, 1988, during which a total of 3,330 foreign transshipments were reported. This report summarizes quarterly reports that have been published throughout the year.

This data base does not include transshipment data from the U.S. catcher/processor fleet. Off-loading reports from that segment of industry are compiled into a separate data base. Further, this data base generally does not include cargo data on products loaded onto foreign carriers within the confines of U.S. Customs waters.

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Foreign fishing vessels operating within the U.S. EEZ are required to submit a variety of reports concerning cargo transshipments and cargo on board. Prior to April 25, 1988, only vessels transshipping fish products originating within the U.S. EEZ were required to make these reports. Vessels entering the U.S. EEZ for the purpose of transshipping fish caught outside of the U.S. EEZ were not required to report, however the overwhelming majority of these vessels did report as a matter of routine. Changes in regulatory requirements as of April 25, 1988, now make it mandatory for any vessel conducting support activities within the U.S. EEZ to have a permit and submit all reports required by the MFCMA. Descriptions of the various reports are contained within the previously published quarterly reports for 1988.

DATA LIMITATIONS

The data base does not and cannot make any adjustments for BEGIN PRODUCT ON BOARD messages that may have been inadvertently omitted from the data base. It is presumed however that omission of such messages (when required) is less than 5 percent of the data base. The data base also cannot make any adjustments for product on board vessels at the beginning of the new year or preceding quarter. Further the data base cannot make adequate adjustment for products originating in U.S. ports

It is the position of the Office of Enforcement that verification of reported catch can only be accomplished by auditing the complete record of individual vessels. Summary cargo transshipment data cannot be used to adequately verify MFCMA

catch statistics and attempts to do so may lead to erroneous and misleading conclusions.

SUMMARY BY NATION

The following tables summarize transshipment data by nation (SUM-1) and species (SUM-2).

TABLE: SUM-1

ALL NATIONS - SUMMARY OF 1988 TRANSFER DATA (by nation/metric tonnage)

NATION	TOTAL <u>1/</u> TRANSFERS	SUBTOTAL <u>2/</u> TRANSPORT- TRANSPORT	TOTAL <u>3/</u> BEGIN ON BOARD	SUBTOTAL <u>4/</u> ON BOARD TRANSPORTS	SUBTOTAL <u>5/</u> ON BOARD FFV
JAPAN	178,751	1,234	71,032	61,138	9,896
KOREA	209,876	0	73,151	25,865	46,267
USSR	84,625	0	41,366	37,193	4,168
POLAND	68,195	26,777	42,240	4,939	37,301
CHINA	13,206	0	1,769	0	1,769
TOTAL	554,653	28,011	229,558	129,135	99,401

1/ Includes all transfers regardless of origin of fish products. Sources include U.S. EEZ, Soviet EEZ, donut hole, and WOC. Generally does not include U.S. catcher/processor cargo or domestic cargo from U.S. ports. Figure does not include cargo that was transferred within the donut hole and transported directly to a foreign port. Donut hole transshipments as such are not contained in U.S. government data base.

2/ Subtotal of transfers from one transport vessel to another. This quantity generally presumed to be a double count of cargo (i.e., counted once when transferred from the fishing vessel to the cargo vessel, counted a second time when transferred from the cargo vessel to a second cargo vessel).

3/ Total of all BEGIN PRODUCT ON BOARD. Sources include U.S. EEZ, Soviet EEZ, donut hole, WOC, and in some circumstances domestic catch from U.S. ports. Vast majority presumed to be donut hole reported catch.

4/ Subtotal of BEGIN PRODUCT ON BOARD reported by transport vessels. Majority presumed to be donut hole reported catch.

5/ Subtotal of BEGIN PRODUCT ON BOARD reported by fishing vessels other than transports. All presumed to be either donut hole reported catch or Soviet EEZ. The closest approximation of legal product originating from within the U.S. EEZ would be determined by the equation of: $\frac{1}{2} - \frac{2}{5} = \text{U.S. EEZ Origin}$

TABLE: SUM-2

ALL NATIONS - SUMMARY OF 1988 TRANSFER DATA
(total transferred by nation/species/metric tonnage)

SPECIES	JAPAN	USSR	KOREA	POLAND	CHINA	TOTAL
POLLOCK	94,896	4,037	114,137	46,519	3,177	262,766
PACIFIC COD	5,508	26,986	18,159	28	32	50,713
PACIFIC HAKE	0	0	0	1,841	0	1,841
FLOUNDR	13,358	13,788	8,095	0	1,819	37,060
YELLOW- FIN SABLE- FISH	28,528	27,456	54,764	0	7,276	118,024
ATKA MACKRL	2	0	0	0	0	2
	0	862	4,419	0	0	5,281
POP	5	0	581	1	0	587
TURBOTS	16	0	0	0	0	16
ROCK- FISH	0	0	240	0	0	240
OTHER SPEC.	12	0	424	0	0	436
UNID.6/ SPEC.	36,419	10,337	9,057	19,806	902	76,521

6/ Fish meal and oil are not identified by species but are normally derived from undersize fish, offal from target species or from underutilized species. Species composition of unidentified species is generally presumed to be equivalent to the species composition to the retained frozen fish.

JAPAN - Japanese vessels reported off-loading 178,751 MT of product within the EEZ during 1988. Not counting

transshipments between cargo vessels and product on board fishing vessels entering the EEZ this equates to 167,621 MT of product presumed to have originated from JV activities within the EEZ. Japanese vessels reported JV catch of 692,079 MT for 1988. Primary products transshipped by the Japanese (EEZ origin) were:

<u>SPECIES</u>	<u>PRODUCT</u>	<u>CARGO MT</u>	<u>JV CATCH MT</u>
Pollock	Surimi	81,118	
	Roe	2,864	

	total all pollock	87,278	555,121

Yellowfin	Steaks	22,445	

	total all yellowfin	28,507	75,789

Flounder	Head & Gut	8,634	

	total all flounder	13,357	32,808

Mixed Spec.	Fish Meal	32,219	

	Total All Species	167,621	692,079

KOREA - Korean vessels reported off-loading 209,876 MT of product within the EEZ during 1988. Not counting transshipments between cargo vessels and product on board fishing vessels entering the EEZ this equates to 163,609 MT of product presumed to have originated from JV activities within the EEZ. Korean vessels reported JV catch of 390,246 MT for 1988. Primary products transshipped by the Koreans (EEZ origin) were:

<u>SPECIES</u>	<u>PRODUCT</u>	<u>CARGO MT</u>	<u>JV CATCH MT</u>
Pollock	Whole	41,360	
	Surimi	15,530	

	total all pollock	72,164	229,577

Pacific Cod	Whole	13,621	

	total all Pacific cod	17,916	27,994

Yellowfin	Whole	54,158	

	total all Yellowfin	54,764	82,940

Mixed Spec.	Fish Meal	7,478	

	Total All Species	163,609	390,246

USSR - Soviet vessels reported off-loading 84,625 MT of product within the EEZ during 1988. Not counting transshipments between cargo vessels and product on board fishing vessels entering the EEZ this equates to 80,457 MT of product presumed to have originated from JV activities within the EEZ. Soviet vessels reported JV catch of 181,464 MT for 1988. Primary products transshipped by the Soviets (EEZ origin) were:

<u>SPECIES</u>	<u>PRODUCT</u>	<u>CARGO MT</u>	<u>JV CATCH MT</u>
Pacific cod	Head & Gut	22,496	
total all Pacific cod		26,478	60,316
Flounders	Head & Gut	11,310 **	
total all flounders		13,788 **	47,509
Yellowfin	Canned	2,957	
	Head & Gut	22,324 **	
total all yellowfin		28,615 **	41,937
Mixed Spec.	Fish Meal	9,735	
Total All Species		80,457	181,464

** Soviet production mixes flounders and yellowfin sole in the same block and transfers are reported as mixed species. Break down between yellowfin and flounder products is an estimate determined at time of data entry and not necessarily representative of the actual species composition of products.

POLAND - Polish vessels reported off-loading 68,195 MT of product within the EEZ during 1988. Not counting transshipments between cargo vessels and product on board fishing vessels entering the EEZ this equates to 4,117 MT of product presumed to have originated from JV activities within the EEZ (based on face value of all data). Polish vessels reported JV catch of 15,175 MT for 1988.

A review of Polish transshipment data reveals heavy activity during the first quarter of 1988 (64 percent of all transshipment tonnage). This activity was prior to implementation of mandatory reporting requirements for vessels entering the the EEZ for the sole purpose of conducting cargo transfers of donut hole origin fish. The practice of many Polish vessels at the time was to report the particulars of the cargo transfers conducted within the EEZ but not to report cargo on board at the time of entry. At the time no begin

report was required and the transfer reports were, in effect, voluntary. The end result of the partial submission of data is that product by product analysis cannot be made. An example being pollock. Using the equation of total transfers less transshipments between cargo vessels and cargo reported on board fishing vessels at time of entry reflects a total of 2,836 MT of pollock fillets (of EEZ origin) being transshipped (see footnote 5/, table SUM-1). Using the same equation for all pollock transshipped reflects a total transshipment of only 1,789 MT of all pollock products (of EEZ origin). This results in a total for which the whole is less than sum of its parts. The probable explanation is that only part of the vessels with product on board from the donut hole reported such at time of entry into the EEZ. Total reporting in 1989 should alleviate most such anomalies.

Analysis is further complicated by the common practice of Polish vessels to transship product between cargo vessels. This practice has been used by the Polish fleet to facilitate importation of catch into the United States by transshipping to U.S. flag carriers on the high seas. The Polish fleet has been using larger Polish flag cargo vessels to support Polish fishing vessels both inside the EEZ and within the donut hole. These larger cargo vessels remain on the grounds and serve as floating warehouses. The larger Polish cargo vessels then periodically transship at sea to smaller U.S. cargo vessels which then land the fish at U.S. ports. On occasion the on grounds Polish cargo vessel will also transship to another Polish cargo vessel that will in turn land at a foreign port.

CHINA - Chinese vessels reported off-loading 13,206 MT of product within the EEZ during 1988. Not counting transshipments between cargo vessels and product on board fishing vessels entering the EEZ this equates to 11,437 MT of product presumed to have originated from JV activities within the EEZ. Chinese vessels reported JV catch of 26,742 MT for 1988. In regards to pollock, the same anomalies found in the Polish data are present in the Chinese data with 98 percent of all Chinese pollock products being transshipped in the first quarter of 1988. Data for the flounder and yellowfin sole fisheries however are not affected by the lack of check in reports. Primary products transshipped by the Chinese (EEZ origin) were:

<u>SPECIES</u>	<u>PRODUCT</u>	<u>CARGO MT</u>	<u>JV CATCH MT</u>
Flounders	Head & Gut	945	
	Whole	874	

	total all Flounders	1,819	4,292
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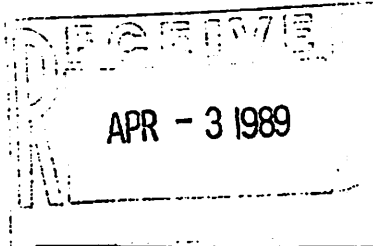
Yellowfin	Head & Gut	2,601	
	Whole	4,674	

total all Yellowfin		7,276	11,016
		-----	-----
Total All Species		11,437	26,742



AGENDA B-3
APRIL 1989

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668



NEWS RELEASE
Steven Pennoyer
907-586-7221

March 28, 1989

For Immediate Release

NEW DEFINITION OF DIRECTED FISHING IN THE ALASKA GROUND FISH FISHERY

The definition of directed fishing has been changed by emergency rule, according to Steven Pennoyer, Director, Alaska Region, National Marine Fisheries Service. This rule will remain in effect for 90 days and may be extended for an additional 90 days. The wording of the definition as contained in new regulations is summarized below:

Directed Fishing means: (1) With respect to any target species or the "other species" category other than sablefish caught in the Gulf of Alaska with hook-and-line gear and sablefish in the Bering Sea and Aleutian Island subareas, fishing that results in the retention on board a fishing vessel of that species in an amount equal to or greater than 20 percent of the total amount of fish and fish products on board, as calculated in round weight equivalents, at any time.

(2) With respect to sablefish caught with hook-and-line gear in the Gulf of Alaska, fishing that results in the retention on board a fishing vessel of sablefish in an amount equal to or greater than 4 percent of the total amount of fish and fish products on board, as calculated in round weight equivalents, at any time.

(3) With respect to sablefish in the Bering Sea and Aleutian Islands subareas, fishing that results in the retention on board a fishing vessel of an amount of sablefish equal to or greater than:

(a) 1 percent or more of the total amount of fish and fish products, other than Pacific ocean perch and Greenland turbot, as calculated in round weight equivalents, at any time, plus

(b) 10 percent or more of the total amount of Pacific ocean perch and Greenland turbot and Pacific ocean perch and Greenland turbot products, as calculated in round weight equivalents, at any time.

For further information, contact Ron Berg, Fishery Management Division, 907-586-7230.





**UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration**

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

Agenda Item B-3

BYCATCH AND PROHIBITED SPECIES ENFORCEMENT

BYCATCH

The definition of "directed fishing" was changed by emergency rule on March 28, to a retention only basis. That rule also implemented bycatch rates for sablefish in the Bering Sea/Aleutian Islands and for hook and line gear in the Gulf of Alaska. The normal management practice for NMFS is to close directed fishing for a species and allow a bycatch to continue until TAC is reached and then shift that species to PSC status. If a vessel is fishing in an area in which a species has been limited to bycatch or has a special bycatch rate and has retained quantities exceeding the limit, the vessel will be liable for penalties ranging from warnings to seizure.

As an example, trawlers fishing in the Gulf of Alaska are limited to 20 percent bycatch of sablefish. A trawler fishing for Pacific cod has retained in round weight equivalents 100 metric tons of fish, in that catch it has retained its legal limit of sablefish, 20 metric tons. The vessel shifts to the Bering Sea and continues to fish for Pacific cod. It is limited to a 1 percent bycatch of sablefish in that area. The vessel has on board a quantity of sablefish which grossly exceeds the allowed limit and stringent enforcement action would be considered. The sablefish bycatch regulation and the directed fishing closures that restrict fishing to bycatch levels, make it a strict liability to have more than the bycatch rate allowed in the fishing area on board.

PROHIBITED SPECIES

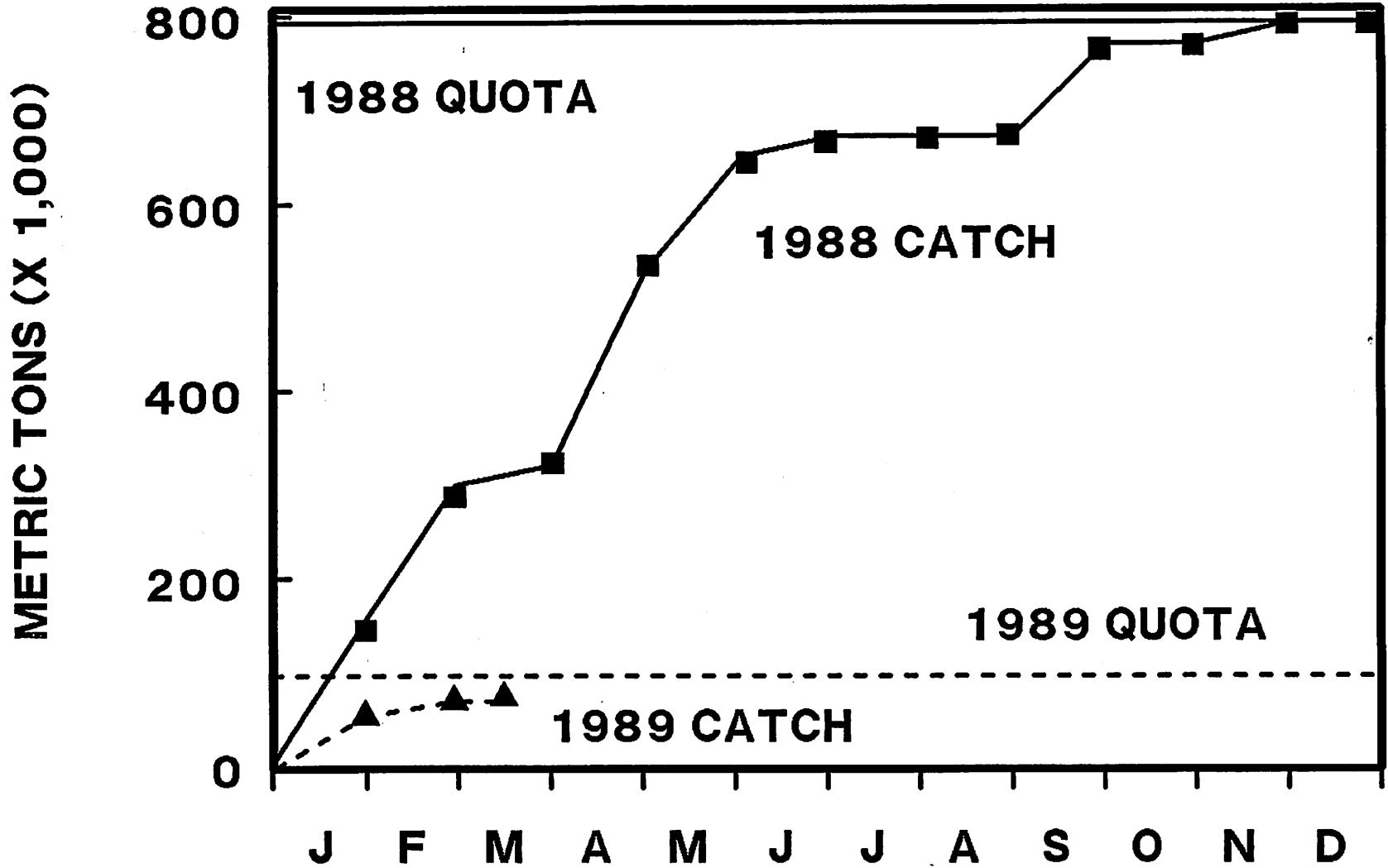
When the total allowable catch (TAC) for a species is taken, NMFS closes fishing for that species and further catches must be treated as a prohibited species. Prohibited species must be sorted from catches as soon as possible and returned to the sea with a minimum of injury. Further, regulations stipulate that it is a rebuttable presumption that prohibited species found aboard a vessel were caught and retained in violation. Vessels fishing in an area in which a species is in a prohibited species category (PSC) and that have retained catches of that species on board will be cited for illegal retention. Under the rebuttable



presumption the vessel operator must prove that the fish were legally taken. If the proof is accepted by prosecution, the charges will be dropped. If the proof is not accepted, the operator maybe assessed penalties. Further, if field enforcement notes evidence that prohibited species were caught and retained after the closure, stricter sanctions including vessel seizure would be considered. It is recommended that vessels off-load catches of those species before operating in an area where the species is a PSC.

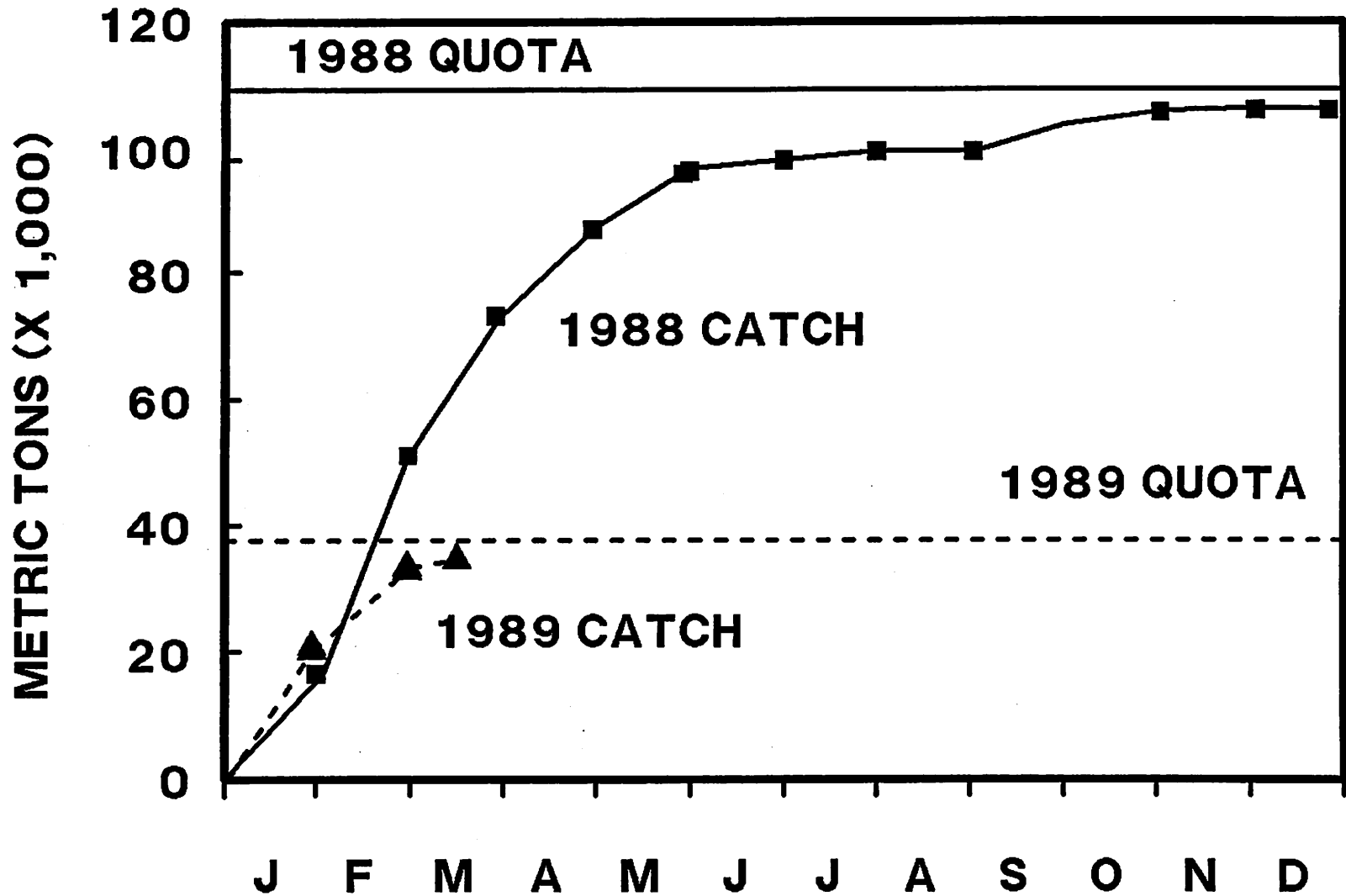
JVP CATCH

BERING SEA POLLOCK



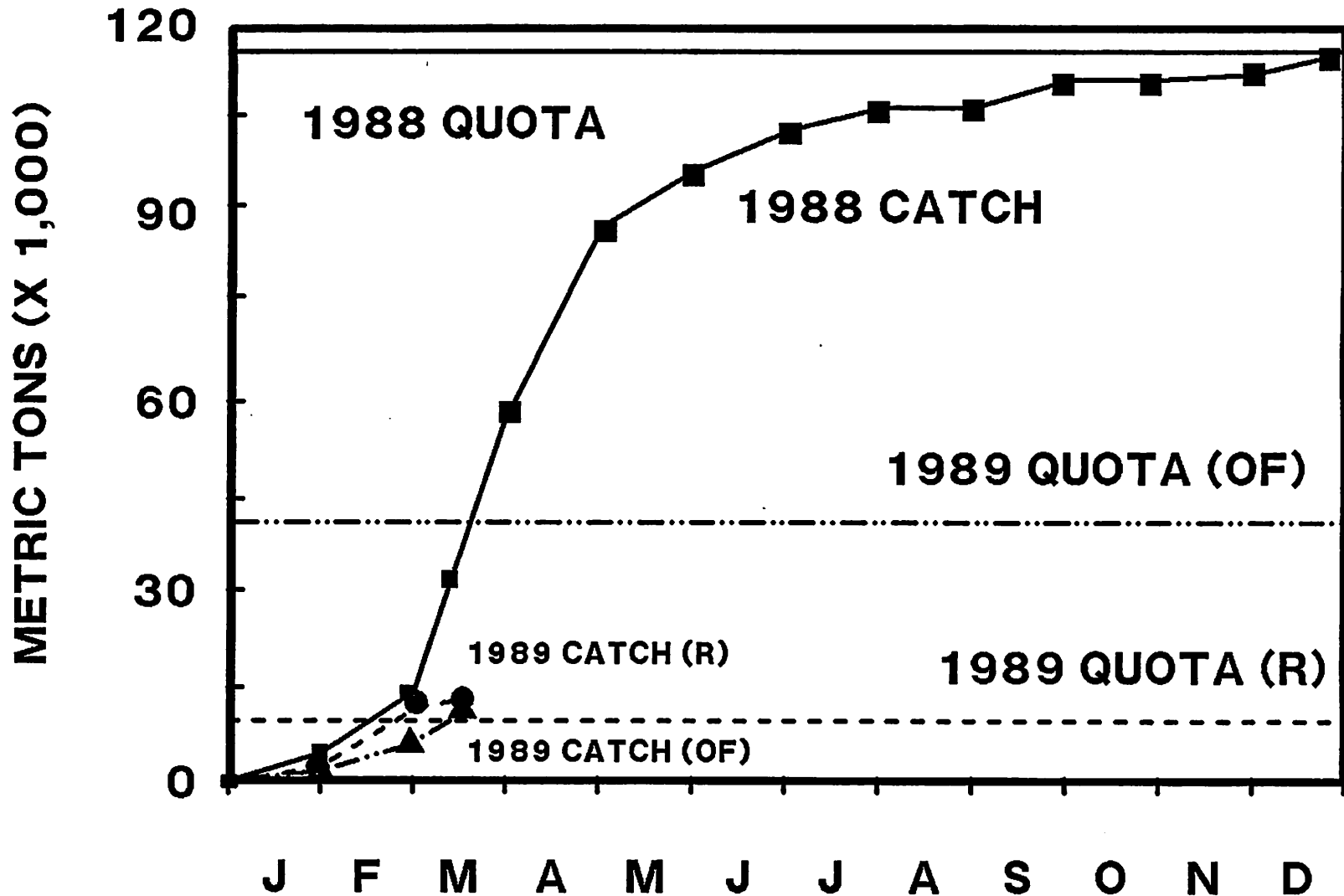
JVP CATCH

BSAI PACIFIC COD



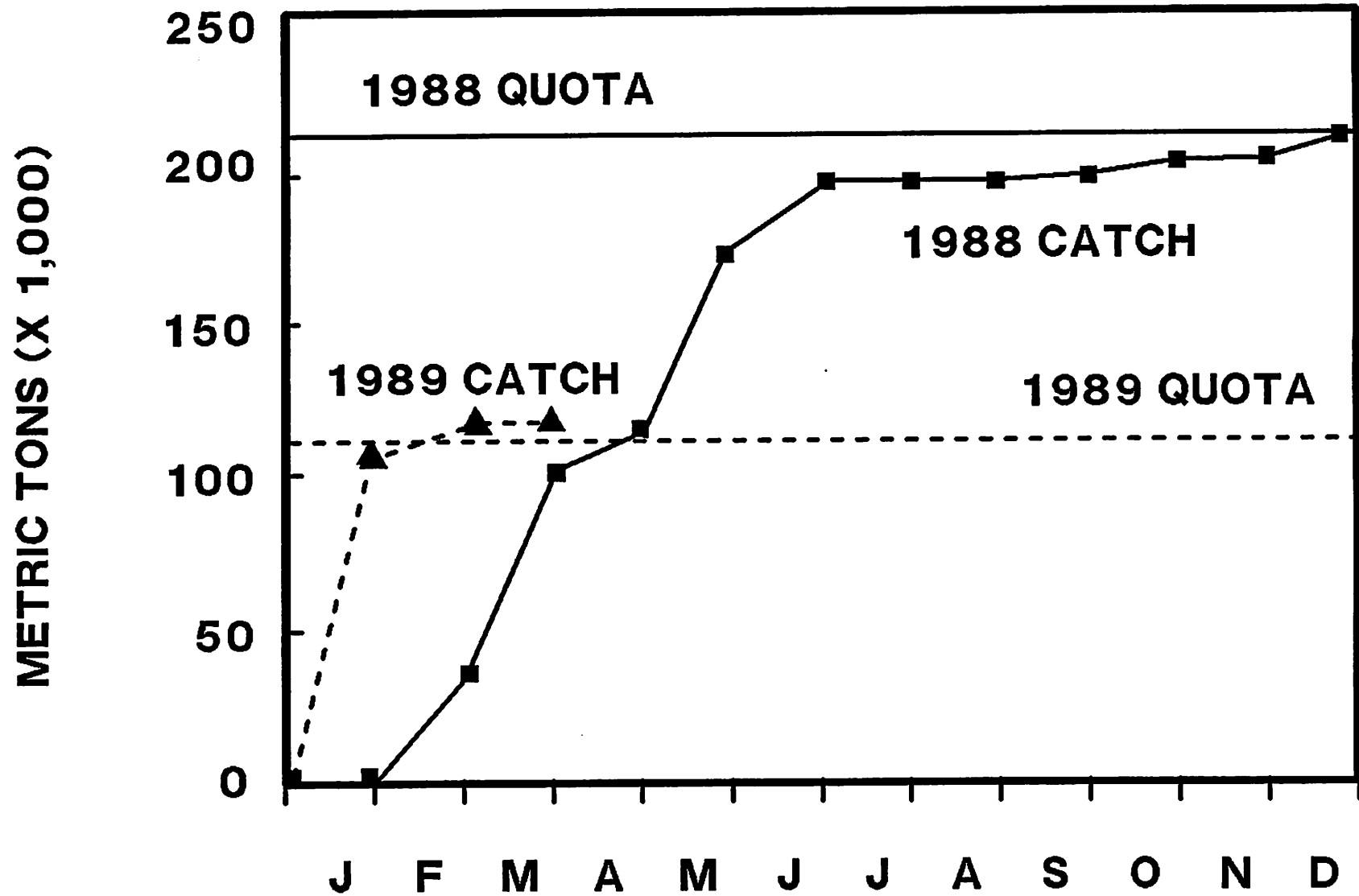
JVP CATCH

BSAI "OTHER FLATFISH" / ROCK SOLE



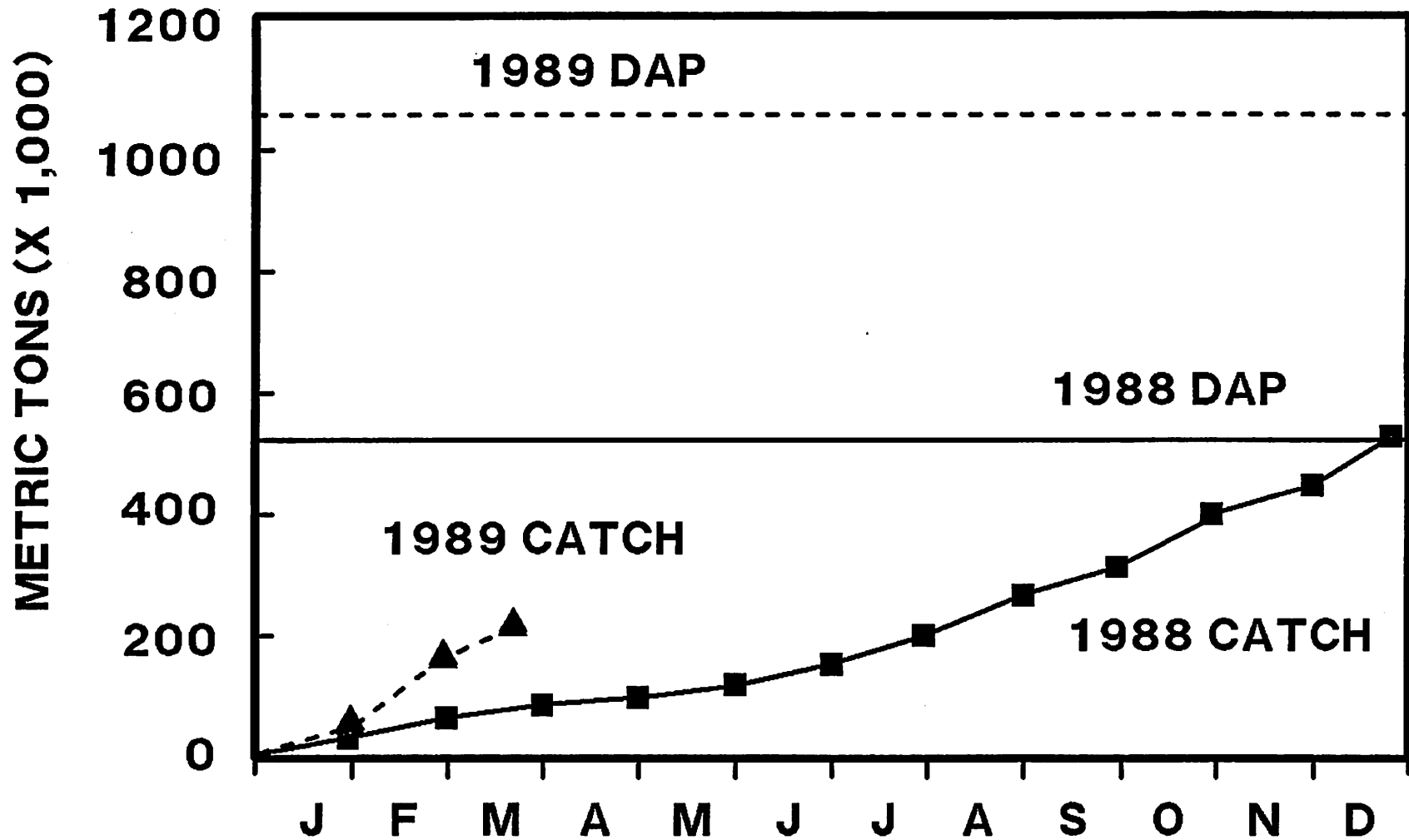
JVP CATCH

BSAI YELLOWFIN SOLE



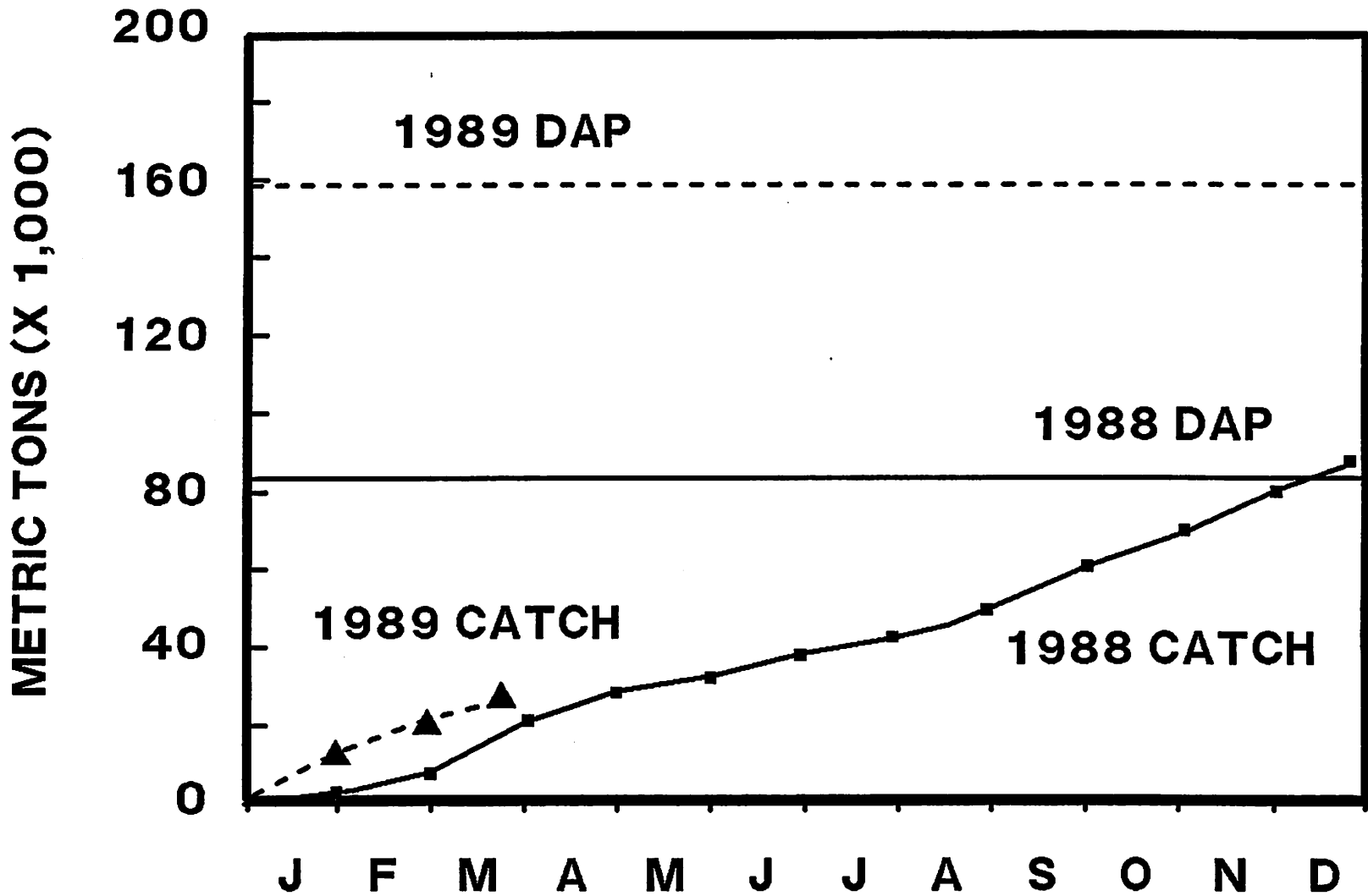
DAP CATCH

BSAI POLLOCK

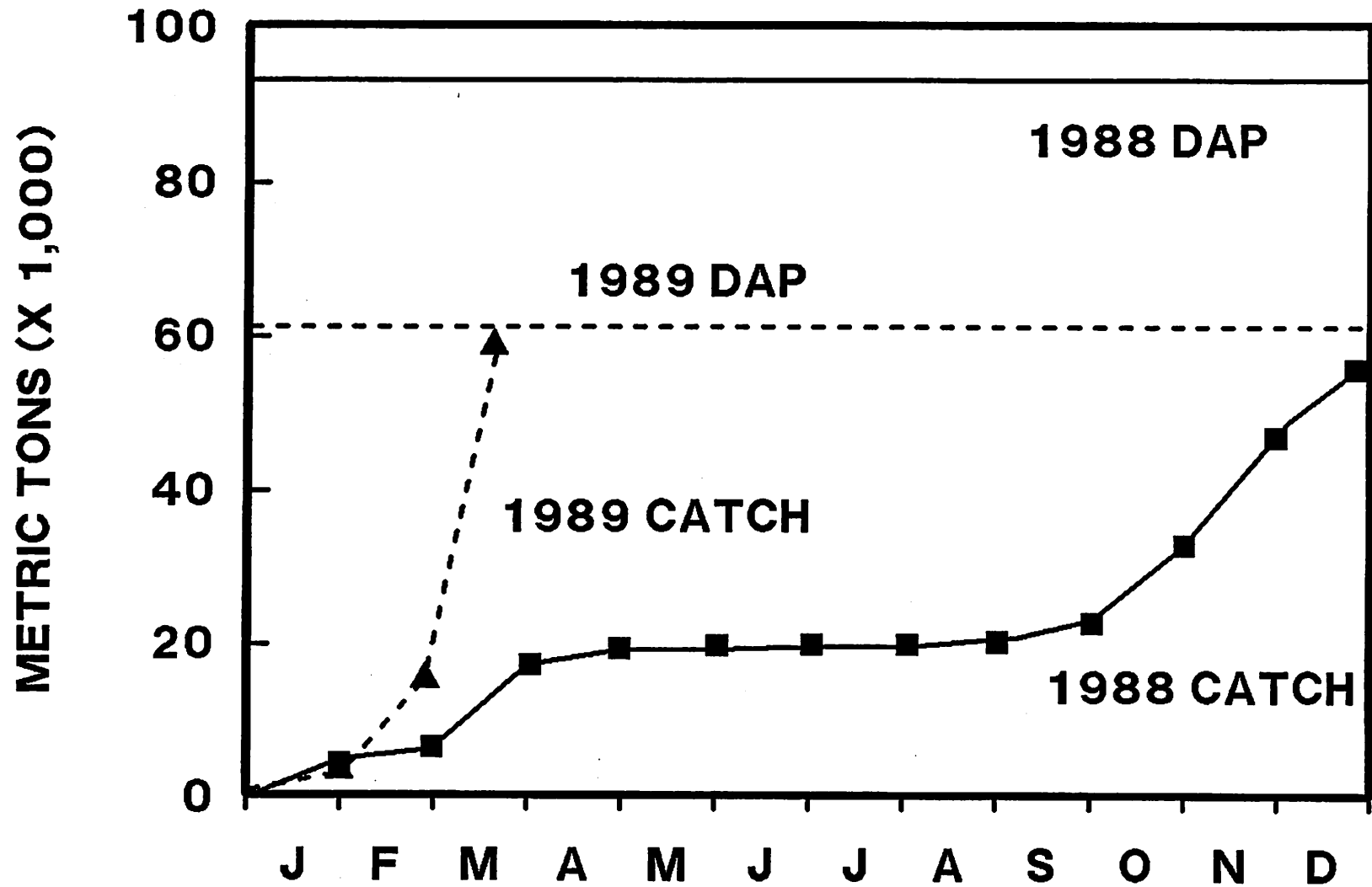


DAP CATCH

BSAI PACIFIC COD

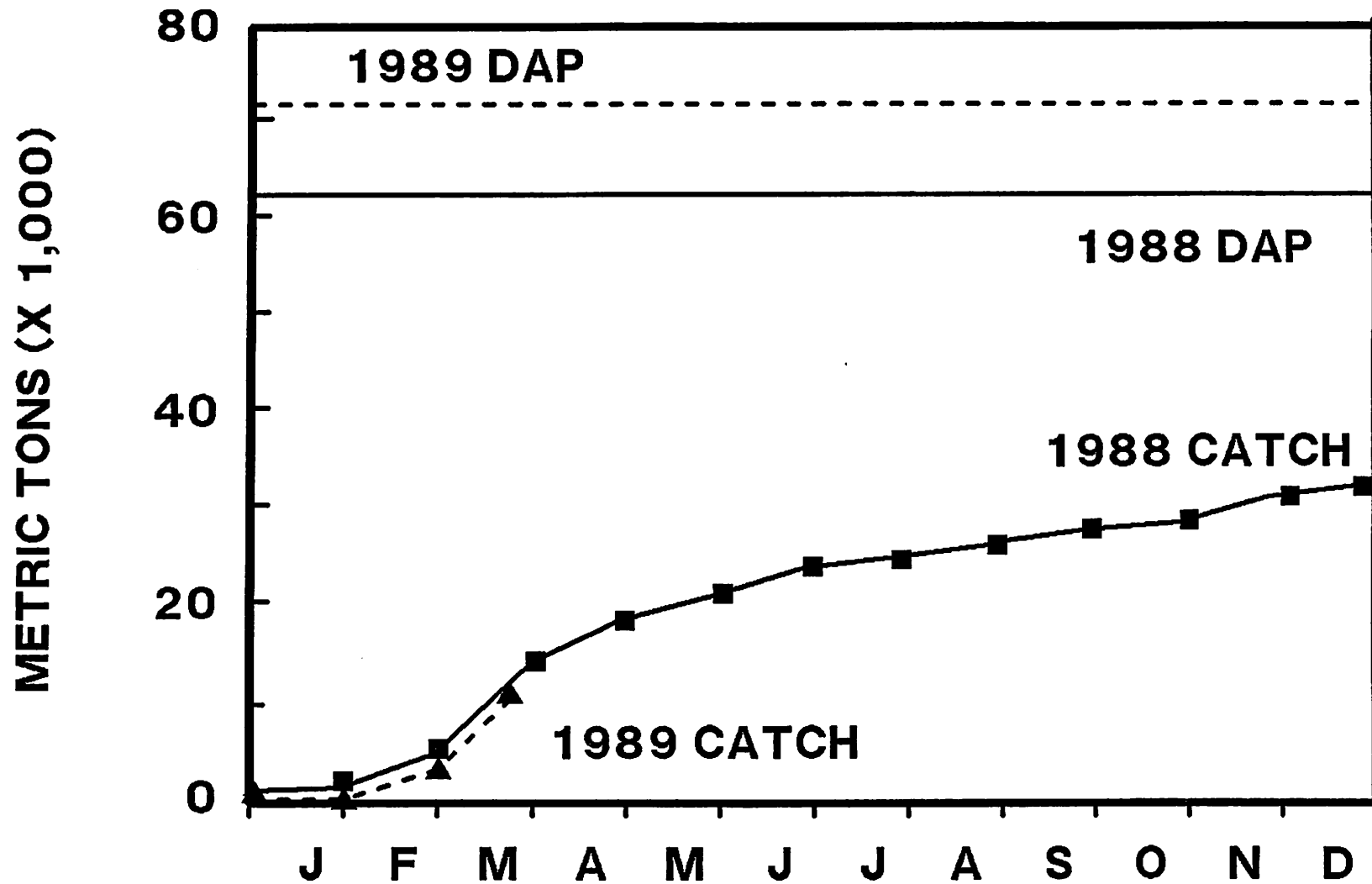


DAP CATCH GOA POLLOCK

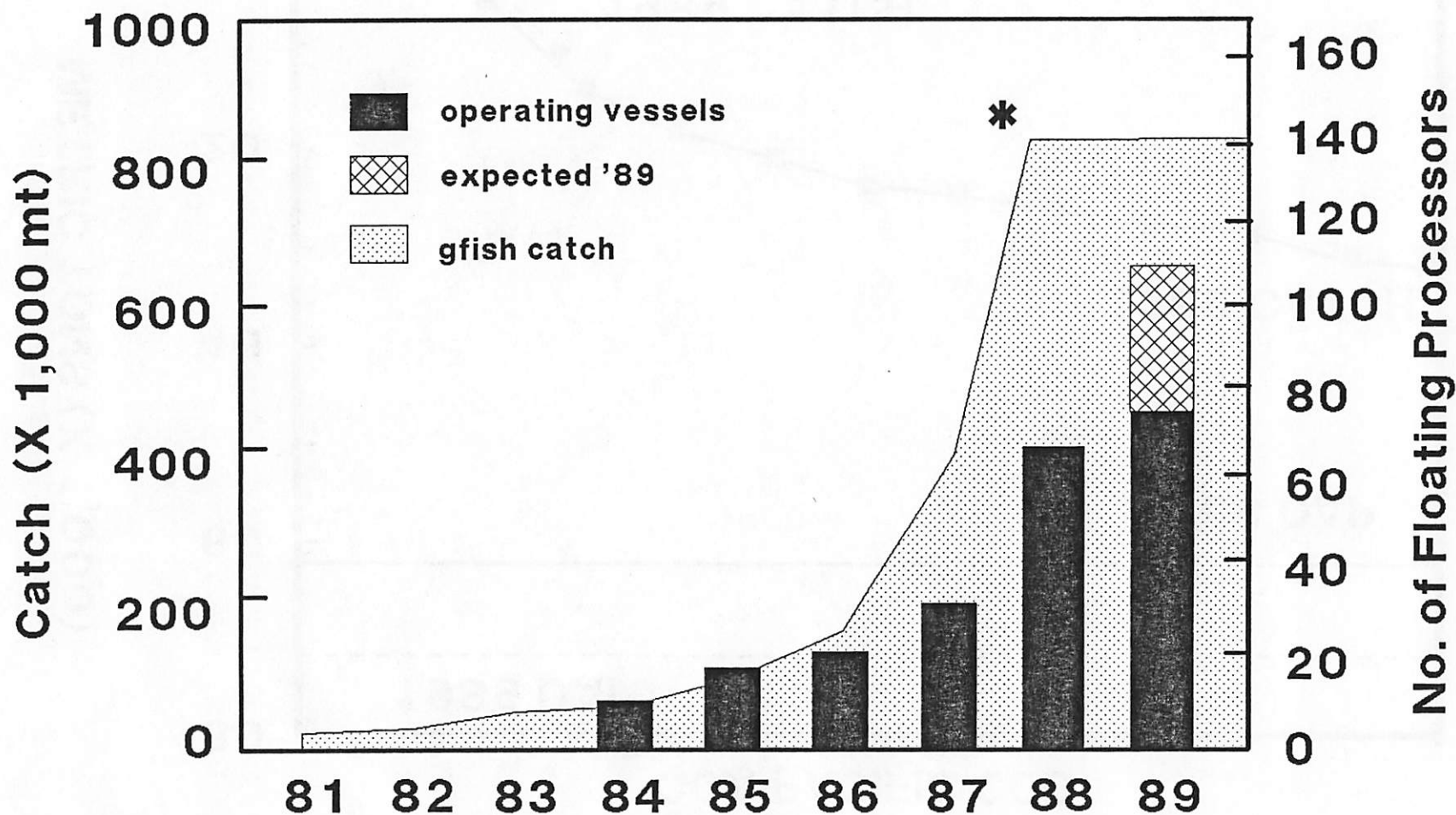


DAP CATCH

GOA PACIFIC COD



ALASKA DAP GROUNDFISH TRENDS



*

1988 catch through 12/31