


BERING SEA/ALEUTIAN ISLANDS GROUND FISH CHECKLIST

The Council needs to review and take action on the following items at this meeting.

<u>Item</u>	<u>Tab</u>
1. Review PT and SSC ABC recommendations. Set 1989 ABCs.	D-2(a) D-2(a)
2. Review DAP and JVP survey results.	C-5, C-6
3. Set initial TACs.	D-2(b)
4. Set initial DAPs, JVPs, and TALFFs.	D-2(b)
5. Set initial PSCs for fully-utilized species.	D-2(b)
6. Review crab and halibut PSCs.	D-2(c)
7. Review definition of sablefish directed fishing.	D-2(d)
8. Review TACs and apportionments, and adjust.	D-2(b)
9. Approve final TACs, apportionments, and PSCs.	D-2(b)
10. Approve final PSCs for crab and halibut.	D-2(c)
11. Approve final definition of sablefish directed fishing.	D-2(d)

M E M O R A N D U M

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke  
Executive Director 

DATE: November 30, 1988

SUBJECT: Bering Sea/Aleutian Islands Groundfish Fishery Management Plan

ACTION REQUIRED

Review status of stocks and set ABCs.

BACKGROUND

The plan team has completed the final Resource Assessment Document (RAD) for BS/AI groundfish which was sent to you November 18. Recommendations for acceptable biological catch (ABC) for each species group have not changed substantially from those presented earlier, except for Greenland turbot and sablefish.

For Greenland turbot, the SSC recommends a different recruitment coefficient in the stock reduction analysis. Consequently, the estimate of exploitable biomass increased slightly, and the ABC increased from 12,600 mt to 20,300 mt.

For sablefish, results from the 1988 longline survey indicate that biomass in the eastern Bering Sea is higher than estimated earlier, but that biomass in the Aleutian Islands is lower. Consequently, the recommended ABC in the eastern Bering Sea has been increased to 2,800 mt, and for the Aleutians it has decreased to 3,400 mt from 5,800 mt.

Item D-2(a)(1) summarizes information presented in the final RAD on biomass, MSY, and recommended ABCs for 1989.

SUMMARY OF STATUS OF STOCKS AND ESTIMATION OF ABC

Walleye Pollock:

EBS	1988 ABC = 1,500,000 t	1989 ABC = 1,340,000 t
Aleutians	1988 ABC = 160,000 t	1989 ABC = 117,900 t
Area 515	1988 ABC = N/A	1989 ABC = 250,000 t

EBS            Projected 1989 exploitable biomass = 5.3 million t  
Exploitation = 25.3 percent; F0.1 rate

Aleutians      Projected 1989 exploitable biomass = 471,700 t  
Exploitation = 25 percent; F0.1 rate

Area 515       Projected 1989 exploitable biomass = 1,000,000 t  
Exploitation = 25 percent; F0.1 rate

Although abundance has declined slightly, this stock has been exploited lightly in the past (10% to 18%). Based on current catch rates for Asiatic stocks and model projections, it appears the pollock resource can be exploited at higher rates without loss in productivity.

Although there is limited information on the distinction of Aleutian Basin (possibly including Bogoslof area) pollock and those of the eastern Bering Sea, catches in the Bogoslof fishery are currently counted against the TAC for the EBS which may result in underutilization of EBS pollock. Based upon an initial estimate of exploitable biomass of 1 million t near Bogoslof and a 25% exploitation rate, a separate 1989 ABC of 250,000 t is recommended for this fishery.

The "donut hole" area of the Bering sea has become an important fishing ground for foreign pollock fisheries since the early 1980s. The estimated 1987 annual catch has reached 1.25 million t, almost as high as taken in the U.S. Bering Sea management area. It is not known if this level of catch would have an appreciable impact on the stock harvested within the U.S. EEZ. Any impact through contributions in recruitment, however, are not expected to be detected on the EBS shelf/slope region for 4-6 years after the fishery in the donut area. If this lag time is correct, it may be deduced that the donut hole catches of 200,000 t in 1984 and 340,000 t in 1985 did not appear to have had impacted the biomass in the EBS shelf/slope region. It is not known if the higher catches in excess of 1 million t in 1986 and 1987 would affect the EBS resource.

Pacific Cod:

1988 ABC = 385,300 t

1989 ABC = 370,600 t

Projected 1988 exploitable biomass = 1.19 million t  
Exploitation = 31.1 percent; Fmsy rate

An age-structured model was used to simulate the structure and dynamics of the EBS cod population. The 1989 biomass was projected and ABC was calculated based on the MSY exploitation rate. In the past 7 years, exploitation has only been 5-18 percent, with actual catch substantially less than ABC. The current biomass has remained very high and is projected to be so in 1989 and later.

Yellowfin Sole:

1988 ABC = 254,000 t

1989 ABC = 241,000 t

Current exploitable biomass = 1.53 million t  
Exploitation = 15.8 percent; F0.1 strategy

The slight decrease in ABC reflects the results of an age-structured model that estimates population levels and exploitation with the F0.1 fishing strategy. Exploitable biomass has been projected to increase from 1.4 million t in 1988 to 1.53 million t in 1989. Exploitation this year is approximately 16 percent as applied to current exploitable biomass. The rate used last year was 18%.

Greenland Turbot:

1988 ABC = 14,100 t

1989 ABC = 20,300 t

Projected 1989 exploitable biomass = 375,800 t  
Exploitation = 5.4 percent; F0.1 rate

The exploitable biomass of Greenland turbot is probably below average level, and declining. As such, a low F0.1 exploitation rate is again applied to calculate ABC for the species in 1989. This rate, however, has been recalculated based upon a more realistic value of recruitment coefficient than was used in the draft RAD, and is now equal to 5.4 percent. Poor recruitment has been observed throughout the 1980s which indicates that abundance of the adult population is expected to decline well into the 1990s. Because of this poor recruitment pattern, forecasts for all conservative fishing strategies (including no fishing) show projected declines in biomass through 1993, or later.

Arrowtooth Flounder:

1988 ABC = 109,500 t

1989 ABC = 163,700 t

Current exploitable biomass = 528,200 t  
Exploitation = 31 percent; Fmsy rate

The resource continues to be in excellent condition and biomass continues to be high and stable, if not increasing. This trend is again confirmed from the 1988 summer trawl survey. Because of higher estimation confidence, the current exploitable biomass is estimated to be at the mid-point of it's 95% confidence range (528,200 t), instead of it's lower confidence limit for 1987 (414,000 t). The MSY exploitation proposed (31%) is essentially similar to the rate used last year (29%). The small difference is the result from updating model parameters.

Rock Sole:

1988 ABC = 166,000 t

1989 ABC = 171,000 t

Current exploitable biomass = 1,277,900 t  
Exploitation = 13 percent; Fmsy rate

For the first time, rock sole is separated out from the "other flatfish" category for management purposes. Trawl surveys confirm that the biomass of rock sole is high and continuing to increase. The resource is in excellent condition and biomass is above the level that produces MSY. Therefore, the MSY exploitation is applied to calculate ABC for the species. The slight decrease in the 1989 ABC estimate from 1988 reflects a lower exploitation rate used this year (13% versus 15.5%), rather than a decrease in biomass.

Other Flatfishes:

1988 ABC = 165,900 t

1989 ABC = 155,900 t

Current exploitable biomass = 1,187,060 t

Exploitation = 13 percent, Fmsy rate for flathead sole and Alaska plaice.

Exploitation = 15.5 percent, Fmsy rate for miscellaneous flatfishes.

Biomass for this category of flatfishes is high and increasing. It is above the level capable of producing MSY; thus their MSY exploitation rates are used to estimate ABCs. The increase in the 1989 ABC reflects an increased abundance of the stocks.

Sablefish:

EBS            1988 ABC = 3,400 t  
Aleutians    1988 ABC = 5,800 t

1989 ABC = 2,800 t  
1989 ABC = 3,400 t

EBS            Current exploitable biomass = 25,300 t  
 Exploitation = 11%; F (equilibrium biomass) rate

Aleutians     Current exploitable biomass = 68,000 t  
 Exploitation = 5%; F (equilibrium biomass) rate

The ABC for 1989 is reduced from 1988 due to an overall decrease of the biomass in the EBS. The 5% exploitation rate corresponds to the F(eq) rate--the rate that is expected to keep the biomass in equilibrium. Changes from the draft RAD include the use of results from the 1988 longline survey which show a less drastic decrease in EBS biomass from 1986 and a new decline in the Aleutian Islands.

Pacific Ocean Perch:

EBS	1988 ABC = 6,000 t	1989 ABC = 6,000 t
Aleutians	1988 ABC = 16,600 t	1989 ABC = 16,600 t

EBS            Current exploitable biomass = 101,100 t  
 Exploitation = 6 percent; F0.1 rate

Aleutians     Current exploitable biomass = 276,500 t  
 Exploitation = 6 percent; F0.1 rate

In general, POP stocks continue to remain low but relatively stable compared to biomass levels of the early 1960s. No new data are available to change, nor is any expected to change, the 1989 ABC levels from the estimates for 1988. The F0.1 exploitation strategy at 6% is expected to provide for some rebuilding of the POP complex of stocks.

Other Rockfishes:

EBS	1988 ABC = 400 t	1989 ABC = 400 t
Aleutians	1988 ABC = 1,100 t	1989 ABC = 1,100 t

EBS            Current exploitable biomass = 7,100 t  
 Exploitation = 6 percent; F0.1 rate

Aleutians     Current exploitable biomass = 18,500 t  
 Exploitation = 6 percent; F0.1 rate

Maintenance of ABCs at 1988 levels continue to reflect the relative stability of the stocks. As with the 1988 estimates, the mean biomass derived from recent years' trawl surveys were used to estimate ABCs. Because there are insufficient data for this complex, the exploitation rate was based on the F0.1 exploitation strategy derived for POP. Also, like the POP complex, this strategy is expected to promote rebuilding for the "other rockfish" category.

Atka Mackerel:

1988 ABC = 21,000 t

1989 ABC = 21,000 t

Current exploitable biomass was not determined  
Exploitation based on F0.1 strategy

The status of stocks for Atka mackerel is difficult to assess because surveys that cover it's range in the Aleutian region are conducted only once every 3 years. The latest survey in 1986 indicate that biomass decreased 74% from 1983 and was even lower than the estimate from 1980. The absolute level of biomass, however, cannot be accurately estimated. As such, estimation of ABC using  $F \times \text{Biomass}$  cannot be applied. Instead, the F0.1 concept of exploitation from catch-at-age analysis using recent trends (1982-86) in weak recruitment was used to estimate ABC. This analysis, performed last year, estimated the 1988 ABC at 21,000 t. Since new information is not available to re-analyze the data, and catch trends in 1988 indicate that the stock has probably not changed appreciably from last year, the 1989 ABC is again recommended to be 21,000 t.

Squid:

1988 ABC = 10,000 t

1989 ABC = 10,000 t

There is insufficient information to determine abundance and appropriate exploitation rates for squid stocks. The estimate of ABC is based on historical catches and is conservative.

Other Species:

1988 ABC = 49,500 t

1989 ABC = 59,000 t

Current exploitable biomass = 673,600 t  
Exploitation = 9 percent = Historical rate

The change in ABC from 1988 to 1989 reflects the change in biomass determined from trawl surveys. The biomass has essentially remained relatively high.

REFERENCES

International Council for Exploration of the Sea (ICES). 1984. Reports of the Ad Hoc Working Group on the use of effort data in assessments of the working group on methods of fish stock assessments. Int. Counc. Explor. Sea Coop. Res. Rep. 129, 134p.

Sissenwine, M.P. and J.G. Shepherd. 1986. An alternative perspective on recruitment overfishing and biological reference points. Can. J. Fish. Aquat. Sci. (in press).

Table 6.--Estimates of maximum sustainable yields (MSYs) and comparisons of acceptable biological catches (ABCs) for 1988 and 1989 for groundfish in the eastern Bering Sea (EBS) and Aleutian Islands.

Species/Region	MSY (t)	ABC (t)	
		1988	1989
Pollock			
EBS	2,300,000	1,500,000	1,340,000
Aleutians	245,000	160,000	117,900
Area 515	unknown	N/A	250,000
Pacific cod	323,300	385,300	370,600
Yellowfin sole	150,000	254,000	241,000
Greenland turbot	22,500	14,100	20,300
Arrowtooth flounder	55,300	109,500	163,700
Rock sole	112,500	166,000	171,000
Other flatfish	123,300	165,900	155,900
Sablefish			
EBS	2,200	3,400	2,800
Aleutians	8,800	5,800	3,400
Pacific ocean perch			
EBS	7,400	6,000	6,000
Aleutians	18,900	16,600	16,600
Other rockfish			
EBS	500	400	400
Aleutians	1,300	1,100	1,100
Atka mackerel	38,800	21,000	21,000
Squid	> 10,000	10,000	10,000
Other species	59,000	54,000	59,000
<b>Total all species</b>	<b>3,478,800</b>	<b>2,873,100</b>	<b>2,950,700</b>



Table 7.--Summary of stock abundance and ABC estimates for groundfish in the eastern Bering Sea (EBS) and Aleutian Islands (AI) for 1989.

Species/Region	Biomass (t)	Annual Exploitation (%)	ABC (t)	Abundance and trend
Pollock EBS	5,300,000	25.3	1,340,000	Moderately high, moderate decline
AI	471,700	25	117,900	Moderately high, stable
Area 515	1,000,000	25	250,000	Unknown
Pacific cod	1,190,000	31.1	370,600	Very high, stable
Yellowfin sole	1,530,000	15.8	241,000	Very high, stable
Greenland turbot	375,800	5.4	20,300	Average, declining
Arrowtooth flounder	528,200	31	163,700	Very high, stabilizing
Rock sole	1,277,900	13	171,000	Very high, increasing
Other flatfishes	1,187,100	15.5	155,900	Very high, stable
Sablefish EBS	25,300	11.2	2,800	Average, declining
AI	68,000	5	3,400	Average, declining
Pacific ocean perch EBS	101,000	6	6,000	Below average, slow increase
AI	276,500	6	16,600	Below average, slow increase
Other rockfish EBS	7,100	6	400	Average, stable
AI	18,500	6	1,100	Average, stable
Atka mackerel	--	--	21,000	Below average, trend unknown
Squid	--	--	10,000	Unknown
Other species	673,600	9	59,000	High, stable
<b>Groundfish complex</b>	<b>&gt;14,030,700</b>		<b>2,950,700</b>	<b>High, stable</b>



December 3, 1988

Clarence Pautzke  
Executive Director  
North Pacific Fisheries Management Council  
P.O. Box 103136  
Anchorage, AK 99610

RE: R.A.D. 1989 BSA Groundfish - Comments

Dear Clarence:

We thank the Council for this opportunity to comment. Our comments will focus mainly upon pollock and will touch upon stock assessments, resultant ABC recommendations on through TACs and the Optimum Yield. In accordance with the public comment process preparatory to establishment of TAC's for 1989 in the Bering Sea/Aleutians, we are writing to express AHSFA's view that 1989 BSA Pollock TAC be set at least equal to the 1,707,900 mt recommended by the Plan Team for the three management areas: Eastern Bering Sea, Aleutians, and Area 515. From the scientific evidence presented thus far it appears that the TAC for pollock could comfortably be set above this level, somewhere between 2.0 and 3.0 mmt. Notwithstanding the present OY cap, we feel the pollock OY component ought not to be set below this level.

It is, we trust, incumbent on the Council to manage the fisheries of the North Pacific in accordance with the best scientific evidence. During the past ten years management of the Pollock stocks in both the Bering Sea and Aleutians has, for a variety of reasons been overly conservative. An unduly conservative bias also exists in the recommended ABC's for 1989. There is no biological reason for reduction of the Pollock TAC's below that level. The 1989 ABC numbers, we understand from the scientists, are well on the low side and could be raised without biological harm to the fishery.

In recent seminars on the RAD conducted by scientists we were apprised of shortcomings of: previous stock assessments, data inputs to them, applications of these to the models, model tuning problems and resultant projections of biomass and estimates of ABCs. Corrections for these shortcomings have resulted in conservative TACs in the past and in the present ABC recommendations.

## EBS

We learned that these factors have contributed to the now doubtful declining biomass trends of recent years. The present actual preliminary biomass survey result, we are told, is at a level of 11.0 mmt. Over 4.0 mmt above the projected 1988 level upon which the present 1.34 mmt ABC was estimated. The sampling upon which these facts are based is restricted to an on-shelf part of the Bering Sea not off shelf. The ABC then could be considerably higher. Perhaps 2.0 mmt or more. Alleged illegal high seas catches make the case for a raised offshelf EBS component even more compelling. The ABC for the Aleutians could, it appears, also sustain a level of at least 250,000 mt.

## Area 515

The arguments, based on age 9 fish, postulating a relationship between fish from the 'donut', 515 and Aleutians are noted. Whilst the apparent suggestion for a separate area ABC may not be administratively practical, we feel it is certainly reasonable and desirable to apportion an extra 250,000 mt to the EBS ABC recommendation. Not to recognize this offshelf component has a number of apparent ramifications. Fish caught elsewhere would be debited against the on-shelf EBS component resulting in a drastic underutilization of this portion of the resource and a loss to the fishery. In this regard the dislocatory effects to the present participants in the fishery are likely to be more rather than less.

Also, artificially suppressing the U.S. FCZ harvest, in effect, creates more fish for the foreign high seas operations in the international donut fishery, and out of U.S. control.

## The OY CAP

But, establishment of the 1989 TAC's at least equal to or greater than the Plan Team's recommended ABC levels will immediately bring the Council afoul of the 2.0 million mt OY cap established in Amendment 1 to the BSA groundfish plan. That this cap is no longer a valid management tool is clearly evidenced by the status of the BSA resources and the U.S. fishery. We have detailed our views on this cap, and the need for its removal, at length in various deliberations over the past 12 months. The sum of the ABCs for the complex in 1989 approaches 3.0 mmt which is recognized by the scientists as being a conservative estimate. The present OY cap level is seriously in question. We submit this ought to be recognized as a priority by the managers and the cap raised.

We are concerned over the possible outcome of management action based upon the statement that Pollock shows a trend towards moderate decline. To the extent this trend is incorrect and in fact is toward an increase, we fear for the following scenario. In an attempt to make the sum of the ABCs fit the present OY cap, approximately 1 mmt has to be removed from the complex. If pollock is the only specie with a stated declining trend the inclination may be to conserve it.

Further, with projected DAP requests possibly spelling the death knell for the JVP fisheries comes an end to one of the most reliable sources for data on the fishery for management. In this sense the present OY cap precipitates a rather dire and costly consequence for management.

Socio economic considerations:

In respect of socio-economic factors to be considered in establishing TAC's the greatest overall benefit to the nation will be achieved by setting the BSA Pollock TAC at least equal to the 1,707,900 mt ABC recommended by the team. There is fairly compelling evidence to suggest the stock could sustain a higher TAC of 2 - 3 mmt without biological damage. With NMFS indicating 29 new DAP vessels coming on line the social compulsion to raise the TAC and the OY becomes greater. However when one considers the potential effects of locking out those U.S. catcher vessels now in the fishery the social consequences of not attempting to do so become draconian. Certainly the permit species requests of foreign nations are a reflection of the market they are willing to provide U.S. fisherman and the fishery. At \$142 per ton withheld from the JVP U.S. fisherman an indication of the effect on those of the 90 - 125 vessels without a DAP umbrella for pollock may be gauged. Some of the socio economic effects have been touched upon, others in favor of maximized Pollock harvest in the Bering Sea and Aleutians during 1989 are:

1. With the elimination of all TALFF on Pollock, all harvests in the F.C.Z. are now accomplished by U.S. fisherman; failure to set the TAC at above the recommended ABC level will have the negative and unwelcome effect of denying employment and income to U.S. citizens.
2. Current depressed levels of the dollar have created unique, and greatly needed, export opportunities for U.S. fish and seafood products. This competitive advantage should be exploited to the fullest and it will not be disturbed by the marginal supply increases that will result from establishment of the Pollock TAC at the recommended ABC level or above. Recognizing the ample alternative supplies of Pollock and Pollock substitutes that are presently available to foreign users, we cannot hope to create "market voids" by failing to allow the harvest of the full ABC's.

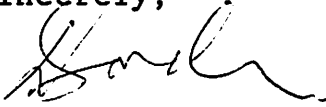
For the same biological and socio-economic reasons AHSFA recommends:

1. Setting the Yellowfin Sole TAC equal to the ABC or 214,000 mt.
2. Setting Pacific Cod TAC equal to the ABC of 370,000 mt.
3. Removing the OY cap and setting the Pollock TAC at 2.5 mmt or greater.

We will prepare to testify at the December Council meeting regarding 1989 apportionments of the Pollock TAC to DAP & JVP.

Thank you for the opportunity to review the draft RAD and comment on TAC determination levels.

Sincerely,

A handwritten signature in cursive script, appearing to read "Doug Gordon", written in black ink.

Douglas B. Gordon  
Executive Director

# Mrs. Paul's<sup>®</sup>

5501 TABOR ROAD, PHILADELPHIA, PA 19120 • 215-535-1151

## KITCHENS, INC.



North Pacific Fishery Management Council  
P.O. Box 103136  
Anchorage, Alaska 99510

Attn: Mr. John Peterson, Chairman

Dear Mr. Peterson:

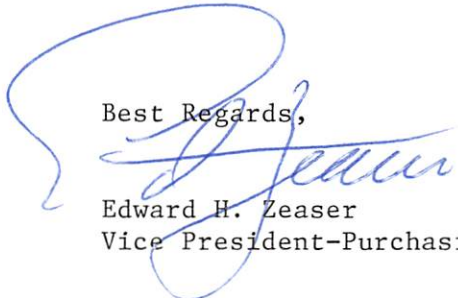
Attached is a written copy of the testimony that I presented before the Council, during the December, 1988 meeting. Our testimony covered ground fish and joint venture issues.

We thank you and the Members of the Council for the courtesy extended to me during my presentation. We realize the Council has many critical issues which need quick resolution. Your responsibility appears awesome and we wish you well. Should you determine a way which you feel Mrs. Paul's can help in your efforts, please feel free to call on us.

Finally, we noted in your final deliberations, you addressed our major points of concern, for which we are grateful.

We at Mrs. Paul's extend to you, Members of the Council and Staff our very best wishes for a joyous holiday season, and a happy prosperous and healthy New Year.

Best Regards,

  
Edward H. Zeaser  
Vice President-Purchasing

ACTION	ROUTE TO	INITIAL
CM	Exec. Dir.	M
	Deputy Dir.	
	Asst. Dir.	
	Exec. Sec.	
	Staff Asst. 1	
	Staff Asst. 2	
	Staff Asst. 3	
	Ext. Affairs	
	Finance	
	Legal	
	Public Affairs	
	Rec. Mgmt.	
	Training	
	Off. Liaison	
	Telephone Rm.	
	Director's Sec'y	
	Director's Office	

December 12, 1988

EHZ:sb

TESTIMONY BEFORE THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL DECEMBER MEETING

DATE OF PRESENTATION: DECEMBER 7, 1988

Mr. Chairman/Members of the Council

My name is Edward Zeaser, Vice President of Mrs. Paul's Kitchens, Inc. located in Philadelphia, a subsidiary of Campbell Soup Company. I am here to give our viewpoint on the effects of Americanization of the seafood processing industry: what we like, what we worry about, what we are doing, and where we need help, and finally to express our needs for some measure of Joint Venture processing allowed to foreign suppliers.

We support Americanization. If representatives from our growing number of domestic processors operating here in the Northwest Pacific Region were with us, they would surely collaborate the fact that Mrs. Paul's efforts to enhance the value and marketability of their products is second to none. This would include shore based processors and factory vessels from whom we are buying. The areas of support have been accomplished through technical exchange, small investments and a unique in-process control system which builds in quality rather than inspects it in. This process enables suppliers to avoid cluttering their freezer with unsaleable merchandise. Finally, nearest and dearest to the hearts of our suppliers, we do guarantee long term delivery schedules which they can count on.

The major advantage that we see to dealing with American processors here in the Northwest Pacific Region is that it enables us to keep inventories at a minimum and helps us get product to the consumer very quickly from the day the fish is caught.

We well recognize the rights of domestic processors having made the investment and took risks, to be entitled to security of supplies. We also made investment and took risks. Last year we spent in excess of \$45,000,000.00 in plant improvements, product development, marketing and promotion activities, thus our company has made a major committment to be in the seafood business

Our competition for market share and shelf space is intense and is becoming more so. We need uninterrupted supply of our most important ingredient pollock fillet blocks to ensure our place in the supermarket shelf. Should we fall short, our products could very well be placed with non-seafood items, which is not good for us or our suppliers.

Our major concern is that we estimate the production capacity, or will to produce pollock fillet block, totals about 40,000,000 pounds out of the domestic processing operations. We estimate this is half of what our industry needs. The exclusion of foreign processing vessels from the U.S. Economic Zone will make it more difficult for us to source the additional pollock block we at Mrs. Paul's and our industry needs. We further worry about the expertise to make fish blocks is not keeping pace with the rapidly expanding capital equipment. Were not talking about issues of wholesomeness or taste, were talking about items that cost us money ie. yields. A poor fish block leads to waste of this valuable resource at our end and thus loss of value.

I can't dispute domestic requirements for pollock or current management policies. However, I feel it reasonable to ask that the Council closely monitor domestic pollock harvest/process activities on a quarterly basis and make timely releases to our traditional suppliers in Korea and Poland for Joint Venture process in the U.S. Economic Zone should domestic efforts fall short of expectation.

At the moment, we have a balanced supply from well qualified domestic and foreign sources. We need this to continue as long as possible. The in-process control procedures training the crews within the domestic fleet takes time to develop. We are willing to expend the effort, however, I must say traditional suppliers are past this point of expertise.

My next concern is the issue of waste which we hear of that occurs on the fishing grounds. We believe a policy should be established to account for quantities and the reason for this waste. One factor contributing to this waste we understand is that processors discard small fillets. We can utilize these small fillets in new rapidly growing requirement for raw material needed by our operation. Domestic processors who are producing and selling this new product made from fillets which would otherwise be discarded, are enthusiastic. No doubt the issue of waste causes you to be ultra conservative in determining allowable catch levels.



It scares me to hear terms such as, "we have insufficient data", "we have no confidence in the data", and so forth, from those who must calculate the size of the resource and recommend allowable harvest levels. We all know the consequences if poor data results in bad management decisions. We believe all of us in the industry should share the cost in some form to insist that adequate data collection and observers are required for both domestic vessels as with foreign vessels.

Finally, the possible adverse affects on the issue of by-catch for prohibited species on the much larger pollock harvest efforts makes me shudder as the Officer responsible for acquiring raw materials to meet our needs. This issue creates uncertainty which makes it difficult for us to plan. I can't propose a solution other than insisting that a program of reliable data collection is established.

In closing, the United States domestic seafood industry, as it increases its utilization of our seafood resource, also incurs an increasing awesome responsibility to convert this resource into products attractive to the ultimate consumer. We believe Mrs. Paul's can help share this responsibility if we do our job right. The key to doing our part, is being able to insure ourselves of uninterrupted suppliers of pollock block at the right price, the right quality, at the right time, over a long term period.

We as a major customer of the products sourced in your Region, share with you a common boss to please, the person who finally consumes the products. We have a common competitor and that is all other protein foods. We in the seafood business as you all know, are last in per capita consumption among major protein foods.

Much of what I told you is Mrs. Paul's responsibility to address, however, we are significant customers of the fishery you manage. We trust you will consider our needs in your deliberations. Thank you.