


MEMORANDUM

TO: Council, AP and SSC Members

FROM: Clarence G. Pautzke 
Executive Director

DATE: June 13, 1990

SUBJECT: Inshore-Offshore Allocation

ACTION REQUIRED

Receive status report on analysis and Committee recommendations. Review schedule and provide guidance to analytical team.

BACKGROUND

In April the Council finalized its inshore-offshore problem statement and management alternatives and approved working definitions and assumptions for the analysis. The analytical team met on May 8-9 to review progress on the economic and social impact components of the analysis. Consultants have been hired to provide economic and social expertise. Their work, outlined in items C-6(a-d), is proceeding satisfactorily. However, data collection is not.

The team was directed in April to prepare a comprehensive survey to collect economic information from all sectors of industry. They met with Council members and industry representatives to assure that the questionnaires were clear and complete. The survey was submitted to Washington, DC on May 21 for NOAA and OMB review and approval. This will be a lengthy process.

On May 25, the Fishery Planning Committee reviewed progress on the inshore-offshore analysis (C-6(e)) and the industry survey. The Committee was told that the OMB process may delay Council receipt of the finished analysis until April 1991. The fishing industry has volunteered to write letters to NMFS encouraging an expedited review of the survey. The Fishery Planning Committee will meet on July 18-19 in Juneau to review progress on the inshore-offshore analysis and continue work on a community development quota system for groundfish.

ARTICLE I - OBJECTIVES AND STATEMENT OF WORK

Objective

To develop reasonable approximations of the fixed and variable cost components, changes in labor utilization, and the impacts of harvesting and processing activities on key ports.

Statement of Work

- (a) Basic data review and consultation: This will involve working with NMFS staff, Alaska Sea Grant, and industry personnel to assess final data requirements for the model and to review what is currently available and what data must be collected.
- (b) Consultation on cost and budget data as well as basic inventories of key operations: This will involve working with NMFS staff and industry personnel to test and confirm data output from Ingolfur Arnarson's modeling efforts and to determine the vessel and processors classification structure (once a classification has been determined, it will be necessary to inventory each group for each port in the model).
- (c) Design and construct revised computer model: This includes an operating manual and a one day seminar in Seattle for NMFS staff. It also assumes working with key NMFS staff during the development of the model.
- (d) Additional IMPLAN I/O runs and construction of Alaska final demand matrix: Although they have IMPLAN computer output from previous modeling work, this model will require several additional runs.
- (e) Analysis and write-up of alternative scenarios: Work will include working with NMFS and Council staff to develop, analyze, and write-up alternative allocation scenarios. It will also include data review and adjustments for the model runs.

Key Ports to be included in the analysis include:

Kodiak	Akutan	Dutch Harbor	Washington
Sand Point	King Cove	St. Paul	Oregon
Sitka	Petersburg	Homer	Seward
Cordova			

ARTICLE II - PROJECT SCHEDULES AND DELIVERABLES

<u>Date</u>	<u>Event</u>
June 1, 1990	Design and Construct revised computer model; Additional IMPLAN I/O runs and construction of Alaska final demand matrix
June 30, 1990	Basic Data Review and Consultation
July 31, 1990	Consultation on cost etc
August 15, 1990	Analyze and write-up of alternative scenarios
August 31, 1990	Final Report



EXECUTIVE DIRECTOR
GUY N THORNBURGH

PACIFIC STATES MARINE FISHERIES COMMISSION

2501 S.W. FIRST AVENUE, SUITE 200, PORTLAND, OREGON 97201
PHONE (503) 326-7025 FAX (503) 326-7033

Contract No. 90-29

This agreement is between Mr. Ingolfur Arnarson and the Pacific States Marine Fisheries Commission (PSMFC) for providing economic analysis and modelling the impacts of inshore-offshore allocations in the groundfish fisheries off Alaska.

Services Rendered

Mr. Arnarson will:

1. Prepare a model which simulates the industry's economic behavior, which will include a Linear Programming component, based upon his fisheries economics work at Oregon State University dealing with the groundfish fisheries of the North Pacific and Bering Sea, and similar modeling he has done for Norwegian and Atlantic Canadian fisheries.
2. The model should include elements which characterize the economic and operational performance (described below) of each of five sectors of the DAP groundfish industry, identified within the analysis, under the prevailing "status quo" condition. These sectors are:
 - a. Catcher vessels delivering unprocessed fish to either inshore or offshore processors.
 - b. Catcher/processors.
 - c. Motherships.
 - d. Inshore "permanently moored" floating processing plants.
 - e. Onshore processing plants.

(Categories a and b must include both trawl and fixed gear (longline, pot, etc.) components.)

3. The model should allow "prediction" of economic and operational performance, by sector, by area, on a monthly (or at a minimum, quarterly) basis, in the following terms:
 - a. Maximization of revenues (gross minus variable costs, net)
 - b. Product mix.
 - c. Employment (labor demand by product output)
 - d. Simulate (predict) production cost relationships
 - e. Sensitivity to input and output price signals (output price response would be dependent upon work done by others, e.g., grad student, but should be potentially integrated into the model). The behavior of each DAP sector must reflect the simultaneous activities of all of the others.

4. Having characterized the status quo, simulations will be performed for each of the proposed alternatives which will "predict" the probable reaction (as measured by the economic and operational variables of the simulation) of each sector to inshore-offshore policy changes.
5. All work will be done in close coordination with the inshore/offshore technical team and it is expected that by the end of the contract, selected members of the technical team will be fully familiar with the workings and maintenance of the model to use it as a tool on other groundfish problems in the future. Mr. Arnarson will deliver a computer model in suitable format to the contractor.

Schedule

Mr. Arnarson will commence work on or about March 15, 1990. He is encouraged to attend the North Pacific Fishery Management Council's Fishery Planning Committee meeting on March 16 in Seattle, Washington.

Mr. Arnarson will work in cooperation with Dr. Lewis Queirolo of the NMFS AFSC who is the section leader for the economic component of the inshore-offshore analysis. The work will extend for about three months ending on or about June 15, 1990. It is expected that Mr. Arnarson will program and test the model in the first two months and that data inputs and results will occur in the third month. It is expected that to meet this schedule an assistant programmer will be made available to work with Mr. Arnarson.

Mr. Arnarson will produce a written report on his model and results for integration into the overall economic study. This report must be available in draft form by 1 June 1990 allowing time for editing final approval by the end of the contract.

AGENDA C-6(c)
JUNE 1990



PACIFIC STATES MARINE FISHERIES COMMISSION

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EXECUTIVE DIRECTOR
GUY N. THORNBURGH

May 15, 1990

Impact Assessment, Inc.
Contract 90-46

This agreement is between Impact Assessment, Inc. and the Pacific States Marine Fisheries Commission (PSMFC) for providing social impact analysis of impacts of inshore/offshore allocations in the groundfish fisheries off Alaska.

Social impact assessments are the product of analyses of the social consequences of projects or policies. The purpose and logic of the analyses are the same as those for the other elements of the environmental impact analysis: to determine (social) conditions in areas likely to be affected by the planning or policy-making proposed, to project future (social) effects of current management actions, and to estimate the (social) effects on a local, regional, and national scale if various management alternatives are implemented.

Services Rendered

Impact Assessment, Inc. will:

Phase I

1. Prepare secondary data profiles of six regional communities (St. Paul, Dutch Harbor/Akutan, Sand Point, Kodiak, AK; Seattle/Ballard (or Bellingham), WA; and Newport, OR).
2. Prepare an indepth social profile of the Kodiak community which will include: a detailed demography of the community, its people, industry, and social and cultural factors.

This social impact analysis will be conducted in three phases, which are dependent on funding. Phase I includes the preparation of six outline community profiles as defined by the North Pacific Fishery Management Council's analytical team. It also includes preparation of an indepth profile of one community and initial development of a "baseline" database for analysis.

Phase II will encompass the preparation of five other indepth community profiles and completion of a "baseline" database for analysis. Phase III, will include community impact analysis of the inshore/offshore management alternatives as defined by the North Pacific Council. The combination of these three phases will result in a comprehensive social impact analysis of the inshore/offshore issue as well as a social impact database that could serve the Council's needs in future allocative and limited access projects.

Should additional funding become available the following services will be rendered:

Phase II

3. Prepare indepth community profile for St. Paul, Dutch Harbor/Akutan, Sand Point, AK; Seattle/Ballard (or Bellingham), WA; and Newport, OR.
4. Complete social impact database for use by PSMFC or Council.

Phase III

5. Analyze social impacts of inshore/offshore management alternatives on identified communities.
6. Evaluate community impacts on a local, regional and national scale.

IAI will produce a written report on the social impact analysis for integration into the inshore/offshore amendment package. The written report should be available both in hard copy and in WordPerfect format.

Schedule

Impact Assessment, Inc. (IAI) will commence work upon approval of this contract. IAI will work with advice and guidance of Dr. Peter Fricke, of the National Marine Fisheries Service - Washington, D.C. Additional coordination and guidance will be provided by Mr. Steve Davis, of the North Pacific Fishery Management Council - Anchorage, AK. The following deadlines have been agreed upon (subject to available funding):

July 15, 1990	Phase I, item 1 due, (camera ready, plus 20 copies).
August 21, 1990	Phase I, item 2 due, (camera ready, plus 20 copies).
October 15, 1990	Phase II, five indepth community profiles due.
November 5, 1990	Phase III, draft analysis to Fricke/Davis for review and comment
November 10, 1990	Comments back to IAI.
November 15, 1990	Final analysis available for distribution to Council. (Camera ready, plus 20 copies).
December 5, 1990	Oral presentation of social impact analysis to Council family.

AGENDA C-6(d)
JUNE 1990

F/CM1: PHF: 427-2338: 2/27/90

Gulf of Alaska/Bering Sea Groundfish
INSHORE/OFFSHORE ALLOCATIONS PROPOSAL
Requirements for Social Impact Assessment

Introduction

The Magnuson Fishery Conservation and Management Act (MFCMA) of 1976, as amended, requires "the preparation and implementation, in accordance with national standards, of fishery management plans which will achieve and maintain, on a continuing basis, the optimum yield from each fishery" [MFCMA Sec. 2(b)(4)]. The Act defines optimum yield as "the amount of fish -

- (A) which will provide the greatest overall benefit to the Nation, with particular reference to food production and recreational opportunities; and
- (B) which is prescribed as such on the basis of the maximum sustainable yield from such fishery, as modified by any relevant economic, social, or ecological factor" [MFCMA Sec. 3(18)].

Congress chose this language in part to conform with the National Environmental Policy Act (NEPA) of 1969. NEPA requires Federal agencies to consider the interactions of natural and human environments, and the impacts on both systems of any changes. This is to be done through the use of "a systematic, interdisciplinary approach which will insure the integrated use of the natural and social and the environmental design arts in planning and in decisionmaking" [NEPA Sec. 102(2)(a)]. Environmental impact assessments thus are required to reflect ecological, economic, and social impacts of any Federal planning or rulemaking. In times when resources are abundant and all human uses can be satisfied without overexploiting the resource, impact assessments typically described impacts on the natural environment. As exploitation of the resource approaches maximum sustainable limits and allocation between human user groups becomes necessary, impact assessments are broadened to include full consideration of impacts on the human environment.

The MFCMA reflects this approach in its prohibition on overfishing standard [MFCMA Sec 301(a)(1)] and the fair and equitable allocation standard [MFCMA Sec 301(a)(4)]. Where a "system for limiting access to the fishery in order to achieve optimum yield" [MFCMA Sec. 303(b)(6)] is deemed necessary, the Act requires the Secretary and Council to consider the social and economic impacts of the system in depth. Specifically, an impact assessment of the following factors is required:

- "(A) present participation in the fishery;
- (B) historical fishing practices in, and dependence on, the fishery;
- (C) the economics of the fishery;
- (D) the capability of fishing vessels used in the fishery

- to engage in other fisheries;
- (E) the cultural and social framework relevant to the fishery, and
- (F) any other relevant considerations " [MFCMA Sec. 303(b)(6)].

In the case of the proposed "Inshore-Offshore Amendment", there is some evidence that allocation between user groups is necessary to prevent overfishing and provide for the fair and equitable distribution of benefits. For this reason, a full range of impact assessments - ecological, economic, and social - will be necessary to meet MFCMA and NEPA requirements.

Social Impact Assessment (SIA)

Social impact assessments are the product of analyses of the social consequences of projects or policies. The purpose and logic of the analysis are the same as for the other elements of environmental impact analysis: to determine [social] conditions in areas likely to be affected by the planning or policymaking proposed, to project future [social] effects of the current management actions, and then estimate the [social] effects on a local, regional, and national scale if various management alternatives are implemented. The analysis attempts to answer basic questions such as: who is affected? what will happen to those people affected by the proposed actions? why and where will they be affected? what will change under each alternative? how will any of the proposed changes affect social systems and the stability of these systems?

While economic impact analysis focuses on issues of economic efficiency and the distributional aspects of resource supply and demand, prices, and employment, social impact assessment considers the social and cultural aspects of changes in employment-unemployment, community and industry development. Both impact assessments are interrelated and share some overlapping socioeconomic data sets, but their foci are different and each adds to the decisionmaking information needed by a resource manager. The economic analysis is an efficiency analysis which asks how industry profits and costs will be affected. The social impact analysis explores the impacts upon people and communities affected by the management or policy decision. The bridging data sets, which form socioeconomic assessments to which both analyses contribute, examine the impacts upon employees of affected fishing industry operations and related infrastructure components. The relationship of these elements is shown in Figure 1.

Managing the SIA

The instinctive reaction of researchers is to gather as much data as possible; this is not necessary for the purposes of an SIA. To manage an SIA effectively, three principles should be adhered to. First, the focus should be on the major social

FIGURE 1.

The relationship of economic and social impact analysis

<u>Economic</u>	<u>Socioeconomic</u>	<u>Social</u>
* Types of inputs, outputs, & production processes	* Plan-induced changes in income, employment	* Demography of affected communities, people, industry
* Trends in commodity prices & costs of raw materials, labor	* Effect on business activity	* Cultural and social factors:
* Monetary & other benefits & costs, expressed as present net value	* Infrastructure capacity	- lifestyles
* Implied resource trade-offs of each alternative	* Resource & use trends	- norms, values
* Margins of profit for industry sectors in each alternative	* Labor force stability	- land/sea use
	* Extent of economically induced migration	- social system
	* Income distribution	- native Americans
	* Local revenue changes	* How proposed actions & their alternatives affect the above elements

issues revealed in the scoping process. These concerns and issues may be augmented by others discovered and considered during the analysis, but most anticipated social effects should be identified during the scoping process to target the analysis and reduce the need for additional exploration by the analysts.

Second, social effects variables should be sought in an analytic rather than encyclopedic manner. Information which directly represents the identified concerns and issues should be the focus of the data collection efforts. Too much data can overwhelm decisionmakers and analysts; an SIA is not a doctoral thesis or a license to hunt, and a bounded study will assist researchers and/or consultants in producing a timely and satisfactory SIA.

Third, before collecting new data, all existing data bases should be examined. Often data useful for fishery management SIAs is available in existing data bases gathered for other purposes. State and Federal census and survey materials on communities and regions is usually available, often with local interpretive analysis. Other environmental impact assessments, such as for oil development, will frequently yield important data sets. Literature reviews of research studies, biographies and histories will also yield much social information. Thus the idea should not be to gather as much new data as possible, but as little new data as necessary to fill lacunae in other studies and assessments and bring them up to date for the purposes of the SIA.

"trade-offs" are analyzed. The assessment is completed with the identification of the preferred alternative.

Sources of data.

If this SIA is to be completed in line with the Council's proposed schedule, the use of secondary and tertiary source data will be essential. Appropriate data bases include those of the Bureau of Census' decennial and quinquennial surveys of population, employment and industry; state surveys conducted for community development, labor statistics, health and human services, budget, and education purposes expand on the Bureau of Census material and provide local interpretation of trends.

Material with specialized relevance to fisheries includes that of the U. S. Minerals Management Services OCSEAP data base on oil development impacts projected for Alaskan communities. Alaska Department of Fish and Game has specialized data bases on commercial and subsistence fisheries by community and region, and like the U. S. Forest Service and the U. S. Park Service, has materials on recreational fishing. Coastal Zone Management land use plans, where available, provide another excellent source of information on marine related industry and employment. General literature reviews will produce community and regional studies by anthropologists, economists, geographers, and historians which have germane information. Studies commissioned by communities and community or regional organizations are also useful sources although they may have a "promotional" slant.

State and NMFS vessel licensing data and information about processing plants will provide some of the industry profile information. This material will also be used in the economic analysis. Production and product flow information in terms of seasonality and employment will need to be obtained from industry and community sources.

Approximate costs.

For a SIA to be available in August and based on secondary and tertiary source data, some six person-months of principal investigators' time will be needed. A guesstimate would suggest that salaries, overheads, etc. would cost some \$60,000. An additional \$7,000 for travel from Seattle or Anchorage to the sites at which data is kept will be necessary, and an estimated \$5,000 for computer and miscellaneous costs will be required. The total cost of such a study could be of the order of \$72,000.

Summary Report
Fishery Planning Committee
May 25, 1990

Alaska Fisheries Science Center
Seattle, Washington

I. INTRODUCTION

The meeting was convened at 8:35 a.m. by Chairman Joe Blum. Other members in attendance were Rick Lauber, Bob Alverson, Larry Cotter, Ron Hegge, and John Peterson. Support staff in attendance were Clarence Pautzke and Steve Davis, NPFMC; Jay Ginter, Lew Queirolo, Steve Freese, and Jim Balsiger, NMFS; and Craig O'Connor, NOAA-GC. There were also over 60 members of the public in attendance.

II. MORATORIUM

The FPC reviewed the draft Federal Register notice prepared by staff on the moratorium. The FPC made revisions to text listed under the section heading "The Problem" and "The proposed and possible alternative actions". Specifically, the changes addressed concerns with the term "overcapitalized", and the need to expand the pipeline definition to include those vessels in the process of sale or conversion at the time of the control date. Staff was directed to draft language and make other technical revisions as necessary to incorporate the FPC's recommendations.

The Committee briefly discussed the concept of applying the moratorium to all fisheries or some part thereof as later determined by the Council. The FPC highlighted this issue as one that should be addressed by the full Council as to whether it be included in the notice. The Committee also reviewed the Council's intended moratorium work schedule and recommended the addition of two NEPA scoping sessions in Seattle and Kodiak (with teleconferences) during the summer.

III. INSHORE/OFFSHORE ALLOCATION

The FPC received an update on the progress of the analytical team on the analysis. It was noted that with the generous contribution by industry to the Pacific States Marine Fisheries Commission, work can begin on the social impact analysis (SIA). Several members requested a review of the SIA outline and a better understanding of what information the analysis would provide to the Council. This issue was placed on the agenda of the next FPC meeting.

An update on the biological and economic analysis was also provided. Work is proceeding in developing the biological database and economic models. Concerns were expressed by both members of the analytical team and the committee over the inherent delays associated with the need to obtain NMFS, NOAA, and OMB approval of the industry economic survey. The delays might require rescheduling the amendment package deadline from December 1990 to April 1991. Chairman Blum volunteered to discuss this matter with the Alaska Regional Director and will provide further direction to staff on behalf of the committee as necessary.

The FPC received a copy of the Council's most recent statement of the community development quota concept and have scheduled discussion of this topic as it applies to inshore/offshore during its next meeting.

Several points of concern were raised to the FPC by members of the public.

- Some members questioned the need to include Pacific cod in the inshore/offshore analysis given that there is no current allocation problem with this fishery.
- Some members raised the issue of floating processing capacity (e.g., mothership or catcher/processor declaring its intent to participate as an "inshore" operator as defined by the Council). The fact that current committee rules would allow this mobile capacity to move anywhere in the Gulf of Alaska or Bering Sea/Aleutians, or the fact that it can transfer from inshore or offshore from year to year doesn't address the Council's stated preemption problem.
- Some members raised the issue of placing historical JV catches with the inshore category. They suggest limiting the focus of the analysis to the historical DAP sector only and should JV catches be incorporated, that it is more appropriate for them to be added to the offshore category.


The FPC has tentatively scheduled to meet next in Juneau, July 18-19.

IV. ADJOURNMENT

The Chairman adjourned the meeting at 2:40 p.m.

MEMORANDUM

TO: Council, AP and SSC Members

FROM: Clarence G. Pautzke
Executive Director 

DATE: June 19, 1990

SUBJECT: Inshore-Offshore Industry Projection Survey

ACTION REQUIRED

BACKGROUND

In April the Council directed the analytical team to prepare an industry-wide economic survey and submit it to NOAA and OMB for approval. This survey, which will eventually reach all participants in the groundfish fishery, provides basic economic information necessary for the regulatory impact analysis.

Another important piece of information necessary for analysis will be industry sector projections of future growth and development. The analytical team requests the Council's approval of an industry projection questionnaire that will be sent to industry associations or individuals representing the following sectors:

- hook and longline catcher vessels delivering to "inshore processors"
- pot catcher vessels delivering to "inshore processors"
- catcher vessels delivering to "offshore processors"
- catcher/processors, probably separately trawl and fixed gear
- motherships
- "inshore floating processors"
- onshore plants

These questionnaires will provide the Council and analysts with an indication of how various sectors expect to develop during the next three years. A list of associations will be developed at the meeting. It is anticipated that these associations will contact their members and other sector associations in providing the forecasts. A sample copy of a questionnaire is attached.

Section VI. Forward projection

Category: Catcher/Processor (Trawl)

Please provide your best projection for the following questions, for each year: 1991, 1992, and 1993. Assume that the groundfish fisheries in the EEZ off Alaska are managed under current (1989-1990) regulations (roughly the same levels of TACs, bycatch caps, etc.) with the addition of a ban on pollock roe-stripping.

- | | 1991 | 1992 | 1993 |
|---|------|------|------|
| 1. What will be the number of factory trawlers in the domestic groundfish fleet | | | |
| 2. The average length (LOA) of these vessels? | | | |
| 3a. Do you anticipate a change from current patterns with respect to target species? Indicate current target species. | | | |

	1991	1992	1993
Bering Sea/Aleutians			
Gulf of Alaska			

If switch is expected, please indicate new target species and note rationale for the anticipated switch.

Bering Sea/Aleutians

Gulf of Alaska

Rationale:

3b. Do you anticipate a change from current patterns with respect to product forms?
Indicate yes or no, by area.

1991 1992 1993

Bering Sea/Aleutians

Gulf of Alaska

If yes, please indicate the change and note rationale for the anticipated switch.

Indicate change and rationale:

4a. What are your current markets for pollock, Pacific cod, and other groundfish? List.

4b. Will there be a significant shift in the primary markets for groundfish as a whole?
Indicate yes or no.

1991 1992 1993

If yes, please explain the forecasted shift and rationale.

5. Do you expect any new machinery, gear, or other technological development coming on line that will improve the productivity or profitability of this type of operation? Indicate yes or no.

1991 1992 1993

If yes, please explain the anticipated change and its impact (ie. a new filleting machine that will increase throughput per hour by 10%).

6. If the pollock and cod fisheries in the EEZ off Alaska become unavailable to your type of operation in the future, what alternative will your sector choose? If different components of your sector are likely to pick different alternatives, please indicate what percentage of your type of operation would fall in each category.

1991 1992 1993

- a. Target another species within EEZ off Alaska
What species?

- b. Move to another ground
Where?

- c. Be unable to continue operations (bankrupt)

- d. Other

7. Do you anticipate a labor shortage? Indicate yes or no.

1991 1992 1993

8. From what state or area do you anticipate most of your future harvesting/processing crews will come?

1991 1992 1993

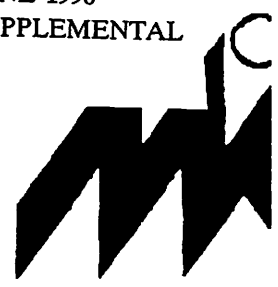
Comments on labor availability.

9. Are there any other nonmanagement changes that you anticipate occurring within the next 3 years within these fisheries, assuming current management continues, that you would like to address? Please use additional sheets if necessary.

JUN-19-90 TUE 15:13

JUN-19-90 TUE 12:42 McKNIGHT and COMPANY

AGENDA C-6
JUNE 1990
SUPPLEMENTAL



FOR IMMEDIATE RELEASE
June 19, 1990

FOR MORE INFORMATION, CONTACT:
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**INSHORE HARVESTERS AND PROCESSORS DENOUNCE LATEST
PROPOSAL BY FACTORY TRAWLER GROUP**

In a move to protect the rights of the North Pacific in-shore groundfish fishery, the North Pacific Seafood Coalition has denounced a recent recommendation made by the Alaska Factory Trawler Association (AFTA) to the North Pacific Fishery Management Council. Under the recommendation proposed by AFTA, the Council would exclude the catch history of former joint venture fishing vessels when determining groundfish allocations.

"If the Council takes this recommendation seriously, these fishermen might as well tie up their boats," said John Iani, a spokesperson for the North Pacific Seafood Coalition. "Right now, 80 percent of these smaller boats are delivering to in-shore plants. If their catch history is given to off-shore interests, or not considered at all, these catcher vessels and the in-shore processors they sell to will be seriously affected."

Recommendation Denounced
Page 2

In a letter sent to the North Pacific Fishery Management Council, AFTA has asked the Council to base its groundfish resource allocations on the 1989 domestic processors fishery (DAP), without taking into account the catch history of the former joint-venture harvesters.

If this method of allocation is adopted, these U.S. catcher vessels would be excluded from future participation in the North Pacific groundfish fishery, the Coalition maintains.

"Our boats were built in America and are owned and crewed by U.S. citizens. We pioneered the North Pacific groundfish fishery," asserted Doug Gordon, executive director of the American High Seas Fisheries Association, and member of the North Pacific Seafood Coalition. "The factory trawlers would be happy to see us go, but we refuse to give up our historical percentage of the catch."

The Council is also considering another alternative, which the North Pacific Seafood Coalition supports.

This alternative would include dividing the joint venture catch history according to a review of the fishery from 1986 to 1989. Under this plan, 80 percent go to the in-shore interests and 20 percent to the off-shore interests.

Recommendation Denounced
Page 3

"Because 80 percent of the harvesting vessels deliver their catch to in-shore plants, this alternative makes perfect sense," said Iani.

The North Pacific Seafood Coalition is an organization of in-shore fishermen and processors from Alaska, Washington, Oregon and California. They have joined forces to seek the equitable allocation of the North Pacific groundfish resource between the in-shore catcher vessels and the off-shore industrial factory trawler fleet. Members of the Coalition include the American High Seas Fisheries Association, Fishing Vessel Owners Association and the Pacific Seafood Processors Association.