Testimony of Edward Naughton before the North Pacific Fisheries Management Council. Homer, Alaska June 28th, 1979

Mr. Chairman, members of the Council, my name is Edward Naughton and my adress is Box 1911, Anchorage, Alaska 99510. I work for the Korea Marine Industry Development Corporation (KMIDC). I want to talk briefly about the agenda items concerned with the Gulf of Alaska FMP for groundfish.

Item #9. Guidelines for extimation of Domestic Annual Harvest and Processing Capacity.

Estimating DAH and DAP can only be accomplished by determining the amounts of product by species that are sold or to be sold by the processors within the regulated year. It is axiomatic in commerce that nothing happens until someone sells something. In the case of fish, until the fishermen knows the quantity of product the processor will buy, her hase no way of knowing the quantity necessary to gear up for. The harvest quantity depends upon the DAP requirement to meet sales committments.

Therefore, it is necessary to ascertain with real accuracy the amount of product that each processor has committed to buy and sell. Each processor's indicated capacity must be measured against sales contracts and past records of sales plus comparisons of quality and price.

Another important consideration is the extent that processors are affiliated or associated with corporations that import foriegn caught product. The amount of foriegn caught fish which will be imported has a profound impact on the quantities of U S caught

fish which the U S fishing industry will use.

No preferential treatment should be given to any company that is connected with the import of foreign caught fish products, to do otherwise would fail to meet the purposes spelled out in the FCMA, Sec. 2, (b) (6) which seeks "to encourage the development by the US fishing industry of fisheries which are currently underutilized or not utilized by United States fishermen, including bottomfish off Alaska."

Item #10. Reduction of DAH. During these early years the DAH
should be available to US fishermen for sale to joint venture

processors if DAP capacity is overestimated. This flexibility is reselved
to counter balance the one way flow to TALFF. Fish can go to TALFF but not
come back.

Item #11. Release of reserves to TALFF. KMIDC is prepared to

purchase all the pollock and by-catch that US fishermen are willing
to catch. We anticipate the delivery of at least 36,000 mt of

pollock and by-catch by the end of the fishing year. We would urge
that at least that amount be retained in the reserves. If the
foreign nations find they need more allocation, you might suggest
that they buy these tonnages from US fishermen.

We are opposed to attempts to close areas to fishing for or operations by joint ventures. You must consider the regulations promulgated to implement the FCMA are required to meet certain tests, called National Standards for Fishery Conservation and Management, and are found in Section 301 of the FCMA. I hasten to point out that Congress did not amend these standards when

Item #12. Closure of areas to joint venture operations.

Section 301 (a) provides "In General- Any fishery management

PL 95-354 was enacted.

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plan prepared, and any regulation promulgated to implement such plan, pursuant to this title shall be consistent with the following national standards for fishery conservation and management:

(3) To the extent practicable, an individual stock of fish shall be managed as a unit throughout its range, and interrelated stocks of fish shall be managed as a unit or in close coordination." In this, Congress has mandated that management regulations are to focus on the fish, where ever they go--as opposed to drawing lines on a map or chart to which do not pay h eed. This philosophy is reinforced in Sec 301 (a) (5) which provides "Conservation and Management measures shall, where practicable, promote efficiency in utilization of fishery resources; except that no such measure shall have economic allocation as its sole purpose." And further reinforcement in 301 (a) (4) (B) which provides "... If it becomes necessary to allocate or assign fishing privileges among various United States fishermen, (those who sell to joint ventures and those who do not sell to joint ventures) allocation shall be ... (B) reasonably calculated to promote conservation; emphasis provided. Drawing lines on a map to protect the economics of a processor must meet conservation goals, not economic goals. As to the above cited 301 (a) (5), which requires regulations encourage the promotion of efficiency, I remind you of the analysis by the North Pacific Vessel Owners Association done in 1977 which shows the efficiency lost to fishing vessels that deliver to shore plants as compared to at-sea delivery to processing vessels. Joint venture processor ships provide that efficiency to US catcher vessels. To exclude JV's in an area would remove that efficiency from that area.

Any attempt to draw lines to exclude JV's would be required to observe the requirement in 301 (a) (4) (C) which provides "...If

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්රුවුන්ගේ සහසම් විශ්නයි. එක් වියේන්තු විශ්නුතු සුල් සලුල්දේශවල් පළමුණු මැත්ත විසින් විධාන්තුන්ගේ සෙදවිණ ការស្រាក់ដីវិកា ការដែលដីដីក្នុងការស្នាក់ស្នាក់ ស្រុក ស៊ី ing a transportation in the contraction of the cont න්ත්රම් විසර න්තුරුණක වර්ෂණ ද්රාවේඛයාව විසර්මාන්ත් වෙන්දා ක්ෂේෂණ වෙන්දා කරන දින និងជាស្ថានបានជាប់ស្ពៃ និស្សន៍ ខេត្តប្រាស់ ខេត្តដែលបន្តិបុស្សក្រាស់ ជាដែល នេះខែងប្រើការ ឧក្សាស័យ មិស៊ី ធ្វើអ៊ីនីអ៊ីន ්සර්ථකයද්වියන්දම් මේවේ. මේවේන්ත් ස්ක්ෂයේ මේ මේවේම්නෙක්සේ මේ විවෘත්වේ වීම මේ. මේවීම් වීම ෙසේ සහස් සහස්වයන්දීම්පයට දේශද් හාස්යන්දීම එයෙස් ව්යස්ථාවීම සහස්වේදීම් සෙවැන්වේදීම් සහස්වේදීම් වෙදීම් විද් ්දෙන්න්න් පිළුවිතුළතුවී කෙරු විදෙදෙන්නට නොමනක් ගත්ත්ත්ත් කළුන දෙනිසන්දෙන නිවාවීම පවත් ගතු දෙනකුදුම් v_i eigespo v_i i vie v_i e v_i i v_i e v_i eige v_i eige v_i eigespo v_i eige v_i in a consider the supply - we is imposed for $M^{(2)} = 10^{100} \pm 200$, $\pm 60^{100} \pm 100$ in this parable is small Aod spragdelije jedopoga 4. sijijanddostri jeda in 1916. gagan og pagagaan dalariggskeji ីងលាស់ស្គារ នៅសម្រាប់ សន្នាំ ស្ត្រីស្ត្រីស្តេចស្តែក មានមានសម្រេច ស្ត្រីស្ត្រី ស្តែក ស្តែកិច្ចិត្តិ ស្តែកិច្ចិត วิทย์ภูหิจะครองกฤก อน้อย อที่บ้ายส่วนอน้าของมีวัด อน้าขอมอกกายพลที่นี้ได้เพื่ $\mathbb{R}^{d_{i}}(\Omega)$ -reduced for $(\Omega)(\Omega)(\Omega)$ $(\Omega)(\Omega)$ id (social inimporation) in all corte or easim. The inimporation in tinioi ot liina oligepoit) (megantiii) entetti liine patiet liine pii ta o majidandijLa stekuniyev nobod od LLejej dom atij bija k $ar{a}$ oziji. Tay netuvim sandinavide con different of definition of the control of the cont airijassis innordišai. – Igeriiro liineks on a ran ja pajantoi tia adtotia alka ្នាត់ពីទីកុម្ភាស់ពេលពេកនេះ ជាពេញ មួនដីខ្ញុំសម្គារពេធនៃកែស្រាស់ ស្នងសម្រាស់ ស្នងសម្គេច សេចសម្គេចសម្គេច សេចសម្គ នរប់ទៅនឹងសុខ ៥០៧, និង ២០១ ប្រឹស្សិទេស 🖫 (១០សស់ព្ទះវិទី) ១ និង 😿 វិទី០ រប់រប់១១០១១ ១៩២ សម្រួយមានសុខ ijažimijt (1911. isž. anj.) iražiriažavest irisepri). Iesepti atiširas istrati eroje či govillok in i sloesor prilikil si deoloje solije od jedlje golje. tairis (enlengy painterrotte ot symenijas integrite et Tenerion in etaklej lebrer ublibbeb 77 od vorgir ilike bolibelikuburg of i ibj<mark>usereno</mark>m etmirjev ුන් අපත්ත්ව මෙන්ව වෙනුවේ. මෙන් අපත්ත්ව සම්බන්ත සම්බන්ත සම්බන්ත සිටුන් මේ මිනිස් මේ මෙම වෙනුවේ. මෙන් සම්බන්ත ම In this case of this case $s^{1/N}$ is independent and resulting $rac{\partial}{\partial t}$ which is the calculate t t t

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If you draw a line for two processors, and two months into the year one of them reaches his production target quantity, would you erase the line when only one plant was within the line?

Section 3, (2) "... The term "conservation and management" refers to all of the rules, regulations, conditions, methods, and other measures... (B) which are designed to assure that--...(iii) there will be a multiplicity of options available with respect to future uses of these resources. " Any attempt to draw lines to exclude JV's from areas reduces the options available with respect to these resources.

When PL-95-354 was being considered by Congress, many schemes such as this one were put forward but Congress did not adopt them.

PL 95-354 provides for foreign fish processor vessels in the Fishery Conservation Zone and requires that the Secretary determine the DAP and DAH and that those quantities be reserved from the OY and not available to the TALFF. That is the extent to which Congress contemplates US preference in the FCZ. The processors cannot have it both ways, they cannot import cheap foreign caught fish, against which the US fishermen must compete, and then use the regulatory process to set themselves up as the only market for US fishermen so that they can dictate the conditions on which the US fishermen may produce bottomfish to compete with their imported product.

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