

Groundfish Forum

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April 1, 2014

Mr. Eric Olson, Chairman
North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Re: Agenda Item C5, Amendment 80 Program 5-year review

Dear Chairman Olson,

Groundfish Forum represents five companies and sixteen vessels operating in the Amendment 80 (A80) sector of the Bering Sea/Aleutian Islands (BSAI) groundfish fisheries. Our members have a long history in what are now Amendment 80 fisheries, reaching back into the 1980's. They participated in many years of work to rationalize these fisheries through the Council process, helping to create what is now an undeniable success story for the NPFMC. We are writing you to highlight the improvements that have resulted from Amendment 80, and recommend no changes to this highly successful program.

The primary goal of the Council in developing Amendment 80 was to "...improve retention and utilization of fishery resources by the non-AFA trawl catcher processor fleet."¹ Amendment 80 was implemented in 2008 and immediately proved a success in meeting this goal. The motivating factor changed from 'dollars per day' to 'dollars per fish,' with stable allocations allowing vessels to fish more selectively and to respond to changes in the fishery immediately, on the grounds, to maximize retention while minimizing PSC use. By 2010 the fleet was already surpassing the highest retention level mandated under Amendment 79 (the 'Groundfish Retention Standard,' or GRS), and the Council subsequently repealed the GRS as unnecessary and unenforceable. The fleet has stayed below the PSC allocations, even though they are significantly lower than pre-Amendment 80 history.

The numbers tell the story.

2004 (Most recent year considered when developing the GRS):

Total round weight equivalent of retained groundfish²: 202,000 metric tons

Retention³: 67.4%

Halibut PSC mortality⁴: 2,770 metric tons

2012 (most recent combined cooperative report data):

Total round weight equivalent of retained groundfish⁵: 315,453 metric tons

Retention⁶: 94.6%

Halibut PSC mortality⁷: 1,945 metric tons

¹ Amendment 80 final rule 72FR 52668, September 14, 2007

² Amendment 79 EA/RIR/IRFA, July 2005

³ Ibid.

⁴ "A Quantitative Examination of Halibut Mortality in BSAI Groundfish Fisheries," Northern Economics, 2014, Tbl 8

⁵ Alaska Groundfish Cooperative and Alaska Seafood Cooperative annual reports, 2012

⁶ Pers. comm, Beth Concepcion, Alaska Seafood Cooperative

The cooperative structure implemented under Amendment 80 encourages fishermen to work together and share information on and off the fishing grounds. It has also provided a structure for experimentation with gear and fishing techniques that was not realistic in a race for fish. Modified flatfish trawls have reduced bottom contact by 90%, excluder devices have been refined, and vessels can choose not to fish at higher-bycatch seasons or times of day. The cooperative also functions as an entity to work with local communities to address specific concerns in particular areas quickly.

The Amendment 80 sector is now recognized as a responsible, innovative and proactive group of fishermen operating in a healthy and sustainable way. This is reflected in fisheries certified as sustainable by both the Marine Stewardship Council (MSC) and the Responsible Fisheries Management program (RFM).

These improvements have been achieved in spite of numerous confounding factors. All of the allocations, both directed and for PSC, are hard caps; reaching any one of the numerous caps would close a coop or limited access down for the rest of the year in all fisheries. Amendment 85, which was implemented concurrently with Amendment 80 in 2008, reduced the sector's access to Pacific cod by over 30% (from a 2007 harvest of around 20% to an allocation of 13.4%)⁸. This effectively eliminated the directed cod fishery for these vessels, as the allocation had to be reserved to cover incidental catch in other fisheries and cod became a more limiting species than halibut. Steller Sea Lion protection measures in the Aleutian Islands eliminated a large part of the Atka mackerel fishery in 2010. Vessels which depended on mackerel were displaced into Bering Sea fisheries that are more halibut and cod-intensive. The reduced PSC caps forced vessels to move frequently to avoid halibut and crab.

We anticipate further success in the future as actions already taken by the Council come into place. The ability to replace vessels contained in Amendment 97 has spurred progress in new vessel construction, which will bring a higher level of processing and more environmentally friendly operations. Flatfish flexibility, approved in 2013 but not yet implemented, will facilitate a more complete harvest of flatfish allocations as species can be traded from one allocation to another. Deck sorting for halibut, under consideration at this time, could significantly reduce halibut mortality.

In summary, Amendment 80 is a success story for the North Pacific Council and for the head and gut sector. Even with restricted access to Pacific cod, reduced bycatch caps, and severe dislocation of vessels caused by Steller Sea Lion protection measures, the sector has met and exceeded the expectations of the Council. Retention is well over 90% (above the highest level of the GRS), PSC catch is reduced, markets have been developed for new species such as Alaska plaice and arrowtooth flounder, and fisheries are open from January 20 through the end of December. Construction is beginning on new vessels, and research is continuing on gear innovation and improved processing and handling techniques. The fleet has been able to respond to new regulations and restrictions through the flexibility provided by the cooperative structure.

Amendment 80 has met and exceeded the goals set forth by the Council. We appreciate the chance to highlight the success of the program, and look forward to continuing the program without significant changes.

⁷ "A Quantitative Examination of Halibut Mortality in BSAI Groundfish Fisheries," Northern Economics, 2014, Tbl 8

⁸ Amendment 85: 72FR 60283, October 24, 2007

We end with a few quotes from Amendment 80 captains:

"Prior to rationalization, captains were very hesitant to leave profitable grounds with high PSC to go looking for cleaner areas. With the entire fleet working from one quota for PSC, going searching was often deemed too great a risk. Individual vessel accountability has eliminated this flaw, which was the primary shortcoming of the old system."

"The co-op has given us much better communications between vessels on the grounds. This is critical to decision making for where and when (day/night) to fish in certain areas. This helps us to move to higher CPUE grounds and avoid some of the stumbling blocks to finding cleaner fishing. This communication goes further by allowing the captains to try and report different configurations of nets and excluders in real time, on the same fishing areas."

"Having the ability to fish when and where it makes sense has empowered captains to make good fishing decisions and dramatically reduce our halibut catch and the catch of other limiting species."

"Having our own quotas has enabled us to make significant improvements to our vessels because time lost on the grounds does not result in a complete loss of opportunity (as it did pre-A80). We can take the time to make improvements now because we can fish our quota later in the year, on another vessel, or lease it to another entity without fear that the fishery will close or that someone else will catch our fish."

Thank you for the chance to comment.

Sincerely,



Lori Swanson
Executive Director