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December 2, 2014

Chris Oliver

<<<<letter sent via email>>>>

North Pacific Fisheries Management Council

605 West 4<sup>th</sup> Avenue, suite 306

Anchorage, Alaska 99501

Dear Chris,

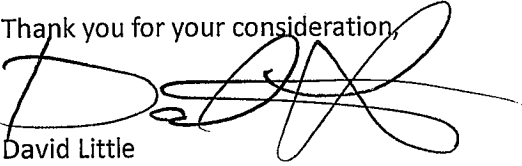
I am writing today to comment on agenda item C7 and the "C7 Vessel Cap Discussion Paper." I previously requested a change to the IFQ program in a letter dated in 2009. In my 2009 letter (and again in the discussion paper), I requested that the "ownership cap" be raised. The proposal from 2009 was amended by the IFQ Committee to request a change in the "Vessel IFQ Cap." A discussion of this change is outlined in the introduction of the paper.

As stated back in 2009, the reason for this request to the Vessel IFQ Cap is to improve the efficiency of a freezer longline (FLL) vessel participating in the Sablefish fishery. When this program was first implemented there was a recognition that there are different size vessels participating in this fishery and that a small portion of the fleet was processing their catch onboard the vessel. One of the goals of this program was to maintain the historical make-up of the harvesting sector. "A" shares were created to allow the larger vessels that had been processing and freezing their catch at sea to continue this practice.

Another objective of the IFQ program was to prevent over consolidation; with regard to Sablefish, the vessel cap was set at 1% of the overall Sablefish TAC. From the beginning of the program, this cap has been overly restrictive for a FLL vessel; this cap only allows most FLL vessels to make a partial trip before reaching the cap. Freezer longline vessels by design are larger than most other Sablefish boats; the smaller vessels in this class hold around 250,000 pounds of finished product and medium size vessels hold 500,000 pounds finished (H&G). Recovery rate from round to H&G is 63%; making this year's vessel cap about half a trip for the smallest vessels and one fourth of a trip for medium size boats. What we are asking for is to raise the cap to at least make one full trip for most boats.

This requested action is only for Sablefish "A" shares. Section 3 of the paper considers different options in table 6. This action is only for: "Sablefish IFQ," "just Sablefish A shares," and "all areas" and would "increase the percentage of the vessel IFQ cap." Only vessels that have all "A" shares would be affected. If a vessel has other classes, such as B, C or D, they would not qualify. This action is to promote efficiency for the freezer longline fleet, not to increase harvest for other classes.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read 'David Little', written over a horizontal line.

David Little

Clipper Seafoods, Ltd.