

APPENDIX E Sept. 1977



DEPARTMENT OF STATE

Washington, D.C. 20520

BUREAU OF OCEANS AND INTERNATIONAL
ENVIRONMENTAL AND SCIENTIFIC AFFAIRS

September 15, 1977

Mr. Elmer Rasmuson
Chairman
North Pacific Regional
Fishery Management Council
P.O. Box 3136 DT
Anchorage, Alaska 99510

Dear Mr. Rasmuson:

Enclosed for your information is a copy of a document containing the comments of the Government of Japan on the draft fishery management plans for 1978. The Japanese comments were formulated after meetings at which they were informed of the contents of the draft plans.

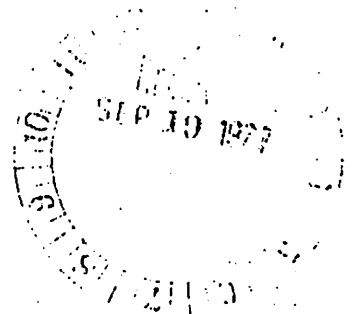
You are free to make this document available to the members of the Council, or to other interested parties as you feel it is appropriate.

Sincerely,

A handwritten signature in cursive script, appearing to read "Larry L. Snead".

Larry L. Snead
Acting Director
Office of Fisheries
Affairs

Enclosure:
As stated.



COMMENTS BY THE GOVERNMENT OF JAPAN ON THE DRAFT
PROPOSALS OF FISHERY MANAGEMENT PLANS FOR 1978

August, 1977.

Comments by the Government of Japan on the Draft
Proposals of Fishery Management Plans for 1978

At the time of the Meeting held between Japanese and United States scientists at the Northwest and Alaska Fisheries Center in Seattle from July 5 to 8, and of the Japan-U.S. Consultations held in the Department of State in Washington, D.C. on July 22 and 23; the Government of the U.S. orally presented to the Japanese side the outline of the draft proposals of the Fishery Management Plans for 1978 on which the Japanese side expressed, for its part, its views in the form of detailed oral explanations. We are deeply appreciative that the U.S. side gave us opportunities for such Meeting and Consultations before the contents of these proposals were made public and were conveyed officially to the Government of Japan.

The following comments, which the Government of Japan presents, are intended to confirm, supplement and simplify the remarks of the Japanese side made during the above Meeting and Consultations. It is our earnest hope that the Government of the United States take fully into consideration the following comments as well as those comments which might be presented later, depending on future development, in its finalization of the Draft Proposals of the Fishery Management Plans for 1978.

tons. Their estimate is much on the conservative side, since the efficient use of the resource could be achieved by admitting the Catch of all *C. bairdi* with carapace width of 123 mm and over. The latter case would result in 71,750 metric tons of the ABC, whereas the planned U.S. catch in 1978 is 29,500 tons.

(c) In the light of the above, it is irrefutable that there is a tremendous surplus in the resource of *C. bairdi* over and beyond the maximum capacity of the U.S. fishermen.

(2) It is highly unreasonable to define the OY at the same level as the maximum capacity of the U.S. fishery, since such an arbitrary definition is in sheer contradiction with the concept of the rational utilization of the resource.

(3) There are other aspects in the proposed expansion of the closed area which we consider unfair to our fishermen, such as the following:

(a) Japan is the only market for Tanner crabs, and the overwhelming bulk of U.S. catch comes to Japan.

(b) As the results of the past bilateral negotiations, Japan has already yielded to the U.S. the bulk of the best fishing grounds. There is no gear conflict with the U.S. pot fishery in the present Japanese fishing grounds.

(c) Since *C. bairdi* crab is much larger in size and bids much higher price as compared with small *C. opilio* crab, and since the southern region is much more prolific than the northern region, the proposed expansion of the closed area would give the U.S. fishermen a monopolistic harvest of high-priced *C. bairdi*, while the Japanese fishermen are forced to struggle in the unexperienced and infertile fishing grounds in the north in search of less valuable *C. opilio*. We do not consider this kind of competition fair or equitable, or in conformity with the intent of the U.S. PL 94-265.

(4) The fishing operation in the area north of 58 N would entail the following practical difficulties:

(a) Distribution of *C. opilio* is much more sparse in this area as compared with the area to the south.

(b) The drifting ice would completely block the operation from early spring through late April. Fishing in May may very well be hampered.

II. Ground fish

2. Pollock in the Bering Sea and the Aleutian area

We propose for the reasons as stated below that the TAC for this resource for 1978 be no less than 950,000 metric tons of the TAC for this year.

(1) Upon the detailed analysis on the changes in the abundance of this resource in recent years up to 1975, Japanese scientists estimated the sustainable yield (SY) to be in excess of 1.1 million metric tons. The methods and results of their analysis are described in a paper submitted to the 1976 annual meeting of the INPFC.

(2) The results of the 1975 and 1976 fishery appear to confirm the validity of this estimate. Namely, with the total combined catch of 1.27 million metric tons in 1975 by the Japanese, Korean and USSR fleets in the region, the CPUE of the Japanese fleet in 1976 remained practically at the same level as in the previous year. (Catch per hour of Japanese trawling in 1976 stood at 9.28 tons as against 9.47 tons in 1975.)

Furthermore, the CPUE of the Japanese fleet for the first-half of 1977 was higher than for the same period of 1976 with a total combined catch of 1.2 million metric

tons by the three countries in 1976.

(3) United States scientists are in favor of reducing the TAC for the coming year to 850,000 tons. While they estimate SY in recent years at one million metric tons, they consider this reduction necessary to restore the stock to the MSY level. In further reinforcement of their viewpoint, they predicted the decline of the abundance of the stock both in 1977 and 1978 due to the termination of the strong contribution of the 1972 year class. However, their forecast did not materialize, at least insofar as the first half of 1977 was concerned. As described in (2) above there has been improvement in the abundance index (CPUE of the Japanese fleet) during this period as compared with the same period in 1976.

(4) We also question if the US proposal is really effective in increasing the abundance of the resource in coming years. Firstly, there is no observed relationships between the size of spawning stock and that of resultant offsprings, at least within the range of stock size we are dealing with. Secondly, 60 - 70% of the fishable stock is lost to predation and for other causes of death not attributable to fishing during the course of one year.

Thus the net effect of reduction in the TAC by 100,000 tons is no more than the addition of some 30,000 -

40,000 metric tons to the spawning stock in the following year, which is a mere fraction of the spawning stock to be easily masked by the annual variations in recruitment.

(5) Japanese pollock fishery has been hard-hit by successive reductions in the quotas in the past years. Yet, the reduction of the quota in 1977 was by far the severest blow to the industry, which forced 4 out of 17 Surimi-trawlers to retire permanently from the fishery. Industry is now in the state of unprecedented confusion and distress.

In contrasting the possible merits of the proposed reduction in the quota with the resultant damage on the industry, we are of the firm view that such a reduction is unreasonable and unacceptable. We wish to reiterate the view of our scientists that the resource can sustain the catch of well over 950,000 metric tons without adversely affecting the future of the resource.

2. Pollock in the Gulf of Alaska

The TAC should be set at 200,000 metric tons.

(1) Japanese and US scientists are not different in their views that the resource is in entirely healthy condition.

(2) We have the following reasons to propose the above TAC figure.

(a) The SY, as estimated by Japanese scientists, is 200,000 tons.

(b) US scientists estimated the MSY to be in the range of 169,000 - 338,000 tons and recommended the lower figure for the TAC in the coming year. On the other hand, we wish to point out that the recommended low figure is based on the unlikely assumption that not a single fish in the towing course escaped from the net. The high figure of 338,000 tons is computed on the assumption that half of the fish escaped from the net. The true figure is in between the two above, so that there is no substantial difference between the scientists of both countries in their view that this resource can sustain a catch of at least 200,000 tons.

4. Other Flounders in the Bering Sea and Aleutian Area

We propose that the TAC be set at 155,000 tons for the following reasons:

(1) Japanese and US scientists agreed at the meeting held in Seattle in early July this year that the condition of this resource is stable.

(2) The catch in 1974 was 155,000 tons. This, combined with the fact that catch per hour of trawling increased from 0.877 ton in 1974 to 1.062 tons in 1976, indicates that the SY

in recent years is in excess of 155,000 tons.

(3) For the reinforcement of our argument, we wish to refer to the following passage in the report of the said scientific meeting in Seattle;

"US scientists apparently did not include all past catch statistics for this species complex, leading to underestimate of ABC. The statistical base will be corrected and adjustment to ABC made in the fashion suggested by Japanese scientists."

5. Pacific ocean perch in the Gulf of Alaska

We propose that the TAC for 1978 be no less than that for the current year or 30,000 tons.

(1) In their analysis of the catch and effort data obtained from the Japanese fishing boats, Japanese scientists calculated the SY of this resource to be 61,000 tons, as compared with 50,000 tons estimated by US scientists.

(2) The direct comparison between the catches and CPUEs in recent years also confirms that the SY is greater than the recent levels of catch or about 50,000 tons.

Catch per hour of trawling

	Shumagin	Chiricof	Kodiak	Yakutat	Southeastern
1975	0.96	0.92	0.85	0.52	1.29
1976	1.61	2.01	1.20	0.77	1.16

(3) In view of the above as well as the inevitable, financial distress of the industry, we do not consider reasonable the proposed reduction of the TAC from 30,000 tons to 25,000 tons.

(4) We wish to stress the following points in this context.

(a) With the average of 50,000 tons of catch in recent years, signs of recovery are evident, as apparent in the trend of CPUE.

(b) Even if one accepts the US estimate of 50,000 tons as the SY, there will still be 20,000 tons left for rebuilding the stock.

6. Herring in the Bering Sea

We propose that (1) TAC be set at no less than 20,000 metric tons and that (2) an area bounded by 168°W, a straight line connecting 60°N-168°W with 58°N-163°W, and 58°N be excluded from the current closed area (east of 168°W and north of 58°N).

(1) The draft Management Plan recommends 18,000 tons as the TAC. It is explained that the balance between the TAC in 1977 (20,000 tons) and the proposed TAC for 1978 (18,000 tons) is for the catch landed by the US fishermen in excess of their quota during the 1977 season.

(2) In the light of the large annual fluctuations in the size of recruitment, we can not believe that the reduction of the quota in such magnitude be useful for the purpose of conservation.

(3) Many of our longliners have been habitually fishing for herring during spring months. However, their operation has been seriously hampered by the establishment of the closed area. In view of the increased dependance of our longliners on herring fishery, we propose a part of the closed area be open to them. We understand that there would be no competition with indigenous fisheries, should the southwestern corner of the current closed area be opened up as we propose. We are also quite prepared to take necessary steps to control the number of Japanese boats to go in that area at one time.

7. Shrimp in the Bering Sea

We propose that the suitable TAC for shrimp be established so as to enable Japan to be allocated 200 metric tons in the waters around the Pribiuf Islands and 400 metric tons in the waters north of 60 N and between 177°W and 178°E.

(1) Japanese shrimp boats caught 440 metric tons in 1976 and 613 metric tons from January through February

in 1977 in the Pribilof area. They also caught 3,500 metric tons in 1975 and 1,770 metric tons in 1976 in the northern area.

(2) Our fishery experience in the past two years indicates that these resources have now recovered to a very high productive level.

However, the present US regulations do not permit the harvest of this species, leaving the resources entirely unutilized. There is no US fishery in either of the two regions.

(3) The purpose of our proposal is to permit small scale operations for the collection of first-hand knowledge on the magnitude of this resource. It would also allow the retention of shrimp in small quantity caught incidentally in directed fisheries for other species.

The present regulations require that all incidental catch of shrimp be discarded.

8. Black cod in the Bering Sea, Aleutian area and the Gulf of Alaska

We propose (1) that the TAC for the Aleutian area be maintained at the current level of 2,400 metric tons, and (2) that the TAC for the Gulf of Alaska be increased by 1,100 tons up to 23,100 metric tons.

We also propose that the four closed areas is recommended in the draft not be established.

(1) Our scientists believe that the resource of black cod in the North Pacific constitutes one single stock, and that it should be treated as such in assessing the condition of the resource. (Tagging experiments clearly demonstrate the presence of inter-exchange of fish between the three regions. It is also known that there is neither spawning ground nor distribution of juvenile fish in the Bering Sea and Aleutian Islands.)

(2) Although the average CPUE of our longline boats declined in 1976 (0.104 ton per 10 "hachi" in 1975 to 0.095 ton in 1976) in the Aleutian region, the averages for the Bering Sea and the Gulf of Alaska went up in 1976 (the former from 0.030 ton in 1975 to 0.035 ton in 1976, and the latter from 0.163 ton in 1975 to 0.183 ton in 1976).

The overall average for the three regions combined in the 1976 was also about 10% better than in 1975 (0.143 ton in 1975 to 0.160 ton in 1976). This indicates that the SY for the whole region is perhaps in excess of 30,000 tons.

Aleutian Area (TAC)

(3) Draft Management Plan seeks the reduction in the TAC for the Aleutian region for the reason of decline

in the CPUE.

We do not subscribe to this argument, in view of the fact that the Aleutian region is on the margin of distribution of black cod.

As such, the abundance in the region is much more susceptible to the changing environment of the area and does not reflect the change in the abundance in the center of distribution.

Even for the purpose of monitoring the change in the abundance, it seems more logical to maintain the TAC at the present level for a certain number of years, rather than attempting to adjust the TAC closely with the change in the CPUE.

Gulf of Alaska (TAC)

(4) As we pointed out earlier, the CPUE in this area went up by 11% in 1976. It should pose no problem to increase the TAC by some 5% from 22,000 tons to 23,100 tons.

This will allow the US catch to grow as planned, without reducing the foreign allocations.

Gulf of Alaska (closed areas)

(5) Reasons for our objection are as described below:

(a) There is no biological reason to introduce the closed areas for this highly migratory species.

(b) There is no or little possibility of gear conflict between US black cod fishery and the Japanese trawl fishery in the areas in question, since the latter does not fish for black cod.

(c) The present US regulations do not permit longliners to operate for black cod shoreward of 500m depth contour. In other words, the Japanese fishing grounds for black cod do not overlap with the US fishing grounds.

(6) The establishment of the four closed areas creates the following difficulties with the Japanese operations:

(a) Yakutat and Southeastern Areas where the closed areas are proposed are the major fishing grounds for the Japanese fishery, producing 40 - 50% of the total catch of this species in the Gulf of Alaska.

(b) The establishment of the four closed areas will have far reaching effects on the longline fishery, since the longline operations are to be broken into fragments in between the neighbouring closed areas which are spaced at short intervals. The distance between the one off Cape Edgecumbe and the one in Salisbury Sound is no more than 6 miles, while that between the latter and

the one at Gross Sound Gully is mere 13.2 miles. Intervals are all too short for the affective operation of longline gear which is set over a long distance along isodepth lines (in the north-to-south direction in this region).

9. Other groundfishes in the Bering Sea, Aleutian area and the Gulf of Alaska

We propose that the TAC for this category of fish for 1978 be set at the levels of the current year, namely 93,600 tons for the Bering Sea and Aleutian area and 16,200 tons for the Gulf of Alaska as against the draft proposals of 84,200 tons and 14,500 tons respectively.

(1) The draft Management Plans call for the reduction of the TAC by 10%. This proposal, as we understand it, is intended to induce fishing nations to initiate stock assessment work on individual species within this complex so that separate quotas may be set for some of these species in the near future.

(2) Although the good intention of this policy is understandable, the approach as proposed goes too far to be realistic for the following reasons:

(a) The other groundfish category comprises a number of species of no or little commercial value, and none of them are caught in sufficient quantity to provide, at least in a few years' time, a basis for the stock assessment.

(b) Catch of certain amounts of "other groundfish" is unavoidable in directed fisheries for other categories of fish, so that the reduction in the quota for other groundfish could seriously hamper or even make impossible the attainment of the quotas for target species.

(c) Scientists of both countries agreed in Seattle that the condition of this species complex is in healthy state. This is underscored by the fact that the CPUEs of our fisheries in the two regions in 1976 made improvements over the previous year.

Catch per hour of trawling in metric tons

Bering-Aleutian	Pair Trawl	Danish Seine	Stern Trawl
1975	0.031	0.013	0.029
1976	0.036	0.046	0.019

Gulf of Alaska	Frozen Fish Factory Trawl
1975	0.142
1976	0.142

10. Pacific cod in the Gulf of Alaska

We propose that provisions be made to permit longliners to catch Pacific cod.

(1) The draft Management Plans propose a substantial increase in the TAC for this species, and yet there are no provisions in the regulations for the current year by which to permit foreign fishing vessels to catch Pacific cod by use of longline or trap gear.

(2) Japanese longline fishery suffered a great financial loss in 1977 due to the substantial reduction in the quota for black cod in the Gulf of Alaska.

It is, therefore, the intention of the Government of Japan to arrange for a substantial portion of Japanese quota for Pacific cod to be allocated to our longline fishery.

(3) Since Pacific cod are mostly found shoreward of the 500m depth contour, provisions need be established in the regulations to allow longliners to operate for this species shoreward of this depth contour, at least in the area west of 157°W, excluding the areas closed to longline, where there is little conflict with US fisheries.

11. Atka mackerel in the Gulf of Alaska

We request that the quota of 2,000 metric tons be allocated to Japanese fishery. We understand that the TAC for 1978 is proposed to increase by 2,800 metric tons.

12. Squid in the Gulf of Alaska

We request that the preemptive TAC of 2,000 metric tons be established.

Japanese trawl fishery annually caught around several hundred tons of this species in recent years. As fishery for this underutilized species is expected to expand, it would be appreciated if a separate preemptive TAC is set forth, as it has been done with respect to squid in the Bering Sea.

13. Proposed area-quota system in the Gulf of Alaska

We urge that the proposed area-quota system by INPFC statistical subareas be reconsidered and that its implementation be postponed until it proves to be practicable.

The draft Management Plan proposes the establishment of a number of subarea quotas in the Gulf of Alaska.

The merits of this proposal is highly questionable in terms of the conservation purposes. It is also certain that the proposed measure will bring a number of economically burdensome factors into the fishery, inter alia, increased days of travel between different subareas. It may very well hamper the fishery from attaining the quotas for major target species.

The reasons why we question the merits of the proposed measure are as follows:

(a) There are already a variety of other regulatory measures in force to ensure the conservation of the resources, such as catch limit, closed areas and seasons.

(b) Migration range of many species, if not all, in the Gulf is unlikely to be limited to within any statistical subarea. In fact, many species are known to migrate as much greater distance.

(c) Due to the lack of basic data, there is no good enough criteria to divide the overall quotas for the Gulf into small subareas in accordance with their productivity.

Any such division, therefore, runs the risk of allocating unproportional quotas to many subareas in comparison with their real productivity.

(d) The economy of the vessel operation is such that it is very unlikely that any particular area is overfished to a dangerous level. Without the area quota system, the boats will always shift to a better fishing ground after a certain amount of fishing.

14. Saury off Washington, Oregon and California

We propose that the quota of 40,000 tons be allocated to Japanese fishery.

(1) Although the reliable information on the magnitude of this resource is not available, Ahmstrom (1968) estimated the size of stock to be 225,000 tons, while the estimated TAC by Gulland(1972) stood at 100,000 metric tons.

(2) Since the resource is left entirely unutilized, some sectors of the Japanese fishing industry are now planning to initiate an exploratory fishing using stock-held dip nets. We appreciate therefore if the suitable provisions be made in the regulation to meet the wish of our industry concerned.

B. Atlantic Ocean

15. Loligo and Illex in the Atlantic

We propose the following amendments be made to the draft Management Plan:

- (1) The TAC for Illex be no less than 106,000 metric tons.
- (2) The US capacity for Loligo and Illex in 1978 be readjusted to a more reasonable level.
- (3) Provisions be made to establish the following open seasons for this fishery in the current US regulation (SEC. 611.51(c)).
 - (i) For Areas 1-5, January 1 through February 28.
 - (ii) For Area 3, June 15 through September 15 for Illex.
 - (iii) For Area 4, November 1 through December 31 for Loligo and butterfish, and
- (4) Closed area between 100-200 fathom lines be lifted, at least, for the period from June through September with respect to Area 2 and 3. (Sec. 611.51 (j) of the current US regulation).

TAC for Illex

The 1977 report of the ICNAF Assessment Sub-Committee estimates biomass of Illex in ICNAF Areas 5 and 6 for 1976

to be 353,000 metric tons, Georges Bank contributing 258,000 metric tons. On the basis of this report, the TAC for Areas 5 and 6 can be calculated as 130,610 metric tons. However, in establishing the TAC for Areas 5 and 6, it may be more prudent if allowance is made for the catch quota (25,000 tons) in ICNAF Areas 3 and 4, since the resource in the two regions is considered to constitute one and single stock.

We therefore propose 106,000 metric tons as the TAC for 1978.

US harvesting capacity

(1) The draft estimates the US harvesting capacity for *Loligo* and *Illex* to be 45,000 metric tons, an increase of about 10,000 metric tons over the previous year. We are skeptical about the validity of this estimate since it represents 14.6 times (for 1977) or 18.6 times (for 1978) the maximum US catch ever achieved in the past (2,422 metric tons).

(2) As a matter of fact, US fishermen gave this July portion of their allocations to foreign countries in recognition of their incapability of achieving their target.

We also understand similar readjustment may be forthcoming in September once again. In view of the above and the fact that squid fishery requires considerable practical experience, there seems to be little likelihood that the US capability for 1978 improves by 27% over and beyond the planned capability for 1977.

(3) An argument may be made that reallocation of the quota should always be possible during the course of the year. However, since fishing needs careful planning in advance, no one would disagree that such an argument does not alleviate the responsibility on the part of US fishermen to make more reasonable estimates of their capability.

Open seasons

(1) Loligo and Illex are noted for their extensive migration, and their migration routes are quite variable.

Restrictions on fishing grounds or seasons would never be feasible, should such restrictions be in contradiction with the behavior of this species.

(2) We noted that the regulations as described in the draft PMP published by US last September offered reasonable compromise between our squid fishery and US

lobster fishery.

However, we regret that the major modifications were introduced in the final version of the regulations in such a manner as to impose undue restrictions on foreign squid fishery.

(3) The proposals we listed in the foregoing are intended to eliminate only those undue and unbearable burdens on our squid fishery.

(a) Purpose of our proposal (3) (i) is self-explanatory, which reflects the change in the effective date of the regulations from March 1, 1977 to January 1, 1978.

(b) Summer *Illex* fishery is limited to Areas 2 and 5 only, which makes this fishery totally uneconomical. Since Area 3 is not only the most important area of distribution but an indispensable link between Area 2 and Area 5, opening of Area 3 during the summer months from June 15 to September 15 is essential for this fishery. We also understand there is no significant operation of US pot fishery during this period, and hence no risk or gear conflict between the two fisheries.

(c) As in *Illex* fishery, it is essential for winter operation for *Loligo* and butterfish to be able to continue all the way from Area 1 through Area 5. Areas 3 and 4 are

most important.

We therefore request that Area 3 be open from November 1 through December 31.

Closed areas

(1) We request the mitigation of the ban on trawling in the waters between 100 and 200 fathom line.

This depth layer covers almost all of the depths in which Illex are found in abundance.

We understand that only a few pots are set in the waters deeper than 100 fathoms. There should be no difficulty for the trawlers to avoid such pots, since the locations of the pots are communicated to them through the Coast Guard at all times.

(2) In view of the above, we propose the removal of prohibition of trawling in this depth layer in our most important fishing grounds during the most critical period of fishery, namely Areas 2 and 3 from June through September.

16. Butterfish in the Atlantic

We propose (1) that the TAC for 1978 be set at 41,000 metric tons and (2) that this species be treated as the target of directed fisheries.

TAC

(1) The average size of biomass during the period from 1968 to 1973 is estimated by G. Waring (ICNAF Res. Doc. 75/74) to be 61,400 metric tons.

(2) Using this estimate, the TAC is calculated to be 41,000 metric tons (Emax is computed as 0.67).

Incidental catch

(1) Under the present regulations (SEC 611.51(g)), catch of butterfish is limited to the catch incidental to fisheries for Loligo and Illex.

(2) Since butterfish share their habitat with Loligo in winter months and have good commercial value, they are sought by our fleet as a target species.

(3) It is therefore more reasonable to treat this species as a target species for the Japanese fleet.

17. Mesh-size regulations for squid and butterfish fisheries

We propose the squid and butterfish fisheries be exempted from the application of the mesh size regulation (SEC. 611.51(e)), which prohibits the use of net with mesh-size of 60mm and less.

Squid is a very pliable creature, easy to slip out from the net. Results of our comparative study on the catchability of different mesh sizes for Loligo indicate that the 60mm net is only 53-60% effective in catching squid as compared with the present gear (Double nets; one with 30mm in mesh size and the

other 60mm). Similar results are expected for Illex and butterfish.

Our fishery works on concentrated schools of squid and butterfish, incidental catch being no more than 6% of the total catch. It seems quite unreasonable to impose mesh restrictions for this fishery when the incidental catch of other species is of negligible magnitude.

A. North Pacific Ocean

I. Tanner Crab.

1. Tanner crab in the Bering Sea

We propose that the closed area for this fishery not be expanded beyond the present boundaries.

The draft Management Plan recommends the expansion of the closed area by 120 miles northwards to 58°N.

We wish to point out that this recommendation amounts in substance to the elimination of Japanese fishery almost entirely from the current fishing grounds. It also purports to deny the allocation of *C. bairdi* to the traditional Japanese fishery in spite of undisputable fact that the resource is capable of producing, on a sustained basis, 20,000-30,000 tons more than the U.S. fishermen can harvest.

(1) First, let us comment on the resource aspect of the proposed regulation.

(a) The fishable stock of large *C. bairdi* with carapace width of 129 mm and over is estimated by U.S. scientists to be 158-210 million crabs, large enough to allow the optimum catch at least 4 times the present catch in the current fishing grounds alone.

(b) The ABC of large males with carapace width of 140 mm and over is defined by the U.S. scientists to be 49,000

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Comments by the Japan Fisheries Association
on the Foreign Fishing Regulations of F C M A

September, 1977

Japan Fisheries Association

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Message from group leader, Mr. Tomoyoshi Kamenaga

Thank you very much for taking time from your busy schedule to meet with us today. All of us have been engaged in fishing or fishery-related businesses since we were young. Today we are still devoting all our energies to fishery activities.

Negotiations are now under way concerning fishing operations by Japanese fishing boats in your fishery conservation zone extended to 200 miles. Prior to the settlement of these negotiations, we, the top people responsible for Japanese fishing industry, are visiting your country to explain the actual situation of Japanese fishing industry so that you can understand our situation more deeply.

Japan is a country that greatly depends on fish for its existence. The diet of the Japanese people has been mainly dependent on fish since ancient times. Today, more than half of our animal protein comes from marine products. In order to meet Japan's ever-increasing demand for marine products, we, those engaged in the fishery business, have done everything possible to secure an adequate supply of marine products, as we have been doing since our ancestors first took to the open seas. In line with this, we have developed fishing grounds that other nations had paid no attention to and we have found out how to utilize fish as a food in a way that neither American nor European people paid any attention to. In developing the marine resources, we paid much attention to keeping these resources as plentiful as possible; we have practiced self-control so as to cope with fishing conservation measures enforced by other countries; and, further, we have been systematically promoting an increase in these resources.

The main reason why we are compelled to depend on fish for food is that our livestock industries find much difficulties due to Japan's geographical conditions and climate.

The fishing grounds that Japanese fishermen have mainly developed and depend on for good catches are located in the North Pacific Ocean. Our annual catch within the United States' 200-mile fishing zone in this area has been more than 1,400,000 tons. When the fishermen operate in this area, the processing industries and material suppliers also become involved, with the result that number of those concerned will become tremendous. Therefore, this area is very important toward maintaining the local economy in the north-eastern district of Japan where the people working in this area and their families are concentrated.

When our fishing industries operating in this area are affected by the establishment of the 200-mile fishing zone, we fear that the supply of marine products will become unstable and insufficient to feed the Japanese people, which will result in much confusion in the national economy. Therefore, we in the fishing business have submitted our opinions to your Government while the U.S. and Japan were negotiating on a tentative agreement on the operation of Japanese fishing boats in the U.S. 200-mile fishing zone. Now, while negotiations on operations in these waters during 1978 are in progress, we intend to give our opinions to the people concerned in your country so that they may have further insight into the problem. The points we intend to emphasize are as follows:

1. Fee Schedule

It is stipulated that foreign fishing boats operating within the U.S. 200-mile fishing zone pay Poundage Fee for 3.5 percent

of the ex-vessel price. Japanese fishing industry is on the point of recovering from the sluggish business caused by the oil crisis at the end of 1973, and only a part of the fishing sectors have been registering a profit. The catch quota is to be controlled by regulations. In spite of these unfavorable facts, we still have to pay the 3.5 percent fee, taking this fee from money we borrowed before leaving port in expectation of making a profit. Even if our fishing industry manage to cut down operating expenditures as is presently being tried, it still will be very difficult to make up the 3.5 percent that will be lost by paying the poundage fees. All in all, the industry's operations will deteriorate.

In addition to this problem we have to pay U.S.\$1.00 for each ton of a fishing boat as Permit Fee to enter fishing grounds within the fishing zone. This, in effect, is a double collection.

Taking into account the actual profit ratio that Japanese fishing boats operating in U.S. fishing zone can gain, we strongly request that the highest poundage fee should be 1.5 percent of the ex-vessel price; we also strongly wish that the permit fee be abolished, thus eliminating the double collection system.

2. Regulations and Catch Quotas

The proposal made by the United States concerning the regulations and fish catch quotas lowers the total allowable catches (from too much conservative and willful viewpoints) beyond the limit considered necessary to conserve the resources despite the fact that it was proved by analysis that there was no problem from the viewpoint of conservation of resources. Moreover, the proposal limits the fishing area in

such a way that foreign countries can only catch fish that have a low commercial value while domestic fishermen can catch the high commercial value fish and sell them for export at high prices. Furthermore, the proposal controls foreign fishing in complete negligence of the migration of fish and normal fishing methods. All in all, this proposal will lead to confusion in the management and operation of foreign fishing boats. We strongly request that you reconsider this proposal.

For example, the proposal aims at reducing the catch quota for Alaska pollack in the Bering Sea and the Aleutians without taking into account the result of an analysis based on actual catch records by the Japanese side. This will inevitably lead to a reduction in our fleet and its discontinuation. We believe that the quota for Alaska pollack should be set at 950,000 tons or more for 1978, which is the same quota as in 1977.

As for tanner crab in the Eastern Bering Sea, these are resources which Japanese fishing industries have invested long years and large sums of money to exploit. Yet in spite of the rationale that the results of these traditional performance must be fully respected, these excellent fishing grounds are being turned over to the U.S. Moreover, in respect to fishing grounds, there is a proposal to exclude Japanese boats from catching the commercially high-valued *C. bairdi* in the waters south of 58°N, where there are sufficient resources and no competition exists between U.S. and Japanese fishing vessels. To leave a large surplus of *C. bairdi* untapped and not to allow Japanese catch for this species goes against the democratic spirit of the Act, and it will have an extremely chaotic economic effect on Japanese fishing industries. We support the strong request made by the Japanese mission on

crabs, and along with this, strongly desire that you recognize our traditional operations south of 58°N.

Concerning sablefish in the Bering Sea, Aleutians and Gulf of Alaska, this is an intermingling single stock from the biological standpoint, and considering that there is a sign for this resource to recover as a whole, we feel that the same overall quota of 29,400 tons for last year be allowed again this year and that the proposal to establish the four closed fishing areas in the Gulf of Alaska should be withdrawn as it makes difficult to operate even in open areas.

Moreover, we strongly request that the allowable overall quota for the other bottom fish in the Bering Sea, Aleutians and Gulf of Alaska, be kept at the same level as the previous year. Also, consideration should be paid to increasing catch quotas for varieties of fish the stock of which has been replenishing, and to making efficient use of underdeveloped resources.

In light of the above, it is clearly evident that the United States is over-concerned about the maintenance of resources within the 200-mile fishing zone and has plans to excessively increase its domestic catch potential over this year. Moreover, the establishment of some close areas which disregards the operations of other nations and the migration of fish will deal a severe blow to operations of foreign fishing boats, and will produce uncertainty in their supply of marine products. We fear that it will throw the Japanese economy into chaos and, from the standpoint of the long history of friendly relations between our two countries, cast a dark shadow of anxiety over our relations.

On Tanner Crab in the Bering Sea

1. The crab fishery in the Bering Sea is a traditional fishery of Japan with its long history of endeavoring to develop the resources as well as the market for the catch and its processed products. If a decision is made which is likely to deal a fatal blow to this fishery, it will not only cause a great loss to the fishery people related, but also harm the fundamental spirit of friendship and understanding existing between the U.S. and Japan.
2. We understand that FMP of NPFMC aims at making no allocation of catch quota of *C. bairdi* to Japan, and also at limiting the fishing ground of the Japanese boats to the waters north of 58°N. where fishing for merely *C. opilio* is possible.

As the draft plan involves the following big problems, and should it be adopted and implemented as it is, management of the Japanese tanner crab fishery firms will be made impossible, we demand some modifications of the draft plan currently proposed.

- 1) According to the view of both Japanese and U.S. scientists on tanner crab resources, both *C. bairdi* and *C. opilio* resources are clearly in very good conditions, and it is regarded that allocating a considerable amount of surplus quota to Japan will cause no problem at all to the conservation of the tanner crab resources. We can't help saying, therefore, that the draft plan which gives a right to the U.S. that it harvests all *C. bairdi* of commercially higher value, but does not approve of any catch of *C. bairdi* by Japan, wholly lacks fairness and justice.

- 2) We regard that even the regulations currently imposed upon the Japanese fishing boats in the catch quota and fishing grounds, exceed the necessary extent for the conservation purpose. We are seriously concerned about the draft FMP plan for 1978 since, when adopted, it will drive all the Japanese fishing boats out of the existing fishing grounds and will make management of Japanese fishing firms impossible from the managerial viewpoint.
3. We sincerely request that the U.S. Government will make a fair decision for both domestic and foreign fisheries, and that, as a result of such measure by your Government, the appropriate and reasonable operations of the Japanese fishing industry, which has long performed a role of the pioneer in the development not only of the tanner crab resources but also of the market for their products, will be made possible.

Address by Hiroshi Tominaga, President, Japan
Deep-Sea Trawlers Association

I am Hiroshi Tominaga, president of the Japan Deep-Sea Trawlers Association. I have come here as representative of the Japanese fishery interests engaged in mother ship trawl and independent trawl fishing in the waters off the United States.

Affiliated with our association are six mother ships, and 92 their catcher boats with a total crew of about 4,100, which are engaged in mother ship-type trawling in the Northern Pacific, and 143 independent trawlers manned by about 5,700 persons, which are operating not only in the North Pacific, but also in other oceans, such as the Atlantic and Indian Oceans. The total catch of these affiliated fishing vessels stood at about 1,500,000 tons in 1976. Mr. Shioya, Mr. Atsumi and Mr. Takai, who are present here with me, serve as vice-presidents of our association. I should like to take this occasion to explain the actual state of our mother ship-type and independent trawl fishery so as to obtain your further understanding.

In line with the provisional fishery agreement between Japan and the United States, which came into force on March 4, we got down in real earnest to the task of adjusting ourselves to the arrival of a new era of 200-mile fishery zone by obtaining and studying various official notices of your country.

Nevertheless, I hope you will understand that for us who have long been accustomed to the old system, the new system which entirely differs in both basic thought and management system has turned out somewhat perplexing, although this might be partly due to the language barrier, and that, to

be frank, we have been rather at a loss what procedures and measures to take. As to what sort of confusion and change have occurred in our industry in the wake of the enforcement of the new system, I wish to cite here a few main examples for your information.

First, there has been a confusion regarding fish prices.

Mass media have given a big play to the arrival of the so-called "era of 200-nautical-mile fishing zones," reduction of catch quotas for Alaska pollack, P.O.P. and so forth, the subsequent scrapping of the number of fishing boats and a change of fishing grounds. Furthermore, a drastic cut in Japan's fishing quota under the provisional fishery agreement between Japan and the Soviet Union has been reported prominently in our country. As a result, the possibility of a shortage of materials for fishery products and an acute dearth of food has come to be loudly talked about among the consuming public, let alone in the fishery-related industries.

This, coupled with speculations by a sector of the marketing industry, sent fish prices, which began to go up from late March, skyrocketing and reaching a peak in May.

Nevertheless, a reactionary price slump set in from around July.

Meanwhile, consumers in general, still smarting from their bitter experiences in the wake of the oil crisis, have become very cautious in spending money, showing a strong tendency to seek inexpensive substitutes rather than by high-priced items. As a result, the so-called "sakana-banare" or a trend of breaking away from fish has become conspicuous, bringing about a steep fall in fish sales. For a time, it

even became impossible to quote fish prices, and producers, unable to sell at a loss, were forced to store fishes in refrigerators and to wait for a market improvement. The problem of 200-mile fishing zones has come as the biggest event in history for the fishery industry. We therefore had mentally prepared ourselves for its arrival, but it nevertheless has given a big shock to most of the Japanese people. Of course, we also think ourselves responsible for the matter, but the direct impetus which abruptly doubled fish prices was the Soviet Union's severe action in halving the catch quota for Japan. As a result, the Japanese consumers' reaction to the United States' fishing controls was promptly switched to the Soviet Union, and frankly, this gave us relief. We fishery interests, which are supplying 50 per cent of the Japanese nation's animal protein needs, consider it imperative to strive to minimize the shock to the nation and prevent their apprehension about a possible food shortage, and at the same time, to secure employment for those crew of fishing boats who have been excluded from the fishing industry as a result of the enforcement of 200-mile fishery zones.

We fully understand anxiety about a possible depletion of fish resources among the Americans. But we also should like to urge the Americans to pay heed to our position as well and exercise full care not to harm the friendly relationship between our two countries by forcing a drastic change on the food pattern of the Japanese people.

Secondly, this may be a digression from my main theme for today, but let me mention here a few examples of our failure due to fish affected by parasitic protozoans (Sporozoa), which we experienced in the process of developing new fishing grounds. We should be more than happy if these episodes

would serve to obtain your understanding as to how much strenuous effort the Japanese fishery interests have exerted to establish their main fishing grounds, which are now stable. One of the episodes concerns flatfish (yellowfin sole) in the Bering Sea. We have been catching flatfish in the Bering Sea and the Okhotsk Sea since before the war by means of the mothership-type operation. But because the principal objective was to produce fish meal, the problem of Sporozoa did not surface as a major issue. However, regarding part of the frozen flatfish for food, complaints came in frequently that fish meat dissolved in the process of secondary processing, making it impossible to continue processing, and that when the fish was broiled on gridiron by consumers, the meat came off and fell into the fire, leaving only the bone on the gridiron. Therefore, we producers did our best to clarify the cause, but in those days, we had no sufficient biological information as yet and therefore, could not pinpoint the exact cause. We simply presumed since the incidents mainly involved old fish that they occurred because the fish were so old they were about to die a natural death.

Let me cite another example we experienced when we conducted an experimental fishing operation in the waters from Vancouver Island to off the State of Oregon in order to develop hake fishing grounds. This mothership-type operation ended in a failure also because the fish were mostly infected with parasitic protozoans and therefore, could not be processed into mince or fillet.

Meanwhile, large-sized trawlers also went to the same waters, but all their fish products turned out unusable. Since they could not be thrown overboard, they were disposed of as meal material on land. An intensive investigation revealed that the spores of parasitic protozoans became active as soon as

the frozen fish were thawed and emitted proteolytic enzyme, which in turn dissolved the fish meat. But we could find no way of eliminating the parasites. The parasite-infected fish could not be processed into mince and were usable only for making fish meal.

Further investigations disclosed that old fish, which were mainly affected by the parasites, would diminish if fishing operations were stepped up to a considerable extent, and in that case, almost all parasite-infected fish would disappear in about 10 years' time. In recent times, demand for yellowfin sole caught in the Bering Sea has increased and their price has finally become stabilized on a paying basis. But this supply stability finally achieved through our laborious effort over the years has now proved short-lived with the emergence of the 200-mile zone issue. Therefore, we now find ourselves in a very embarrassing plight.

Lastly, let me say one more thing. That is, as regards Alaska pollack fishing, which forms a mainstay of the Japanese fishing industry, successive quota cuts compelled us to make a reduction of one mother ship fleet in 1975 and then to withdraw two of a total of 17 fish-meal trawlers and shift an additional two to the southern fishing grounds in 1977. The colossal expenses entailed by these measures have to be borne partly by those who continue to engage in Alaska pollack fishing. As a result, great sacrifices are being made even by those retained in this field of fishing, let alone by those who have had to go out of business or to change to other jobs. Moreover, unemployment caused by the reduction of fishing vessels is developing into a serious social problem. This is all the bigger headache for Japanese shipowners since there is a lifetime employment system for seamen in Japan.

Summary of a Speech Made by Mr. M. Shioya, Executive Vice-President, Taiyo Fishery Co., Ltd.

I am going to state about our demands on the Alaska Pollack in the North Pacific and also on the bottom fish in the Northwest Atlantic about which we are most seriously concerned. Before proceeding to make my speech, I should like to take this opportunity in expressing our deepest thanks for the very kind and friendly considerations and measures taken by the Coast Guard of your country and other various agencies concerned when some of our crew suffer from sickness or injury on the fishing boat at sea or an accident or a damage occurs to the boat.

I hereby wish to state about the following claims and demands in a concrete form, with a full appreciation of the fact that most of our major fishing grounds where our fishing boats had been operating for many years, are now included in 200-mile fishery zone of U.S.A., Canada or U.S.S.R. and have come under the strict jurisdiction of these countries, which is entirely different in its content and severity from jurisdiction previously exercised.

I. The demands on the Alaska pollack in the North Pacific

1. (Bering Sea)

We understand that the U.S. side is going to reduce hereafter TAC of the Alaska pollack in the Bering Sea and Aleutians by 100 thousand metric tons from 950 thousand metric tons of 1977. We strongly demand that the 1978 TAC be set on the level higher than 950 thousand metric tons, which was for 1977.

The reasons for our demand are;

- 1) Japanese scientists estimate the sustainable yield for these species to be more than 1,100 thousand

metric tons. As CPUE for 1975 and 1976 are approximately on the same level, the catch of 1,270 thousand metric tons in 1975 can be regarded as a sustainable yield for these years. The catch during 1976, however, was a great deal less than 1,270 thousand metric tons; therefore, we consider that TAC for 1978 is not necessary to be less than 1,100 thousand metric tons.

- 2) The U.S. scientists hold the view that the fish resources are diminishing, because no strong year class has occurred since 1972. But we consider that, as CPUE of 1977 improved from that of 1976, the catchable fish resources may considerable be increasing.
- 3) We can see no evidence for the year class of 1977 or later being weaker than 1972 year class, according to the size composition sampled up to July 1977.

From the above knowledge about the fishable resources of Alaska pollack, we believe that the view held by the U.S. side that the fish resources are diminishing, is not appropriate, and that there is no ground at all for further reducing TAC from the level of this year.

- 4) One fleet of mother-ship type dragnet fishery was reduced in 1975 as a result of continual reduction of the catch quota till then. Two independent trawlers were also reduced in 1977 from 17 surimi (minced fish meat) trawlers then operating in the area as a result of reduced quota, and also two additional independent trawlers

were converted for the use in the fishing grounds in the South Pacific.

The Japanese fishing industry has suffered from a great loss due to the above reduction in the number of boats. If the catch quota is further reduced in 1978 and the number of fishing boats has to be reduced as a result, consecutively for two years, great dislocations will entail in the Japanese fishing industry; many crew members of fishing boats will become unemployed, and some plants of the processors of fish meat will be closed down because of a short supply of raw materials.

Although we are seriously concerned about the conservation of Alaska pollack resources, and are determined not to spare our efforts whatsoever to protect them, including the self-control to maintain the number of fishing boats at the current level, we cannot agree, as previously mentioned, to TAC of 850 thousand metric tons as proposed by the U.S. side. This quantity is not only inappropriate to the Japanese fishery, but also will force it to pay extremely dearly. Therefore, we strongly repeat our demand that TAC be decided at a level higher than 950 thousand metric tons as proposed by the Japanese side.

2 (Gulf of Alaska)

We understand that you intend to propose increased TAC for 1978. Your proposed TAC will be 169 thousand metric tons, an increase from this year's 150 thousand tons. We also understand that this increase

is planned on the ground that the Alaska pollack resources in this area are in good conditions. However, we wish that TAC for 1978 be determined at a level of 200 thousand metric tons. This figure is announced by the Japanese scientists as an appropriated catch for the same year.

The reason why we propose the above figure is that both the U.S. and Japanese scientists have agreed that the Alaska pollack resources in this area are in good and stabilized conditions. The only difference in the opinion of the U.S. and Japanese scientists is that the Japanese scientists would wish to set TAC at 200 thousand metric tons, while the U.S. counterparts estimate it within a range of 169 to 338 thousand metric tons, and you have adopted the low end of this range — 169 thousand metric tons as TAC. Your ground for adopting 169 thousand metric tons is the calculation done on an assumption of q (catchability coefficient of survey net) = 1.0 and 0.5. You have adopted a calculation done with $q = 1$, meaning the smallest of ABC. In other words, the calculation is done on an assumption that no single fish escaped from the net. This will never happen. TAC of 169 thousand metric tons proposed by your side would become to mean an underestimate. Even if TAC is set at a level of 200 thousand metric tons as proposed by the Japanese side, it still is rather on the lower side of the range of your estimation and can be regarded to ensure sufficient safety.

II. Demands on the species of fish for trawling fishery in Northwest Atlantic

1. The species we fish directly for in this area are

almost limited to loligo, illex and butter fish. We appreciate the fact that you have an understanding of this, and that you are considering the catch allocation to Japan mainly of these species. Studies by many scientists have made it clear that the squids are an annual or biennial fish and that butter fish is an biennial or triennial fish. Different from other bottom fish, the fishable resources of these species are affected rather by changes in natural environment than by fishing activity, unless fishing occurs in their spawning grounds such as shallow waters (loligo and butter fish) and off-shore of the continental shelf (illex). As regards squids in the other sea areas as well, the catch of a certain year does not necessarily affect potential catch of the following year.

Moreover, the slope of the continental shelf where our fishing is carried out, does not fall upon the spawning ground.

We demand an increase of appropriate tonnage in the catch allocation of loligo, illex and butter fish, because the scientists of our country estimate TAC to be considerably larger than that by their U.S. counterparts which has been proposed as TAC for 1978. An undigested portion of 1977 quota of loligo and illex of your country was reallocated about the middle of last August. As you are very well aware, it is our country that makes the best use of these species for food protein, and attaches a great importance to them. Therefore, we should like to ask you to increase our quota by as large a margin as possible, while keeping your quota at a

level of actual catch capacity.

2. Now, to speak about the fishing ground for squids, the "window concept" is introduced there and also regulation by means of water depth is implemented. We are well aware of the aim of these regulations, that they aim at protecting the lobster pots and other major fish resources in this fishing ground. However, since we are able to be kept informed of the exact locations of these pots, we surely can avoid any gear conflicts. On the other hand, these regulations hamper our fishing operations very much. In view of this, we sincerely request that these regulations be relaxed.

As regards the regulation of mesh size, the incidental catch of species other than squids and butter fish is very small indeed, so small that it is almost negligible.

In case the incidental catch of considerable quantity occurs, we will take most efficient corrective measures immediately, including for instance, the removal of the boats to another fishing ground at once. If the mesh size is forced to be beyond 60 m/m, such larger meshes will seriously affect our squids and butter fish fishery in which there is very small — almost negligible — amount of incidental catch of species other than these fish. We therefore, ask you to consider the continued use of the mesh of the current size.

3. I have frankly stated our demands on the catch allocation of the Alaska pollack in the North Pacific and

the squids in the Northwest Atlantic for the next year. We believe that our demands would sufficiently be appreciated by you, in view of the stock condition of these species, and the fact that an increased quota for the Japanese fishery will never reduce the profit of the U.S. fishermen at all.

Finally, I would like to ask all of you to pay attention to the fact that the Japanese bottom fish trawl fishery is going to be put on the extremely difficult spot. To ease such difficult situation of the Japanese fishing industry, we sincerely wish that your special consideration be given to our demands on the quota of the Alaska pollack in the North Pacific and squids in the Northwest Atlantic for the next year.

Thank you very much for listening.

Request on Proposed 1978 Fishery Management Plans
and Foreign Fishery Regulations

Hiroshi Tominaga, President

(Japan Deep Sea Trawlers Association)

1. Alaska pollack in the Bering Sea and the Aleutians
TAC for 1978 should be set at more than 950,000 tons.

Reasons

- (1) Japanese scientists estimate the sustainable yield to be more than 1,100,000 tons. Since CPUE for 1975 and 1976 remained almost at the same level, the 1975 catch of 1,270,000 tons is believed to be the equilibrium yield in this period. However, the catch in 1976 dropped far below the 1,270,000 ton level due to quota restrictions. We therefore do not believe that the allowable catch for 1978 should be set below 1,100,000 tons.
- (2) U.S. scientists hold the view that resources will be reduced because no strong gear class has been produced since the strong 1972 class. However, since CPUE for 1977 up to July is higher than that in 1976 for the same period, we believe resources have been considerably increased.
- (3) From the size composition sampled up to July 1977, there is no sign that the number of fish generated has been on the decline since 1973.

2. Herring in the Bering Sea

The quota for Japan should be raised at least to the 1976 level of 18,000 tons.

Reasons

- (1) It is believed the resources have rapidly been recovering judging from the size of our catches and the increases in migration to the U.S. coasts and in catches of spawning fish by the U.S.

(2) Consequently, we believe TAC should be increased to the 1976 level.

3. Shrimp in the Bering Sea (deep-water shrimp)

No quota has been assigned to Japan. It is requested that a quota of at least 600 tons be allocated to Japan.

Reasons

- (1) It appears that resources have made substantial recovery in waters off the Pribiuf Island and the area north of 60°N.
- (2) No U.S. fishing vessel is operating in these areas.
- (3) Since shrimp is prohibited species under the current regulations, Japanese vessels must throw away all shrimp caught incidentally. This is causing great inconvenience to operations.

4. Black cod in the Bering Sea, Aleutian and Gulf of Alaska

- (1) TAC for the Bering Sea, Aleutian and Gulf of Alaska combined should be set at least at the same level as in 1977 (29,400 tons).
- (2) The four proposed closed areas in the Gulf of Alaska should not be established.

Reasons

- (1) From results of study on migration of fish with marking, Japanese scientists have concluded that black cod in these waters constitutes a single stock.
- (2) Comparison of CPUE between 1975 and 1976 shows an upward trend as a whole.
- (3) Consequently, there is no scientific basis at all to support the U.S. proposal to reduce OY in Aleutian area by 900 tons and reduce the foreign catch in the Gulf of Alaska by 1,100 tons in order to increase U.S. harvest. OY in the Gulf of Alaska should be increased rather than reduction in FAC.

(4) We believe the four proposed closed areas in the Gulf of Alaska should not be established for the following reasons:

(a) Biologically, it makes no sense at all to establish such closed areas for migratory species like black cod.

(b) Our trawl fishery will not compete with U.S. black cod fishery because Japanese trawlers do not pursue this fish as the principal species in their operations.

5. Yellowfin sole and other flounders in the Bering Sea and Aleutian

(1) TAC of yellowfin sole should be set at 120,000 tons.

(2) TAC of other flounders should be set at 155,000 tons.

Reasons

(1) Japanese and U.S. scientists agree that resources remain stable.

(2) Comparison of CPUE between 1974 and 1976 indicates an increase in stock.

6. Other groundfishes in the Bering Sea, Aleutian and Gulf of Alaska

We find the U.S. proposal calling for annual 10% reduction in TAC to be extremely unreasonable.

Reasons

(1) These species are unavoidably caught during operations for principal fish. If TAC is reduced as proposed, this will seriously hamper operations for principal fish.

(2) Since these species are taken in small quantities, no sufficient data are available to assess their resources. Thus scientists find it impossible to estimate their stocks. Furthermore, scientists of both countries

estimate that CPUE for these groundfish complex as a whole has been increased with no deterioration in resources.

- (3) In view of these facts, TAC should be set at the same level as in 1977 (93,600 tons for the Bering Sea and Aleutian, and 16,200 tons for the Gulf of Alaska).

7. Alaska pollack in the Gulf of Alaska

TAC should be set at 200,000 tons.

Reasons

- (1) Japanese and U.S. scientists agree that Alaska pollack resource in this area is rich and stable.
- (2) However, as regards the problem of setting TAC, Japanese scientists estimate SY at 200,000 tons while U.S. counterparts give an estimate of 169,000 to 338,000 tons. The figure of 169,000 tons is not realistic because it is an ABC estimate obtained on the assumption that all the fishes in the trawling area will be caught. If the Japanese estimate of 200,000 tons is taken as ABC, this will correspond to the lower side of the U.S. estimate range.

8. Pacific Ocean perch in the Gulf of Alaska

TAC should be set at more than 30,000 tons.

Reasons

- (1) According to Japanese data, although about 50,000 tons of Pacific Ocean perch have been caught in the Gulf of Alaska and eastern Pacific in recent years, CPUE for 1976 increased in all the grounds as compared with the previous year. Japanese scientists estimated in 1976 SY to be 61,000 tons. From their experience, U.S. scientists also give 50,000 tons as ABC. In view of these facts, it is difficult to understand why a measure

must be taken to reduce catches of an important fish for Japan, thereby making the fishing operation economically unstable.

9. Atka mackerel in the Gulf of Alaska

It is requested that a quota of about 2,000 tons be allocated to Japan.

10. Squids in the Gulf of Alaska

Since future development of this fish is well expected, it is requested that the U.S. allocate a separate quota of 2,000 tons to Japan as was the case with squid fishing in the Bering Sea.

11. Quotas by sub-area in the Gulf of Alaska

We strongly request that the U.S. side withdraw its proposal to impose quotas in the Gulf of Alaska by INPFC's sub-areas.

Reasons

- (1) It is believed many species migrate and are distributed over an extensive area far beyond the limits of INPFC statistic areas. It is biologically nonsense to assign quotas by sub-area for such migratory fish.
- (2) If quotas are mechanically allocated, the distribution of schools of fish may not balance with assigned quotas. This unbalance will not only prevent effective use of resources but can cause harmful effect on resources as well.
- (3) Segmented quotas by ground will also seriously hamper efficient operations.
- (4) Many restrictions on fishing operations such as closed areas and closed fishing seasons as well as quota control have already been in force for foreign fisheries to conserve resources or avert conflicts of fishing gear.

The enforcement of additional restriction in the form of quotas by sub-area will unduly oppress foreign fisheries.

12. Squids in Atlantic

- (1) TAC of loligo should be set at 71,000 tons.
- (2) TAC of illex should be set at 106,000 tons.
- (3) As the quota for U.S. fishing vessels, a reasonable and attainable amount should be assigned based on catches in the past.

Reasons

- (1) Loligo and illex have a life span of one to two years and are abundant in resources. It is believed their spawning grounds are located in shallow waters near the coast, or away from the slope of the continental shelf where our vessels operate. Thus operations will cause no substantial effect on resources. Rather, the effect of marine environment in each year is considered to be much greater.
- (2) Incidental catch of lobster, crabs and bottom fishes is very small during squid and butterfish operations and their resources are not affected by these operations. This fact is also clear from the data of a Japan-U.S. joint survey conducted from July 19 through August 8, 1977 aboard the "Suzuka Maru".
- (3) It is therefore unlikely that the level of loligo resources has dropped since 1974 when TAC was 71,000 tons. Japanese scientists estimate that TAC of 106,000 tons will be reasonable for illex.
- (4) The U.S. squid quotas for 1977 were initially set at 11,500 tons for illex and 25,000 tons for loligo. However, part of these quotas was reallocated to foreign countries in July and August this year when it was found

unlikely for U.S. fishing fleets to meet these quotas. Despite this fact, the proposed U.S. quotas for 1978 exceed the figures for 1977 by 27%. Even if an unfulfilled portion of the quotas is reallocated as required to the relevant countries as was the case with 1977, there is the possibility that such reallocation of quotas cannot be fully utilized if they are allocated in the latter half of the year or after the fishing season is over. It is requested that the U.S. fishing capacity for 1978 be set at a reasonable amount at the beginning of the year or season based on the actual hauls in the past.

13. Butterfish in the Atlantic

- (1) TAC of butterfish should be set at 41,000 tons.
- (2) Butterfish should be treated as a target species rather than as bycatch species.

Reasons

- (1) The biomass of this resource was estimated at 60,000 to 90,000 tons at an ICNAF scientists meeting (ICNAF, Res. Doc. 75/74). The fish has a short life span of 2 to 3 years. For these reasons, we believe reasonable TAC will be 41,000 tons.
- (2) Under the regulations on foreign fisheries, butterfish can be taken only as bycatch in squid operations. This species occur with loligo in the same season and grounds, and has a high commercial value for us. Therefore, Japanese fleets are engaging in mixed fishery for both loligo and butterfish as target species. ICNAF Working Paper, 76/X11/58, fully explains this situation, describing the operation with the term "switch fishery".

14. Fishing grounds and season for squid operations in the Atlantic
 - (1) We request that a minimum of the following period be added as the season for each area provided under Sec. 611.51(C) of the Foreign Fishery Regulations:
 - a. A period from January 1 through February 28 for all areas
 - b. A period of June 15 through September 15 for illex operations in Area 3
 - c. A period of November 1 through December 31 for loligo and butterfish operations in Area 4
 - (2) We request that the ban on fishing in the waters of 100 to 200 fathoms in depth as provided under Sec. 611.51(d) of the Foreign Fishery Regulations be lifted. If this is impossible, it is requested that at least Areas 2 and 3 be opened to fishing in this depth for a period from June through September.
 - (3) As far as squid and butterfish fisheries are concerned, we request that the obligation to use nets of more than 60mm meshes as provided under Sec. 611.51 (e) of the Foreign Fishery Regulations be lifted.

Reasons

- (1) We are greatly dissatisfied with the 1977 restrictions on squid fishery because these restrictions have been enforced in utter disregard of the realities of the Japanese fishing operations. As you know, we organized the Japan-U.S. joint survey aboard the "Suzuka Maru" from July 19 through August 8, 1977 in an effort to acquaint the U.S. side with our fishing operations.
- (2) Your 1978 Foreign Fishery Regulations will come into force on January 1, 1978 and will apply to the whole year. Under Item 14 (1) (a) above, we requested that operations be allowed in all the areas from January 1

through February 28. We trust that this reasonable request will be granted.

- (2) Referring to Item 14 (1) (b) above, illex operations in summer cannot commercially be practicable if they are confined to Areas 2 and 5. Area 3 is an important ground, being located adjacent to Area 2. Since only a few lobster pots are installed by U.S. fishermen, there is no danger of gear conflicts. Also, for "loligo" and "butterfish" fisheries in winter season, continuous operations in Areas 1 through 4 are indispensable to commercially practicable operations. Areas 3 and 4 are particularly important as fishing grounds. It is therefore requested that operations in Area 4 from November 1 through December 31 be allowed.
- (3) Restrictions by depth of water as mentioned under Item 14 (2) pay no attention at all to the distribution of illex. The fishing ban will seriously affect operations because this species mostly occur in water at this depth range. We request that this ban be lifted during its season (June to September). It is our understanding that the restrictions by the depth of water have been introduced with the primary objective to prevent fishing gear from interfering with U.S. lobster pots. However, it is rare that lobster pots are installed at a depth of more than 100 fathoms in summer. Even if some pots should be installed, trawlers can learn their exact position from Coast Guards and completely prevent their fishing gear from interfering with the lobster pots.
- (4) Regarding the restriction on meshes of nets under Item 14 (3), as compared with bottom fishes and crustaceans, squids will readily pass through a net. According to results of a netting test on loligo conducted by Japanese scientists, a net of 60mm meshes can catch only 53 to 77% of the catch which the present net could

catch. Although the situation with illex and butterfish is less serious than "loligo", we fear that a substantial drop in catches will be inevitable. Bycatch of other species in the squid fishery is extremely small and it is irrational that the conservation of such a small quantity of fish will result in substantial reduction in catches of the principal species of squids and butterfish.

15. New U.S. proposals aimed at conserving halibut resources in the Gulf of Alaska

- (1) Restriction on use of fishing gear under which trawling will be allowed for pelagic only during six months (December 1 through May 31)
- (2) Allocation of quota by period in which catches will be limited to less than 25% of the total quota of FAC during six months (December 1 through May 31)

Since these new proposals will result in a fatal blow to Japanese fishing fleets, their withdrawal are strongly requested.

Reasons

- (1) With respect to the conservation of halibut resources in the Gulf of Alaska, Japan has abstained from catching halibut under INPFC and cannot catch this fish. Moreover, with the establishment of closed areas, closed seasons and restriction by depth of water, we believe the object of conserving the halibut resources can be fully accomplished. The new proposals, a matter of life and death to the already hard-hit foreign fleets, will upset the effective use of various species of fish by foreign fleets in order to conserve only part of the resources of one particular species.

- (2) According to INPFC DOC. 1701, Japanese scientists estimate the annual incidental catch of halibut from 1966 through 1967 (abandoned) by Japanese fleets at 400 to 500 tons. It is said that about 60% of these abandoned fish will die. In other words, 240 to 300 tons of fish are wasted. When this fact is taken into account, along with the additional restrictions such as closed season in winter and areas closed for fishing throughout the year to conserve the halibut resources, the effect of the new proposals for the same purpose is open to question.
- (3) According to the results in 1974 and 1975, Japanese trawl catches in these 6 months account for about 50% of the annual hauls. The proposal for reduction in winter-spring catches to less than 25% completely ignores such realities of operations. The fishing season is not fixed at a particular time of the year, and if a rich fishing ground is formed in winter, catches will fall short of FAC due to the arbitrary quota imposed on this season.
- (4) Japanese fishing vessels have developed their present trawl nets for demersal fishery through a series of improvements over the years and their trawling gear and method have a long tradition. If Japanese fleets are required to abandon these traditional equipment and method and to fish demersal fish with mid-stream trawl nets only, this will seriously affect their operations and deal a fatal blow to the Japanese trawling industry.
- (5) If data are statistically processed, it is only natural that the ratio of incidental catch of halibut in winter is higher than that in summer. However, in realities, this is not as simple as that, and principal species to be caught and fishing grounds to be formed must be taken into consideration. It is requested that a care-

fully thought-out application of these control measures be studied upon further investigation so that foreign fishing fleets can coexist with U.S. vessels in the waters under review.

Requests to the United States
on Japanese Fishing Operations

National Federation of Medium
Trawlers Association
(Landbased dragnet fisheries)

1. Increase in catch quota
 - (1) Regarding "flounders", it is desired that the catch quota be increased by more than 50 percent since future prospects of their resources are not gloomy under the present fish catching conditions.
 - (2) Regarding other ground fishes, it is desired that the catch quota be increased at least by 30 percent in view of the present conditions of their resources.

2. Decrease in no-fishing zone

Catch of halibut and shrimp is banned yearly during the entire fishing period and in the entire fishing zone. But it is desired that no-fishing zone for shrimp, in particular, be lifted.

3. Shortening of the period of fishing permit application
 - (1) To simplify the administrative work on both sides regarding alteration of the contents of permit applications, it is desired that the period for such applications be shortened to less than the present designated period - 120 days before fishing operation is started.
 - (2) It is desired that the procedures for permit application be simplified, that is, alterations of ships, etc. be approved by the U.S. side only through our information or notice.

4. Prior notice on observers' getting on board

It is desired that any plan for having observers onboard be informed beforehand through the Fisheries Agency at least one month before.

5. Understanding of inevitable incidental catch of continental shelf resources

Since continental shelf resources are inevitably caught incidentally in the nets when dragnet fishing is conducted, flexible measures and considerations on the U.S. side are highly desirable.

6. Measures taken to supplement Japanese fishing crew's English-speaking ability

It is extremely difficult to assign English-speaking crew members to all fishing boats, however hard we may try to foster such persons in a short time. As a remedial measure, therefore, basic spoken-English handbooks have been distributed to all fishing boats so that trouble is seldom caused in mutual communication, etc. with the observers and inspection officers.

7. Presentation of U.S. 3-mile and 12-mile charts

To avoid trouble, it is desired that the U.S. side present such charts to the Japanese side.

Demands on Draft Fishery Management Plan and
Draft Foreign Fishery Regulations for 1978

Yoshiro Okazaki

President

North Pacific Longline-Gillnet
Association

The North Pacific Longline-Gillnet Association was organized in 1968 by smaller fishing industries in Japan, and has since been engaged in fishing operations, under the guidance of the Japanese Government, with its 22 fishing vessels whose tonnage is less than 500 gross tons.

These fishing vessels have conducted orderly longline fishing for sablefish and Pacific cod in the Bering Sea, the Aleutians and the Gulf of Alaska, and gillnet fishing for herring during the May-June period in accordance with the U.S.-Japan Fishery Agreement and under the control of the U.S. and Japanese Governments.

With regard to the development of deep-sea sablefish resources, we have made considerable financial and technical investments in the long-term survey of the fishing grounds, improvement of fishing methods, maintenance of fishing vessels and expansion of production facilities to pave the way for the establishment of our enterprise what it is today.

At the outset, sablefish was not familiar to the Japanese market and the catch of this fish did not pay. As a result of the publicity of its cooking methods and various features through mass communication media, however, this species has come to be valued as food material fish and has become one of those North-Pacific fishes which deserve special attention.

In our longline fishing for sablefish, we have been catching the large-sized fish living near the steep slopes along the outer edge of the continental shelf. Most of the

fish thus caught by our vessels are grown-up ones.

Our fishing method using longlines is a passive one in nature, and is considered to be a highly ideal method from the standpoint of preserving marine resources since this method does not hurt the deep-sea environment in any way.

Thus, we believe that our longline fishing has a historical performance along the lines of the U.S. Fisheries Conservation and Management Act established in 1976.

The sablefish catch quota for our vessels for 1977 has been decreased by about 30 percent below the previous year's level, and it is considered that the U.S. fishing for this species will take such a big step forward now that the sablefish resources in the Gulf of Alaska have attracted your special attention.

Under such circumstances, we earnestly desire that the following items be taken into your full consideration in establishing the Foreign Fishery Regulations for 1978, so that our longline fishing, which is ideal for the conservation and effective use of sablefish resources, may not be strongly influenced economically:

1. It is earnestly desired that the plan for establishing four no-fishing zones in the Southeastern and Yakutat waters in the Gulf of Alaska in and after 1978 be cancelled. (F.M.P.8.3.2.1. G-(1)b)

Reasons:

- (1) It is meaningless, from the biological standpoint, to establish specific no-fishing zones for sablefish which are migratory in nature;
- (2) Japanese longline fishing for sablefish is conducted in deep waters (500 meters or deeper) than U.S. fishing. Therefore, no competition will take place between both

sides in regard to the fishing grounds.

- (3) In longline fishing, fishing lines are laid out at equal depth over a long distance. In case the four no-fishing zones are established, longline fishing even between these zones will become extremely difficult.
 - (4) The Southeastern and Yakutat waters in which the non-fishing zones are to be established are very important areas where 40 to 50 percent of our sablefish catch has been hauled. Therefore, management of our longline fishing industries will be hit severely by the establishment of such zones.
2. It is desired that part of the no longline fishing zones in waters less than 500 meters deep be lifted, so that our longline fishing for Pacific cod in the Gulf of Alaska may become possible. (F.M.P.8.3.2.1.G(3))

Reasons:

- (1) The drastic decrease in our catch quota of sablefish in the Gulf of Alaska this year has made the management of our longline fishing very difficult. To remedy this situation, your favorable consideration is highly desired so that we may catch Pacific cod in the Gulf of Alaska now that foreign catch quota of Pacific cod for 1978 in the same waters is expected to increase considerably next year.
- (2) It is our understanding that the U.S. is worrying about the influence of Pacific cod fishing in waters shallower than 500 meters depth on the halibut resources. But the reality is that, in some fishing grounds west of 157°W, the amount of halibut fishing is small and longline fishing boats of the U.S. do not operate so actively. Therefore it is strongly desired that, in waters west of 157°W (excluding waters where longline fishing is banned), the 500-meter depth

restrictions be lifted so that Pacific cod fishing is possible. When three U.S. observers are on board our Association's vessels on and after September 1 this year, we wish to conduct experimental operation for Pacific cod in the Gulf of Alaska in waters shallower than 500 meters depth and to make a survey of halibut incidences.

3. The U.S. is proposing to establish a no-fishing period for all foreign vessels in waters 140°W-147°W and 147°W-157°W in the Gulf of Alaska. But it is desired that this proposal be withdrawn so far as longline fishing is concerned. (F.M.P.8.3.2.1.G(1)(d)(e))

Reasons:

- (1) Japanese longline fishing vessels usually operate at the depth of more than 500 meters, and therefore they catch very few halibut and do not destroy their spawning grounds.
 - (2) U.S. fishing for halibut is conducted in waters less than 500 meters deep and there is no competition with Japanese longline fishing.
 - (3) Sablefish longline fishing vessels are required to operate in waters more than 500 meters deep, and therefore it is meaningless to establish closed seasons.
4. With regard to the non-fishing zone for herring in the Bering Sea, it is desired that the present zone (north of 58°N, east of 168°W) be altered to the zone encircled by the 168°W longitude, the line connecting the points 60°N-168°W and 58°N-163°W, the 58°N latitude and the coastal line.

Reason:

As a rule, the amount of herring catch depends largely on the condition of sea ice. It is therefore feared

that the present no-fishing zone may severely influence our fishing operations in some years. As a matter of fact, we have managed this year to catch half the 1000 ton quota for our gillnet fishing vessels. It is strongly desired therefore in regard to the fishing from next year on that the southwestern corner of the present no-fishing zone, which has no conflicts with the coastal indigenous fishing, be opened for us. As the herring resources are abundant, we believe that such partial liberation of the no-fishing zone will not affect the amount of catch by the coastal inhabitants.

Summary of a Speech by Mr. K. Tsuda, Fishing Industry Mission
President,
Federation of Japan Salmon
Fisheries Cooperatives

1. We understand that, following the preliminary meeting held in Seattle in August, the plenary meeting for the new treaty on the management of salmon resources in the North Pacific will be held between the U.S.A., Canada and Japan in Anchorage in October.
2. We have come over here to meet with you, who are in key positions of the U.S. fishery authorities, and to tell you about the true picture of the salmon fishery of our country for the purpose of promoting your understanding about the matter and securing your cooperation.

I, President of Association of the Shipowners of Mother Ships and Independent Ships, speak today on behalf of Japanese salmon fishing industry.

Mr. Motoji Kawabata represents the owners of medium-sized salmon fishing boats whose bases are in Hokkaido. Mr. Kawabata is President of Association of Shipowners of Medium-Sized Salmon Fishing Boats.

We should like to ask you sincerely to give special consideration, in the coming plenary session for a new treaty, to our position so that salmon fishing in the high seas — our traditional fishery — would be able to be continued.

3. We understand that the U.S. took a firm attitude in the

last preliminary meeting in Seattle, making a very drastic proposal that, in addition to keeping of the existing abstention line of 175°W.— a line with which we had been quite dissatisfied and which we regarded as illogical in view of its scientific ground — a regulated area be set up over a vast spread of the sea covering well more than a half of the Northwest Pacific.

Frankly speaking, we have some fundamental doubt about the provision on anadromous species in so-called 200 Mile Zone Act. However, we kept believing that we would be able to continue our fishing for this species without difficulties in the future, should appropriate measures be taken in a friendly and understanding atmosphere existing between our two countries. We wish that your consideration would be given, in the same way as done with respect to other species, to our traditional salmon fishery, based on the long-term agreement (articles 5 and 6) that was concluded between the U.S. and Japan in conjunction with the implementation of the said Act. We also wish that negotiations would be held between the two countries with respect to the management of the intermingling area for Asian and American origin salmons.

The current proposal made by the U.S. side, however, run counter to our expectations. If this proposal is adopted, even the entire fishing of Asian origin salmon will virtually become impossible. Our fishing industry will be unable to operate as a business enterprise in this narrow, limited fishing ground which is left over to us. Not only many fishery firms and related enterprises will have to close down, and a large number of crew and workers will be thrown out of the boats and plants, but also the supply of traditional food which

is indispensable to the Japanese diet will run short. This necessarily will lead to social dislocations and economic confusion of our country.

4. We have been abiding by the treaty of 1952 for twenty odd years since its conclusion, though having been entirely dissatisfied with its irrational provision by which the U.S. can unilaterally prohibit, in accordance with the theory of abstention principle, the catch of high-seas resources of salmon over a vast region of the North Pacific. We have faithfully observed the treaty for more than twenty years, as we believe that the treaty concluded between the Governments must be honored from the viewpoint of international faith. Frankly speaking, however, we regard that continuation of the Long. 175°W. abstention line in the new agreement to be reached after the enforcement of 200 Mile Zone Act is theoretically irreconcilable, and accordingly, we cannot express our full approval of the new treaty which basically consists of such contents.

We don't, however, assume a firm attitude, in considerations of the friendly U.S. — Japan relationship, persisting in our view, not giving over at all. We believe that the new treaty, if needed at all, should be drafted after a long period of deliberations to which the countries that are the parties thereto render their best wisdom, and the intent of Article 55 of the unified draft of the Law of the Sea should be incorporated into the new treaty.

5. We will not, as a matter of course, spare our effort for the conservation and increase of the American origin salmon resources. Both the U.S. and Japan should make