


MEMORANDUM

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke 
Executive Director

DATE: July 30, 1992

SUBJECT: Amendment 18 Inshore-Offshore Allocation of Pollock in the BS/AI

ACTION REQUIRED:

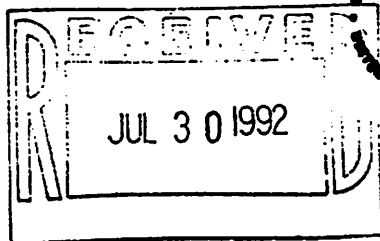
- (a) Receive staff summary of Amendment 18 supplementary analysis.
- (b) Receive AP and SSC reports.
- (c) Receive public comment on proposed alternatives and supplementary analysis
- (d) Select preferred alternative for Amendment 18.

The supplementary analysis of revised Amendment 18 alternatives was released by the Council for public review and comment following the June meeting. The analysis includes revisions directed by the Council addressing recommendations made by the AP and SSC, but no substantive changes have been made in the underlying data assumptions from the Council Draft presented in June. Members of the Analytical Team will be available to summarize the findings, discuss the sensitivity of the findings to key assumptions, and answer questions concerning the analysis.

The document is comprised of four parts: 1) a cost-benefit analysis; 2) an economic impact analysis; 3) an analysis of the catcher vessel operational area; and 4) a summary and update of pertinent findings from the original social impact assessment. The supplementary analysis was distributed to interested parties on July 10, 1992, allowing for a three-week review period prior to this meeting.

Written public comment on the supplementary analysis is contained in the supplemental materials. Related information submitted as a part of the public comment is available in designated Council Reference Binders.

Under the timetable suggested by Undersecretary Knauss, the Council is scheduled to select a preferred alternative at this meeting to submit for a 60-day Secretarial review, in order to have a plan in place for implementation early in 1993.

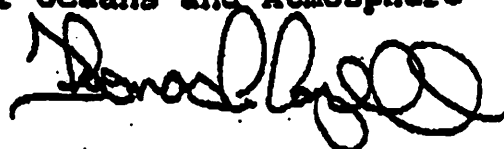


UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
Washington, D.C. 20230

OFFICE OF THE GENERAL COUNSEL

JUL 24 1992

MEMORANDUM FOR: John A. Knauss
Under Secretary for Oceans and Atmosphere

FROM: Thomas A. Campbell
General Counsel 

SUBJECT: Decision in AFTA v. Knauss

On July 23, Judge Barbara Rothstein granted the government's motions for partial summary judgment in American Factory Trawler Ass'n v. Knauss, No. C92-870R (W.D.Wash.). In a 21-page order, the judge found for the government on the issues argued in Seattle on July 14. This is not the end of the case; many Magnuson Act and NEPA issues are unresolved. In fact, the judge included a cautionary paragraph in her order (p. 5):

It is clear to the court that there are serious questions involved in this lawsuit which are not before the court on these cross-motions. The parties should be aware that the court is not deciding whether it was a violation of the Magnuson Act not to obtain public comment on the economic cost-benefit analysis contained in the final SEIS, or whether the draft SEIS and final SEIS were adequate....

NEPA issues

Plaintiffs had raised two procedural issues under the National Environmental Policy Act: (1) failure to circulate the cost-benefit analysis that was appended to the FSEIS; and (2) failure to release the final SEIS 30 days before the Day-95 decision on March 4. The government had raised plaintiffs' standing as a bar to NEPA claims (that is, plaintiffs' interests are economic in nature, not environmental). But the court declined to rule on standing, because the NEPA claims "do not state substantial procedural violations which would warrant invalidation of the regulations" (p. 4).

On circulation of the cost-benefit analysis, the court held the analysis related only to social and economic considerations under the Magnuson Act, not to environmental effects under NEPA. She said, "In this case the failure of the Secretary to obtain public comment on the cost-benefit analysis does not constitute a



departure from NEPA that warrants invalidating the regulations. Whether or not this failure represents a procedural flaw pursuant to the Magnuson Act that affects the validity of the regulations is an issue that is not before the court at this time" (pp. 6-7).

On the 30-day cooling period, the court clearly considered the agency's final decision to have occurred on Day 95, when Amendment 18 was partially approved and Amendment 23 was approved, and that the agency violated NEPA by not releasing the final SEIS 30 days before March 4. (The government had argued that issuing the final regulations on May 28 was the final agency action.) But the court noted that the final SEIS differed from earlier versions only by the addition of the cost-benefit analysis prepared by NOAA. All environmental concerns had been addressed earlier in the process. The procedural violation did not keep the agency from considering any possible harm to the environment, so "the timing defect is not substantial" (p. 13).

Magnuson Act issue

The American Independent Fishermen, intervening in the case, claimed the allocation to the "inshore component," which includes shore-based processors, was not authorized under the Magnuson Act. Citing references in the Act to support coastal communities dependent on nearby fisheries, the court found the allocation consistent with statutory purposes. She dismissed the argument under national standard 4 by saying "the allocation in effect assigns fishing privileges among fishermen" (p. 18). She cited other cases interpreting Magnuson Act authority broadly, and distinguished a 1989 opinion of NOAA General Counsel (the "roe-stripping" memo) on the basis that the challenged regulations do not purport to control the conduct of processors.

cc: Dr. William W. Fox, Jr.
Richard H. Schaefer
NMFS Regional Directors
Regional Attorneys

CURRICULUM VITAE

Arnold C. Harberger

Professor of Economics, University of California, Los Angeles
and
Gustavus F. and Ann M. Swift Distinguished Service Professor,
Department of Economics, University of Chicago (Emeritus since Oct. 1991)

Born: July 27, 1924; Newark, New Jersey
Marital Status: Married (Anita Valjalo, March 15, 1958); two children

Education

Johns Hopkins University, 1941-43
University of Chicago, 1946-49; A.M. (International Relations), 1947
Ph.D. (Economics), 1950

Career Academic Positions

Assistant Professor of Political Economy, Johns Hopkins University, 1949-1953
Associate Professor of Economics, University of Chicago, 1953-59
Professor of Economics, University of Chicago, 1959-76
Gustavus F. and Ann M. Swift Distinguished Service Professor in Economics,
University of Chicago, 1977 - 1991
Chairman, Department of Economics, University of Chicago, 1964-71; 1975-1980
Director, Center for Latin American Economic Studies, University of Chicago, 1965
- 1991
Professor of Economics, University of California, Los Angeles, 1984 -

Temporary Academic Positions

Research Assistant, Cowles Commission for Research in Economics, 1949
Visiting Professor, MIT Center for International Studies (New Delhi), 1961-62
Visiting Professor, Harvard University, 1971-72
Visiting Professor, Princeton University, 1973-74
Visiting Professor, University of California, Los Angeles, 1983-84
Visiting Professor, University of Paris, 1986

Consulting Positions -- International Agencies and Foundations

Economist, International Monetary Fund, 1950
Consultant and Lecturer, International Bank for Reconstruction and Development,
1963 -
Consultant and Lecturer, Inter-American Development Bank, 1968 -
Consultant and Lecturer, Asian Development Bank, 1971
Consultant, Organization of American States, 1970-72
Consultant, International Labor Organization, 1971-72

Consultant, The Ford Foundation, 1965-76
 Consultant and Lecturer, Caribbean Development Bank, 1978

Consulting Positions -- U.S. Government Agencies

Staff Consultant, President's Materials Policy Commission, 1951
 Consultant, U.S. Department of Agriculture, 1955
 Consultant, U.S. Treasury Department, 1962 -
 Consultant, U.S. Department of State (AID), 1963-77, 1984, 1986
 Consultant, U.S. Department of Commerce, 1965
 Consultant, U.S. Council of Economic Advisers, 1969-74
 Consultant, U.S. Department of Labor, 1976
 Consultant, U.S. Postal Service, 1976-78
 Consultant, U.S. Synthetic Fuels Corporation, 1982

Consulting Positions -- Foreign Governments

Consultant, Planning Commission, India, 1961-62; 1973
 Consultant, Ministry of Planning and Economic Policy, Panama,
 1965-76
 Consultant, Central Bank of Chile, 1959, 1966-69
 Consultant, National Planning Department, Colombia (through
 Harvard Development Advisory Service), 1969-71
 Consultant, Office of Planning and Budget, Uruguay, 1974-76
 Consultant, National Planning Commission, El Salvador, 1973-75
 Consultant, Ministry of Finance, Indonesia (through The Ford
 Foundation, 1975; (through Harvard Inst. for
 International Development), 1981-82, 1986
 Consultant, Department of Regional Economic Expansion, Canada,
 1975-77; Department of Migration and Employment, 1978-80;
 Department of Finance, 1981-83, Crown Management
 Corporation, 1985
 Consultant, Ministry of Finance, Bolivia, 1976
 Consultant, Ministry of Finance, Mexico, 1978-80, 1986, 1992
 Consultant, Central Bank of Paraguay, 1982
 Consultant and Lecturer, Central Institute of Finance and
 Banking, Ministry of Finance, People's Republic of China
 (through The World Bank), 1983.
 Consultant, Joint Commission on Tax Reform, Government of
 Mexico, 1987
 Consultant, Ministry of Finance, Government of Malawi, 1988
 Consultant, Presidency of the Republic, Dominican Republic,
 1989-
 Consultant, Ministry of Finance, Government of Venezuela, 1989-
 90
 Consultant, Central Bank of Uruguay, 1990
 Consultant, Central Bank of Nicaragua, 1990
 Consultant, Ministry of Finance, Government of Colombia, 1991

Honors, Awards, Board, etc.

Phi Beta Kappa
 Social Science Research Council Faculty Research Fellow, 1951-53; 1954-55
 Guggenheim Fellow (Universities of London and Cambridge), 1958
 Ford Foundation Faculty Research Fellow, 1968-68
 Fellow, Econometric Society
 Fellow, American Academy of Arts and Sciences
 Member, Board of Editors, American Economic Review, 1959-61
 Member, Board of Editors, Journal of Economic Literature, 1969-70
 Member, Research Advisory Board, Committee for Economic Development, 1966-68
 Member, Research Advisory Committee, Office of Scientific Personnel, National Academy of Sciences, 1961-65
 Member, Executive Committee, American Economic Association, 1970-72
 Doctor Honoris Causa (D.H.C.), University of Tucuman, 1979
 Special Ambassador, U.S. Department of State, 1984
 Named Honorary Citizen of San Miguel de Tucuman (Argentina), 1987
 Vice President, Western Economic Association, 1987-88
 Commissioner, International Commission on Central American Recovery and Development 1988-89
 Doctor Honoris Causa (D.H.C.) Pontifical Catholic University of Chile, 1988
 Doctor Honoris Causa (D.H.C.) Technological University of Central America, 1989
 Elected to membership in the National Academy of Sciences of the United States, 1989
 President, Western Economic Association, 1989-90
 Vice President and Chairman of the Advisory Board, Institute for Policy Reform, 1990-
 Vice President, American Economic Association, 1992.
 Elected to Membership in the Chilean Academy of Social Sciences (as a Foreign Honorary Member), 1992

Publications

Articles and studies in the fields of public finance, materials policy, economic theory, international trade, economic development and econometrics (see appended list for specific works).

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SINCE 1914

TO: PHELAW

202-331-9686

July 14, 1992

Clarence
Mr. Clarence Pautzke
Executive Director
North Pacific Fishery Management Council
P. O. Box 103136
Anchorage, AK 99510

Dear Clarence:

In reading the volumes of work done by your staff and the NMFS on inshore/offshore, I wanted to bring to your attention several questions that seem to keep coming up. They are questions that I am sure will likely be asked by the public, SSC and Council members. What I would like is a side by side report that would include the conclusions of the EA/RIR and what the conclusions would be given the following three changes.

1. Pollock Roe Product Mix. The model has the offshore sector having about two and a half times the roe product mix as the inshore sector. (0.7% inshore vs. 1.72% offshore) These figures were derived from 1991 data and may be partially explained by 'legal' roe stripping and the fact that roe recovery rates are usually better in the Bogoslof area where the factory fleet predominantly fished. For 1992, with Bogoslof closed, the inshore and offshore sectors achieved about the same product mix for pollock roe.

What are the impacts of equalizing the pollock roe product mix for the two sectors?

2. Pollock Surimi Recovery Rates. The model assumes and 18.3% surimi PRR for shorebased processors and 17.7% surimi PRR for the factory fleet. There are only two independent sources of recovery rate information I am aware of, the first is the OMB survey of 18% inshore and 13.7% offshore, The second is recovery figures extrapolated from 1992 "A" season observed harvest of about 18.6% inshore and 14.2% offshore.

What are the impacts of using OMB surimi product recovery data (or 1992 "A" season data) on the results of this cost/benefit analysis?

FAX

(206) 283-3341

LATITUDE: 47° 39' 36" NORTH

DIAL "A VESSEL"

(206) 283-7735

LONGITUDE: 120° 22' 55" West

3. Variable Costs. There have been a number of questions raised about not using the same OMB survey data regarding variable costs for offshore activities as was used for inshore activities.


What are the impacts of using parallel OMB survey data for the offshore sector exactly as it was used for the inshore sector when determining variable production costs?

4. General Questions

What is the theory that NMFS is using to determine that a portion of the payments made to processing labor at sea is an economic rent and not just compensation for high risk jobs?

Does it make sense that roe recovery should be nearly identical for 1993 through 1995, the years of this allocation for both inshore and offshore operations?

Sincerely,



Robert D. Alverson
Manager

RDA:cb

North Pacific Fishery Management Council

Richard B. Lauber, Chairman
Clarence G. Pautzke, Executive Director



Mailing Address: P.O. Box 103136
Anchorage, Alaska 99510

605 West 4th Avenue
Anchorage, Alaska 99501

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DOCUMENT TRANSMITTAL COVER SHEET

TO: Bob ALVERSON _____ (LOCATION)

FROM: J. CORNELIUS _____

Number of Pages (including this cover sheet): 7 DATE: 7/21

MESSAGE: _____

If any problems receiving, please call (907) 271-2809.

SUMMARY TABLE NMFS DATA

ALVERSON #1+#2+#3

-----ALTERNATIVE 3-----

-----CHANGE IN PRODUCER SURPLUS, LABOR RENTS UNIFORMLY DISTRIBUTED 0 - CHG IN CREW SHARE

ALLOCATION		YEAR			NPV
		1993 35/65	1994 40/60	1995 45/55	
INSHORE					
	VESSEL	\$7,896,505	\$12,277,758	\$16,859,011	\$33,029,742
	PLANT	\$30,597,486	\$48,810,276	\$87,023,065	\$131,309,865
	CREW	\$3,591,339	\$5,729,041	\$7,866,742	\$15,412,319
	TOTAL	\$41,885,330	\$66,817,074	\$91,748,819	\$179,751,926
OFFSHORE					
	VESSEL & PLANT	(\$35,075,241)	(\$55,953,361)	(\$76,831,480)	(\$150,528,261)
	CREW	(\$3,070,565)	(\$4,898,283)	(\$6,726,000)	(\$13,177,407)
	TOTAL	(\$38,145,806)	(\$60,851,643)	(\$83,557,481)	(\$163,703,667)
NET					
	VESSEL & PLANT	\$3,218,750	\$5,134,673	\$7,050,586	\$13,813,346
	CREW	\$520,774	\$830,758	\$1,140,742	\$2,234,913
	TOTAL	\$3,739,524	\$5,965,431	\$8,191,338	\$16,048,259

-----ALTERNATIVE 2-----

-----CHANGE IN PRODUCER SURPLUS, LABOR RENTS UNIFORMLY DISTRIBUTED 0 - CHG IN CREW SHARE

ALLOCATION		YEAR			NPV
		1993 30/70	1994 30/70	1995 30/70	
INSHORE					
	VESSEL	\$3,115,252	\$3,115,252	\$3,115,252	\$8,483,604
	PLANT	\$12,384,897	\$12,384,897	\$12,384,897	\$33,728,601
	CREW	\$1,453,837	\$1,453,837	\$1,453,837	\$3,958,615
	TOTAL	\$16,953,986	\$16,953,986	\$16,953,986	\$46,168,820
OFFSHORE					
	VESSEL & PLANT	(\$14,197,121)	(\$14,197,121)	(\$14,197,121)	(\$38,682,283)
	CREW	(\$1,242,848)	(\$1,242,848)	(\$1,242,848)	(\$3,384,583)
	TOTAL	(\$15,439,969)	(\$15,439,969)	(\$15,439,969)	(\$42,046,866)
NET					
	VESSEL & PLANT	\$1,302,828	\$1,302,828	\$1,302,828	\$3,547,922
	CREW	\$210,789	\$210,789	\$210,789	\$574,032
	TOTAL	\$1,513,617	\$1,513,617	\$1,513,617	\$4,121,954



ALVERSON

SUMMARY TABLE NMFS DATA

BASE RUN

-----ALTERNATIVE 3-----

-----CHANGE IN PRODUCER SURPLUS, LABOR RENTS UNIFORMLY DISTRIBUTED 0 - CHG IN CREW SHARE

ALLOCATION INSHORE	YEAR	YEAR			NPV
		1993 35/85	1994 40/60	1995 45/55	
VESEL PLANT CREW		\$7,698,505	\$12,277,758	\$16,859,011	\$33,029,742
		\$21,934,478	\$34,890,716	\$48,046,953	\$94,132,355
		\$3,591,339	\$5,729,041	\$7,866,742	\$15,412,319
	TOTAL	\$33,222,323	\$52,897,515	\$72,772,707	\$142,574,416
OFFSHORE					
VESEL & PLANT CREW		(\$45,197,740)	(\$72,101,157)	(\$99,004,574)	(\$193,967,215)
		(\$8,010,688)	(\$12,778,954)	(\$17,547,221)	(\$34,378,064)
	TOTAL	(\$53,208,428)	(\$84,880,111)	(\$116,551,795)	(\$228,345,279)
NET					
VESEL & PLANT CREW		(\$15,566,756)	(\$24,832,683)	(\$34,098,609)	(\$66,805,118)
		(\$4,419,349)	(\$7,049,914)	(\$9,680,479)	(\$18,965,745)
	TOTAL	(\$19,986,105)	(\$31,882,596)	(\$43,779,088)	(\$85,770,863)
			0.0%		

-----ALTERNATIVE 2-----

-----CHANGE IN PRODUCER SURPLUS, LABOR RENTS UNIFORMLY DISTRIBUTED 0 - CHG IN CREW SHARE

ALLOCATION INSHORE	YEAR	YEAR			NPV
		1993 30/70	1994 30/70	1995 30/70	
VESEL PLANT CREW		\$3,115,252	\$3,115,252	\$3,115,252	\$8,483,604
		\$8,878,241	\$8,878,241	\$8,878,241	\$24,177,653
		\$1,453,637	\$1,453,637	\$1,453,637	\$3,958,615
	TOTAL	\$13,447,131	\$13,447,131	\$13,447,131	\$36,619,872
OFFSHORE					
VESEL & PLANT CREW		(\$18,294,323)	(\$18,294,323)	(\$18,294,323)	(\$49,819,980)
		(\$3,242,421)	(\$3,242,421)	(\$3,242,421)	(\$8,829,917)
	TOTAL	(\$21,536,745)	(\$21,536,745)	(\$21,536,745)	(\$58,649,897)
NET					
VESEL & PLANT CREW		(\$6,300,830)	(\$6,300,830)	(\$6,300,830)	(\$17,158,723)
		(\$1,788,784)	(\$1,788,784)	(\$1,788,784)	(\$4,871,903)
	TOTAL	(\$8,089,614)	(\$8,089,614)	(\$8,089,614)	(\$22,030,025)

SUMMARY TABLE NMFS DATA

ALVERSON #1

-----ALTERNATIVE 3-----

-----CHANGE IN PRODUCER SURPLUS, LABOR RENTS UNIFORMLY DISTRIBUTED 0 - CHG IN CREW SHARE

ALLOCATION	INSHORE	YEAR	1993		1994		1995		NPV
			35/85	35/85	40/80	40/80	45/55	45/55	
	VESEL		\$7,696,505		\$12,277,758		\$16,859,011		\$33,029,742
	PLANT		\$30,188,370		\$48,157,838		\$66,126,905		\$129,554,132
	CREW		\$3,591,339		\$5,729,041		\$7,868,742		\$15,412,319
	TOTAL		\$41,476,214		\$66,164,437		\$90,852,659		\$177,998,193
OFFSHORE	VESEL & PLANT		(\$45,197,740)		(\$72,101,157)		(\$99,004,574)		(\$193,987,215)
	CREW		(\$8,010,688)		(\$12,778,954)		(\$17,547,221)		(\$34,378,084)
	TOTAL		(\$53,208,428)		(\$84,880,111)		(\$116,551,795)		(\$228,345,279)
NET	VESEL & PLANT		(\$7,312,865)		(\$11,665,761)		(\$16,018,657)		(\$31,383,341)
	CREW		(\$4,419,349)		(\$7,049,914)		(\$9,680,479)		(\$18,985,745)
	TOTAL		(\$11,732,214)		(\$18,715,675)		(\$25,699,136)		(\$50,349,086)
					-41.3%				

-----ALTERNATIVE 2-----

-----CHANGE IN PRODUCER SURPLUS, LABOR RENTS UNIFORMLY DISTRIBUTED 0 - CHG IN CREW SHARE

ALLOCATION	INSHORE	YEAR	1993		1994		1995		NPV
			30/70	30/70	30/70	30/70	30/70	30/70	
	VESEL		\$3,115,252		\$3,115,252		\$3,115,252		\$6,489,604
	PLANT		\$12,219,102		\$12,219,102		\$12,219,102		\$33,275,646
	CREW		\$1,453,637		\$1,453,637		\$1,453,637		\$3,958,615
	TOTAL		\$16,787,991		\$16,787,991		\$16,787,991		\$45,717,864
OFFSHORE	VESEL & PLANT		(\$18,294,323)		(\$18,294,323)		(\$18,294,323)		(\$49,819,980)
	CREW		(\$3,242,421)		(\$3,242,421)		(\$3,242,421)		(\$8,829,917)
	TOTAL		(\$21,536,745)		(\$21,536,745)		(\$21,536,745)		(\$58,649,897)
NET	VESEL & PLANT		(\$2,959,969)		(\$2,959,969)		(\$2,959,969)		(\$8,060,730)
	CREW		(\$1,788,784)		(\$1,788,784)		(\$1,788,784)		(\$4,871,303)
	TOTAL		(\$4,748,753)		(\$4,748,753)		(\$4,748,753)		(\$12,932,033)

SUMMARY TABLE NAMES DATA

ALVERSON #2

-----ALTERNATIVE 3-----

-----CHANGE IN PRODUCER SURPLUS, LABOR RENTS UNIFORMLY DISTRIBUTED 0 - CHG IN CREW SHARE

		YEAR			NPV
		1993 35/85	1994 40/60	1995 45/55	
ALLOCATION					
INSHORE					
	VESSEL	\$7,698,505	\$12,277,758	\$16,859,011	\$33,029,742
	PLANT	\$22,343,595	\$35,643,354	\$48,943,113	\$95,888,088
	CREW	\$3,591,339	\$5,729,041	\$7,866,742	\$15,412,319
	TOTAL	\$33,631,439	\$53,650,153	\$73,888,867	\$144,330,149
OFFSHORE					
	VESSEL & PLANT	(\$41,015,516)	(\$85,429,513)	(\$89,843,510)	(\$176,019,095)
	CREW	(\$7,339,954)	(\$11,708,974)	(\$16,077,994)	(\$31,489,592)
	TOTAL	(\$48,355,469)	(\$77,138,486)	(\$105,921,504)	(\$207,518,686)
NET					
	VESSEL & PLANT	(\$10,975,415)	(\$17,508,401)	(\$24,041,386)	(\$47,101,265)
	CREW	(\$3,748,815)	(\$5,979,933)	(\$8,211,251)	(\$16,087,272)
	TOTAL	(\$14,724,030)	(\$23,488,334)	(\$32,252,637)	(\$63,188,537)
			-26.3%		

-----ALTERNATIVE 2-----

-----CHANGE IN PRODUCER SURPLUS, LABOR RENTS UNIFORMLY DISTRIBUTED 0 - CHG IN CREW SHARE

		YEAR			NPV
		1993 30/70	1994 30/70	1995 30/70	
ALLOCATION					
INSHORE					
	VESSEL	\$3,115,252	\$3,115,252	\$3,115,252	\$8,483,604
	PLANT	\$9,043,836	\$9,043,836	\$9,043,836	\$24,628,609
	CREW	\$1,453,637	\$1,453,637	\$1,453,637	\$3,958,615
	TOTAL	\$13,612,725	\$13,612,725	\$13,612,725	\$37,070,827
OFFSHORE					
	VESSEL & PLANT	(\$16,601,518)	(\$16,601,518)	(\$16,601,518)	(\$45,210,052)
	CREW	(\$2,970,934)	(\$2,970,934)	(\$2,970,934)	(\$8,090,589)
	TOTAL	(\$19,572,452)	(\$19,572,452)	(\$19,572,452)	(\$53,300,641)
NET					
	VESSEL & PLANT	(\$4,442,430)	(\$4,442,430)	(\$4,442,430)	(\$12,097,839)
	CREW	(\$1,517,298)	(\$1,517,298)	(\$1,517,298)	(\$4,131,975)
	TOTAL	(\$5,959,728)	(\$5,959,728)	(\$5,959,728)	(\$16,229,813)

SUMMARY TABLE NMFS DATA

ALVERSON #3

-----ALTERNATIVE 3-----

-----CHANGE IN PRODUCER SURPLUS, LABOR RENTS UNIFORMLY DISTRIBUTED 0 - CHG IN CREW SHARE

ALLOCATION		1993	YEAR		NPV
			1994	1995	
INSHORE		35/85	40/80	45/85	
	VESSEL	\$7,698,505	\$12,277,758	\$16,859,011	\$33,029,742
	PLANT	\$21,929,365	\$34,982,558	\$48,035,751	\$94,110,409
	CREW	\$3,591,339	\$5,729,041	\$7,868,742	\$15,412,319
	TOTAL	\$33,217,209	\$52,989,357	\$72,761,505	\$142,552,470
OFFSHORE					
	VESSEL & PLANT	(\$37,624,638)	(\$60,020,258)	(\$82,415,873)	(\$161,467,060)
	CREW	(\$3,349,406)	(\$5,343,099)	(\$7,336,793)	(\$14,374,056)
	TOTAL	(\$40,974,043)	(\$65,363,355)	(\$89,752,667)	(\$175,841,116)
NET					
	VESSEL & PLANT	(\$7,998,768)	(\$12,759,939)	(\$17,521,111)	(\$34,326,909)
	CREW	\$241,933	\$385,941	\$529,949	\$1,038,263
	TOTAL	(\$7,756,835)	(\$12,373,998)	(\$16,991,161)	(\$33,288,647)
			-61.2%		

-----ALTERNATIVE 2-----

-----CHANGE IN PRODUCER SURPLUS, LABOR RENTS UNIFORMLY DISTRIBUTED 0 - CHG IN CREW SHARE

ALLOCATION		1993	YEAR		NPV
			1994	1995	
INSHORE		30/70	30/70	30/70	
	VESSEL	\$3,115,252	\$3,115,252	\$3,115,252	\$8,483,804
	PLANT	\$8,876,171	\$8,876,171	\$8,876,171	\$24,172,016
	CREW	\$1,453,637	\$1,453,637	\$1,453,637	\$3,959,615
	TOTAL	\$13,445,061	\$13,445,061	\$13,445,061	\$36,614,235
OFFSHORE					
	VESSEL & PLANT	(\$15,229,020)	(\$15,229,020)	(\$15,229,020)	(\$41,472,399)
	CREW	(\$1,355,712)	(\$1,355,712)	(\$1,355,712)	(\$3,691,939)
	TOTAL	(\$16,584,732)	(\$16,584,732)	(\$16,584,732)	(\$45,164,338)
NET					
	VESSEL & PLANT	(\$3,237,597)	(\$3,237,597)	(\$3,237,597)	(\$8,816,778)
	CREW	\$97,925	\$97,925	\$97,925	\$268,675
	TOTAL	(\$3,139,671)	(\$3,139,671)	(\$3,139,671)	(\$8,550,103)

Shorebased Processor

Total for Season to Date (July 5, 1992) — Shorebased
Metric Tons

Retained Harvest =	120,817.32
Discard =	4,999.12
Discard %	4.14%

<u>Product Type</u>	<u>Product Form</u>	<u>mt of Product</u>	<u>% of product</u>
Primary	Wholefish	0.00	0.00%
Primary	H & G with roe	0.00	0.00%
Primary	H & G, western cut	0.00	0.00%
Primary	H & G, eastern cut	0.00	0.00%
Primary	Roe	0.00	0.00%
Primary	Fillets, w/skin & ribs	0.00	0.00%
Primary	Fillets, w/skin, no ribs	0.00	0.00%
Primary	Fillets, w/ribs, no skin	0.00	0.00%
Primary	Fillets, no skin or ribs	696.35	2.99%
Primary	Surimi	21,764.38	93.33%
Primary	Mince	0.00	0.00%
Primary	Fish meal	857.92	3.68%
Primary	Fish oil	0.00	0.00%
Total Primary Product =		23,318.65	100.00%

PRR - Tot. Pri. Prod./Ret. Har. = 19.30 %

<u>Product Type</u>	<u>Product Form</u>	<u>mt of Product</u>
Ancillary	Wholefish	0.00
Ancillary	H & G with roe	0.00
Ancillary	H & G, western cut	0.00
Ancillary	H & G, eastern cut	0.00
Ancillary	Roe	4,169.39
Ancillary	Fillets, w/skin & ribs	0.00
Ancillary	Fillets, w/skin, no ribs	0.00
Ancillary	Fillets, w/ribs, no skin	0.00
Ancillary	Fillets, no skin or ribs	0.00
Ancillary	Surimi	0.00
Ancillary	Mince	0.00
Ancillary	Fish meal	9,411.30
Ancillary	Bone meal	1,233.68
Ancillary	Fish oil	1,448.40
Total Ancillary Product =		16,262.77

PRR of Tot. Anc. Prod./Retained Har. = 13.46%

Total Recovery (All products) = 32.76 %

Shorebased Processor's 1992 "A" Season Roe Harvest

Total Roe Production/Retained Har. =	3.71%
(As of the end of the week of March 8, 1992)	

Combined Factory Trawler and Mothership

Total for Season to Date (July 5, 1992) — Factory Trawl & Motherships

	Metric Tons
Retained Harvest =	572,447.99
Discard =	72,190.27
Discard %	12.61%

<u>Product Type</u>	<u>Product Form</u>	<u>mt of Product</u>	<u>% of product</u>
Primary	Wholefish	919.43	1.01%
Primary	H & G with roe	4.93	0.01%
Primary	H & G, western cut	376.00	0.41%
Primary	H & G, eastern cut	1,541.14	1.70%
Primary	Roe	37.97	0.04%
Primary	Fillets, w/skin & ribs	162.85	0.18%
Primary	Fillets, w/skin, no ribs	617.75	0.68%
Primary	Fillets, w/ribs, no skin	98.99	0.11%
Primary	Fillets, no skin or ribs	14,680.99	16.17%
Primary	Surimi	60,897.28	67.07%
Primary	Mince	6,274.81	6.91%
Primary	Fish meal	5,183.46	5.71%
Primary	Fish oil	0.00	0.00%
Total Primary Product =		90,795.60	100.00%

PRR - Tot. Pri. Prod./Ret. Har. = 15.86%

<u>Product Type</u>	<u>Product Form</u>	<u>mt of Product</u>
Ancillary	Wholefish	0.00
Ancillary	H & G with roe	0.00
Ancillary	H & G, western cut	0.00
Ancillary	H & G, eastern cut	0.00
Ancillary	Roe	12,927.06
Ancillary	Fillets, w/skin & ribs	0.00
Ancillary	Fillets, w/skin, no ribs	0.00
Ancillary	Fillets, w/ribs, no skin	0.00
Ancillary	Fillets, no skin or ribs	0.00
Ancillary	Surimi	84.30
Ancillary	Mince	2,276.05
Ancillary	Fish meal	15,184.95
Ancillary	Fish oil	295.00
Total Ancillary Product =		30,767.36

PRR of Tot. Anc. Prod./Retained Har. = 5.37%

Total Recovery (All Products) = 21.24%

Combined Mothership and Factory Trawler 1992 "A" Season Roe Harvest

MS & FT Total Roe/Retained Har. = 3.40%
 (As of end of the week of March 8, 1992)

Factory Trawlers

Total for Season to Date (July 5, 1992) — Factory Trawl

	Metric Tons
Retained Harvest =	456,968.22
Discard =	61,695.26
Discard %	13.50%

<u>Product Type</u>	<u>Product Form</u>	<u>mt of Product</u>	<u>% of product</u>
Primary	Wholefish	149.51	0.21%
Primary	H & G with roe	4.93	0.01%
Primary	H & G, western cut	323.91	0.45%
Primary	H & G, eastern cut	1,502.04	2.08%
Primary	Roe	35.96	0.05%
Primary	Fillets, w/skin & ribs	162.85	0.23%
Primary	Fillets, w/skin, no ribs	584.83	0.81%
Primary	Fillets, w/ribs, no skin	98.99	0.14%
Primary	Fillets, no skin or ribs	12,876.24	17.87%
Primary	Surimi	46,071.22	63.94%
Primary	Mince	6,111.58	8.48%
Primary	Fish meal	4,134.74	5.74%
Primary	Fish oil	0.00	0.00%
Total Primary Product =		72,056.80	100.00%

PRR - Tot. Pri. Prod./Ret. Har. = 15.77%

<u>Product Type</u>	<u>Product Form</u>	<u>mt of Product</u>
Ancillary	Wholefish	0.00
Ancillary	H & G with roe	0.00
Ancillary	H & G, western cut	0.00
Ancillary	H & G, eastern cut	0.00
Ancillary	Roe	11,770.33
Ancillary	Fillets, w/skin & ribs	0.00
Ancillary	Fillets, w/skin, no ribs	0.00
Ancillary	Fillets, w/ribs, no skin	0.00
Ancillary	Fillets, no skin or ribs	0.00
Ancillary	Surimi	84.30
Ancillary	Mince	814.80
Ancillary	Fish meal	9,438.87
Ancillary	Fish oil	56.25
Total Ancillary Product =		22,164.55

PRR of Tot. Anc. Prod./Retained Har. = 4.85%

Total Recovery (All Products) = 20.62%

Factory Trawlers' 1992 "A" Season Roe Harvest

Total Roe Production/Retained Har. =	3.76%
(As of the end of the week of March 8, 1992)	

Motherships

Total for Season to Date (July 5, 1992) — Motherships

	Metric Tons
Retained Harvest =	115,479.77
Discard =	10,495.01
Discard %	9.09%

<u>Product Type</u>	<u>Product Form</u>	<u>mt of Product</u>	<u>% of product</u>
Primary	Wholefish	769.92	4.11%
Primary	H & G, western cut	52.09	0.28%
Primary	H & G, eastern cut	39.10	0.21%
Primary	Roe	2.01	0.01%
Primary	Fillets, w/skin, no ribs	32.92	0.18%
Primary	Fillets, no skin or ribs	1,804.75	9.63%
Primary	Surimi	14,826.06	79.12%
Primary	Minced	163.23	0.87%
Primary	Fish Meal	1,048.72	5.60%
Primary	Fish Oil	0.00	0.00%
Total Primary Product =		18,738.80	100.00%

PRR - Tot. Pri. Prod./Ret. Har. = 16.23%

<u>Product Type</u>	<u>Product Form</u>	<u>mt of Product</u>
Ancillary	Wholefish	0.00
Ancillary	H & G, western cut	0.00
Ancillary	H & G, eastern cut	0.00
Ancillary	Roe	1,156.73
Ancillary	Fillets, w/skin or ribs	0.00
Ancillary	Fillets, no skin or ribs	0.00
Ancillary	Surimi	0.00
Ancillary	Minced	1,461.25
Ancillary	Fish Meal	5,746.08
Ancillary	Fish Oil	238.75
Total Ancilliary Product =		8,602.81

PRR of Tot. Anc. Prod./Retained Har. = 7.45%

Total Recovery (All Products) = 23.68%

Motherships' 1992 "A" Season Roe Harvest

Total Roe Production/Retained Har. = 1.77%
 (As of the end of the week of March 8, 1992)

D A	PRO WEEK	PRODMT
M A 14	26-JAN-92	126.73
M A 14	02-FEB-92	136.04
M A 14	09-FEB-92	175.01
M A 14	16-FEB-92	173.11
M A 14	23-FEB-92	87.46
M A 14	01-MAR-92	333.84
M A 14	08-MAR-92	101.13
M A 14	15-MAR-92	.87
M A 14	22-MAR-92	19.27
M A 14	29-MAR-92	1.37
M A 31	26-JAN-92	81.95
M A 31	02-FEB-92	122.37
M A 31	09-FEB-92	166.15
M A 31	16-FEB-92	125.73
M A 31	23-FEB-92	216.51
M A 31	01-MAR-92	177.38
M A 31	08-MAR-92	154.03
M A 31	22-MAR-92	1.16
M A 31	29-MAR-92	.43
M A 31	05-APR-92	1.19
M A 31	19-APR-92	1.32
M A 31	26-APR-92	4.01
M A 31	03-MAY-92	2.53
M A 31	10-MAY-92	3.53
M A 31	07-JUN-92	6.78
M A 31	14-JUN-92	31.43
M A 31	21-JUN-92	151.70
M A 31	28-JUN-92	108.86
M A 31	05-JUL-92	63.77
M A 31	12-JUL-92	90.61
M A 31	19-JUL-92	145.88
M A 31	26-JUL-92	228.94
M A 32	26-JAN-92	506.40
M A 32	02-FEB-92	546.78
M A 32	09-FEB-92	324.21
M A 32	16-FEB-92	572.15
M A 32	23-FEB-92	590.78
M A 32	01-MAR-92	742.05
M A 32	08-MAR-92	586.84
M A 32	15-MAR-92	3.56
M A 32	22-MAR-92	33.06
M A 32	29-MAR-92	23.26
M A 32	12-APR-92	.35
M A 32	19-APR-92	6.74
M A 32	26-APR-92	1.89
M A 32	03-MAY-92	4.96
M A 32	10-MAY-92	1.96
M A 32	07-JUN-92	406.90
M A 32	14-JUN-92	488.76
M A 32	21-JUN-92	466.85
M A 32	28-JUN-92	344.64
M A 32	05-JUL-92	341.88
M A 32	12-JUL-92	596.50
M A 32	19-JUL-92	755.73
M A 32	26-JUL-92	667.00
M A 32	02-AUG-92	57.65
M A 33	26-JAN-92	43.89
M A 33	02-FEB-92	25.21
M A 33	09-FEB-92	22.24
M A 33	16-FEB-92	13.77
M A 33	23-FEB-92	19.57
M A 33	01-MAR-92	16.53
M A 33	08-MAR-92	17.83
M A 33	07-JUN-92	1.51
M A 33	14-JUN-92	14.48
M A 33	21-JUN-92	23.25
M A 33	28-JUN-92	15.31
M A 33	05-JUL-92	16.70
M A 33	12-JUL-92	22.79
M A 33	19-JUL-92	27.42
M A 33	26-JUL-92	27.55
M P 01	26-JAN-92	57.89
M P 01	02-FEB-92	84.96
M P 01	09-FEB-92	287.44
M P 01	16-FEB-92	170.44
M P 01	23-FEB-92	101.94
M P 01	01-MAR-92	51.50
M P 01	08-MAR-92	89.60

M P 01	12-APR-92	5.22
M P 01	19-APR-92	20.89
M P 01	07-JUN-92	.04
M P 07	02-FEB-92	34.70
M P 07	09-FEB-92	17.39
M P 07	09-FEB-92	39.10
M P 14	02-FEB-92	1.22
M P 14	09-FEB-92	.79
M P 21	28-JUN-92	8.14
M P 21	05-JUL-92	24.78
M P 21	12-JUL-92	12.73
M P 21	19-JUL-92	23.04
M P 21	26-JUL-92	82.78
M P 23	26-JAN-92	157.84
M P 23	02-FEB-92	162.30
M P 23	09-FEB-92	190.51
M P 23	16-FEB-92	131.84
M P 23	23-FEB-92	209.52
M P 23	01-MAR-92	150.62
M P 23	08-MAR-92	129.37
M P 23	15-MAR-92	7.73
M P 23	22-MAR-92	1.52
M P 23	29-MAR-92	3.50
M P 23	05-APR-92	1.44
M P 23	12-APR-92	.92
M P 23	19-APR-92	10.10
M P 23	26-APR-92	9.61
M P 23	03-MAY-92	6.71
M P 23	10-MAY-92	7.02
M P 23	07-JUN-92	23.71
M P 23	14-JUN-92	80.36
M P 23	21-JUN-92	261.50
M P 23	28-JUN-92	117.91
M P 23	05-JUL-92	140.72
M P 23	12-JUL-92	219.18
M P 23	19-JUL-92	264.09
M P 23	26-JUL-92	250.18
M P 30	26-JAN-92	1069.10
M P 30	02-FEB-92	1324.28
M P 30	09-FEB-92	610.58
M P 30	16-FEB-92	1355.70
M P 30	23-FEB-92	1094.41
M P 30	01-MAR-92	1475.03
M P 30	08-MAR-92	1099.08
M P 30	15-MAR-92	2.10
M P 30	22-MAR-92	108.63
M P 30	29-MAR-92	111.66
M P 30	07-JUN-92	1219.00
M P 30	14-JUN-92	1217.89
M P 30	21-JUN-92	1688.39
M P 30	28-JUN-92	1444.00
M P 30	05-JUL-92	1006.27
M P 30	12-JUL-92	2160.39
M P 30	19-JUL-92	2215.91
M P 30	26-JUL-92	2422.07
M P 30	02-AUG-92	252.42
M P 31	26-JAN-92	4.65
M P 31	02-FEB-92	29.99
M P 31	09-FEB-92	18.96
M P 31	16-FEB-92	27.78
M P 31	23-FEB-92	18.08
M P 31	01-MAR-92	19.98
M P 31	08-MAR-92	5.42
M P 31	21-JUN-92	38.37
M P 31	12-JUL-92	1.19
M P 32	26-JAN-92	41.22
M P 32	02-FEB-92	91.57
M P 32	09-FEB-92	49.81
M P 32	16-FEB-92	63.25
M P 32	23-FEB-92	56.81
M P 32	01-MAR-92	49.32
M P 32	08-MAR-92	69.72
M P 32	07-JUN-92	87.60
M P 32	14-JUN-92	81.42
M P 32	21-JUN-92	201.94
M P 32	28-JUN-92	162.02
M P 32	05-JUL-92	114.44
M P 32	12-JUL-92	187.89
M P 32	19-JUL-92	141.66
M P 32	26-JUL-92	155.74

M P 32	02-AUG-92	7.16
P A 14	12-JAN-92	.02
P A 14	19-JAN-92	.46
P A 14	26-JAN-92	718.02
P A 14	02-FEB-92	1823.29
P A 14	09-FEB-92	1788.17
P A 14	16-FEB-92	1225.37
P A 14	23-FEB-92	1504.67
P A 14	01-MAR-92	2539.52
P A 14	08-MAR-92	1580.37
P A 14	15-MAR-92	323.58
P A 14	22-MAR-92	233.47
P A 14	29-MAR-92	32.54
P A 14	05-APR-92	.31
P A 14	12-APR-92	.34
P A 14	19-APR-92	.20
P A 23	26-JUL-92	36.97
P A 30	21-JUN-92	84.30
P A 30	26-JUL-92	81.49
P A 31	26-JAN-92	73.70
P A 31	02-FEB-92	86.50
P A 31	09-FEB-92	67.90
P A 31	16-FEB-92	51.10
P A 31	23-FEB-92	59.90
P A 31	01-MAR-92	65.20
P A 31	08-MAR-92	35.60
P A 31	15-MAR-92	4.39
P A 31	22-MAR-92	5.30
P A 31	29-MAR-92	13.30
P A 31	05-APR-92	1.30
P A 31	12-APR-92	.20
P A 31	19-APR-92	1.07
P A 31	26-APR-92	.87
P A 31	07-JUN-92	60.80
P A 31	14-JUN-92	148.77
P A 31	28-JUN-92	98.00
P A 31	05-JUL-92	40.90
P A 31	12-JUL-92	100.80
P A 31	19-JUL-92	96.60
P A 31	26-JUL-92	102.89
P A 32	26-JAN-92	717.31
P A 32	02-FEB-92	915.28
P A 32	09-FEB-92	624.48
P A 32	16-FEB-92	695.80
P A 32	23-FEB-92	795.53
P A 32	01-MAR-92	555.84
P A 32	08-MAR-92	562.71
P A 32	15-MAR-92	124.16
P A 32	22-MAR-92	240.38
P A 32	29-MAR-92	183.56
P A 32	05-APR-92	163.68
P A 32	12-APR-92	34.78
P A 32	07-JUN-92	740.81
P A 32	14-JUN-92	973.67
P A 32	21-JUN-92	567.67
P A 32	28-JUN-92	748.63
P A 32	05-JUL-92	794.58
P A 32	12-JUL-92	984.26
P A 32	19-JUL-92	1049.31
P A 32	26-JUL-92	974.39
P A 33	26-JAN-92	9.82
P A 33	02-FEB-92	12.69
P A 33	23-FEB-92	.75
P A 33	01-MAR-92	10.60
P A 33	08-MAR-92	6.43
P A 33	15-MAR-92	4.93
P A 33	07-JUN-92	5.32
P A 33	14-JUN-92	4.75
P A 33	21-JUN-92	.20
P A 33	05-JUL-92	.76
P A 33	12-JUL-92	8.33
P A 33	19-JUL-92	5.90
P A 33	26-JUL-92	2.84
P P 01	09-FEB-92	.85
P P 01	03-MAY-92	.05
P P 01	24-MAY-92	49.46
P P 01	07-JUN-92	9.58
P P 01	14-JUN-92	24.49
P P 01	21-JUN-92	2.89
P P 01	28-JUN-92	60.52

P P 01	05-JUL-92	1.67
P P 01	12-JUL-92	2.95
P P 01	19-JUL-92	97.34
P P 06	09-FEB-92	.46
P P 06	23-FEB-92	4.47
P P 06	15-MAR-92	.50
P P 06	26-JAN-92	.13
P P 07	02-FEB-92	1.10
P P 07	09-FEB-92	3.40
P P 07	16-FEB-92	2.86
P P 07	23-FEB-92	.25
P P 07	01-MAR-92	92.28
P P 07	08-MAR-92	110.60
P P 07	15-MAR-92	38.80
P P 07	22-MAR-92	.24
P P 07	17-MAY-92	3.33
P P 07	24-MAY-92	8.02
P P 07	31-MAY-92	11.49
P P 07	07-JUN-92	26.88
P P 07	14-JUN-92	11.82
P P 07	21-JUN-92	5.84
P P 07	28-JUN-92	.06
P P 07	05-JUL-92	6.81
P P 07	12-JUL-92	5.06
P P 07	19-JUL-92	47.23
P P 07	26-JUL-92	39.30
P P 08	05-JAN-92	.16
P P 08	12-JAN-92	.70
P P 08	19-JAN-92	5.11
P P 08	26-JAN-92	122.62
P P 08	02-FEB-92	41.09
P P 08	09-FEB-92	110.77
P P 08	16-FEB-92	169.41
P P 08	23-FEB-92	170.72
P P 08	01-MAR-92	189.19
P P 08	08-MAR-92	180.17
P P 08	15-MAR-92	18.97
P P 08	22-MAR-92	2.03
P P 08	29-MAR-92	2.84
P P 08	05-APR-92	3.57
P P 08	12-APR-92	2.30
P P 08	19-APR-92	1.88
P P 08	26-APR-92	4.55
P P 08	03-MAY-92	14.50
P P 08	10-MAY-92	4.57
P P 08	17-MAY-92	5.74
P P 08	24-MAY-92	27.08
P P 08	31-MAY-92	13.48
P P 08	07-JUN-92	89.71
P P 08	14-JUN-92	144.79
P P 08	21-JUN-92	77.33
P P 08	28-JUN-92	79.12
P P 08	05-JUL-92	19.64
P P 08	12-JUL-92	36.36
P P 08	19-JUL-92	65.52
P P 08	26-JUL-92	131.58
P P 10	15-MAR-92	.12
P P 10	22-MAR-92	.24
P P 14	23-FEB-92	35.90
P P 14	05-APR-92	.06
P P 20	26-JAN-92	2.74
P P 20	09-FEB-92	19.66
P P 20	16-FEB-92	65.76
P P 20	01-MAR-92	38.28
P P 20	08-MAR-92	39.15
P P 20	12-JUL-92	47.73
P P 20	19-JUL-92	83.95
P P 21	01-MAR-92	425.85
P P 21	08-MAR-92	158.98
P P 22	26-JAN-92	.67
P P 22	09-FEB-92	1.34
P P 22	16-FEB-92	10.12
P P 22	23-FEB-92	31.80
P P 22	01-MAR-92	30.80
P P 22	08-MAR-92	24.20
P P 22	15-MAR-92	.06
P P 23	19-JUL-92	34.23
P P 23	26-JAN-92	587.42
P P 23	02-FEB-92	938.14
P P 23	09-FEB-92	705.14

P P 23	16-FEB-92	467.26
P P 23	23-FEB-92	1184.88
P P 23	01-MAR-92	1750.39
P P 23	08-MAR-92	510.38
P P 23	15-MAR-92	43.97
P P 23	22-MAR-92	22.90
P P 23	29-MAR-92	55.00
P P 23	05-APR-92	25.40
P P 23	12-APR-92	5.38
P P 23	19-APR-92	26.05
P P 23	26-APR-92	9.29
P P 23	03-MAY-92	10.71
P P 23	10-MAY-92	3.18
P P 23	17-MAY-92	.33
P P 23	24-MAY-92	2.68
P P 23	07-JUN-92	978.10
P P 23	14-JUN-92	1342.94
P P 23	21-JUN-92	864.94
P P 23	28-JUN-92	1805.60
P P 23	05-JUL-92	1536.16
P P 23	12-JUL-92	2006.63
P P 23	19-JUL-92	1841.47
P P 23	26-JUL-92	2353.72
P P 23	02-AUG-92	47.51
P P 30	26-JAN-92	2955.22
P P 30	02-FEB-92	5503.80
P P 30	09-FEB-92	4310.11
P P 30	16-FEB-92	3102.04
P P 30	23-FEB-92	5035.62
P P 30	01-MAR-92	3925.81
P P 30	08-MAR-92	3631.10
P P 30	15-MAR-92	646.03
P P 30	22-MAR-92	840.15
P P 30	29-MAR-92	645.00
P P 30	05-APR-92	429.30
P P 30	12-APR-92	55.15
P P 30	07-JUN-92	2299.46
P P 30	14-JUN-92	3503.88
P P 30	21-JUN-92	2870.59
P P 30	28-JUN-92	3542.94
P P 30	05-JUL-92	2775.02
P P 30	12-JUL-92	3777.68
P P 30	19-JUL-92	4280.45
P P 30	26-JUL-92	5313.98
P P 30	02-AUG-92	215.67
P P 31	26-JAN-92	434.32
P P 31	02-FEB-92	775.30
P P 31	09-FEB-92	579.48
P P 31	16-FEB-92	524.26
P P 31	23-FEB-92	979.28
P P 31	01-MAR-92	911.44
P P 31	08-MAR-92	484.78
P P 31	15-MAR-92	38.49
P P 31	22-MAR-92	.45
P P 31	29-MAR-92	14.50
P P 31	05-APR-92	.22
P P 31	12-APR-92	7.93
P P 31	19-APR-92	6.83
P P 31	03-MAY-92	.74
P P 31	07-JUN-92	296.25
P P 31	14-JUN-92	245.66
P P 31	21-JUN-92	137.64
P P 31	28-JUN-92	350.54
P P 31	05-JUL-92	323.47
P P 31	12-JUL-92	442.66
P P 31	19-JUL-92	287.43
P P 31	26-JUL-92	281.27
P P 31	02-AUG-92	8.33
P P 32	26-JAN-92	374.26
P P 32	02-FEB-92	532.94
P P 32	09-FEB-92	551.88
P P 32	16-FEB-92	290.44
P P 32	23-FEB-92	341.36
P P 32	01-MAR-92	485.22
P P 32	08-MAR-92	381.21
P P 32	15-MAR-92	174.98
P P 32	22-MAR-92	60.68
P P 32	29-MAR-92	2.90
P P 32	05-APR-92	1.84
P P 32	26-APR-92	62.76

P P 32	07-JUN-92	250.72
P P 32	14-JUN-92	192.29
P P 32	21-JUN-92	188.70
P P 32	28-JUN-92	203.57
P P 32	05-JUL-92	38.99
P P 32	12-JUL-92	119.91
F	19-JUL-92	191.79
P P 32	26-JUL-92	87.05
S A 14	26-JAN-92	240.34
S A 14	02-FEB-92	383.11
S A 14	09-FEB-92	574.19
S A 14	16-FEB-92	495.37
S A 14	23-FEB-92	804.54
S A 14	01-MAR-92	951.04
S A 14	08-MAR-92	707.40
S A 14	15-MAR-92	12.02
S A 14	29-MAR-92	1.38
S A 32	26-JAN-92	711.59
S A 32	02-FEB-92	930.01
S A 32	09-FEB-92	1306.51
S A 32	16-FEB-92	1045.48
S A 32	23-FEB-92	1164.01
S A 32	01-MAR-92	1569.48
S A 32	08-MAR-92	1130.17
S A 32	15-MAR-92	54.05
S A 32	22-MAR-92	33.80
S A 32	29-MAR-92	78.66
S A 32	05-APR-92	225.39
S A 32	12-APR-92	134.18
S A 32	19-APR-92	223.52
S A 32	26-APR-92	3.45
S A 32	03-MAY-92	.76
S A 32	10-MAY-92	.66
S A 32	07-JUN-92	401.51
S A 32	14-JUN-92	396.11
S A 32	21-JUN-92	1.96
S A 32	19-JUL-92	580.65
S A 32	26-JUL-92	1260.82
S A 33	26-JAN-92	88.00
S A 33	02-FEB-92	135.31
S A 33	09-FEB-92	164.14
S A 33	16-FEB-92	139.96
S A 33	23-FEB-92	487.24
S A 33	01-MAR-92	141.81
S A 33	08-MAR-92	115.81
S A 33	15-MAR-92	5.82
S A 33	29-MAR-92	6.87
S A 33	05-APR-92	43.78
S A 33	12-APR-92	34.41
S A 33	19-APR-92	47.21
S A 33	07-JUN-92	20.43
S A 33	14-JUN-92	23.43
S A 33	19-JUL-92	119.13
S A 33	26-JUL-92	235.88
S A 39	26-JAN-92	50.15
S A 39	02-FEB-92	119.47
S A 39	09-FEB-92	137.55
S A 39	16-FEB-92	132.66
S A 39	23-FEB-92	164.25
S A 39	01-MAR-92	178.91
S A 39	08-MAR-92	160.39
S A 39	15-MAR-92	12.55
S A 39	29-MAR-92	6.08
S A 39	05-APR-92	55.66
S A 39	12-APR-92	47.63
S A 39	19-APR-92	61.91
S A 39	07-JUN-92	71.64
S A 39	14-JUN-92	34.83
S A 39	19-JUL-92	48.33
S A 39	26-JUL-92	111.38
S P 01	07-JUN-92	3.18
S P 23	26-JAN-92	7.68
S P 23	09-FEB-92	100.81
S P 23	16-FEB-92	81.83
S P 23	23-FEB-92	109.82
S P 23	01-MAR-92	152.49
S P 23	08-MAR-92	141.70
S P 23	07-JUN-92	2.21
S P 23	19-JUL-92	2.68
S P 23	26-JUL-92	4.05

S P 30	26-JAN-92	1369.30
S P 30	02-FEB-92	2052.02
S P 30	09-FEB-92	3027.95
S P 30	16-FEB-92	2458.29
S P 30	23-FEB-92	3378.38
S P 30	01-MAR-92	3044.63
S P 30	08-MAR-92	2534.85
S P 30	15-MAR-92	152.61
S P 30	22-MAR-92	86.60
S P 30	29-MAR-92	154.18
S P 30	05-APR-92	540.97
S P 30	12-APR-92	344.90
S P 30	19-APR-92	606.78
S P 30	26-APR-92	7.37
S P 30	03-MAY-92	2.16
S P 30	10-MAY-92	1.52
S P 30	07-JUN-92	990.49
S P 30	14-JUN-92	995.44
S P 30	21-JUN-92	15.96
S P 30	19-JUL-92	1469.51
S P 30	26-JUL-92	3176.57
S P 32	26-JAN-92	155.17
S P 32	02-FEB-92	128.95
S P 32	09-FEB-92	16.73
S P 32	16-FEB-92	45.35
S P 32	23-FEB-92	343.08
S P 32	01-MAR-92	38.92
S P 32	08-MAR-92	16.33
S P 32	15-MAR-92	.14
S P 32	22-MAR-92	5.26
S P 32	29-MAR-92	5.00
S P 32	05-APR-92	7.70
S P 32	12-APR-92	1.12
S P 32	19-APR-92	3.39
S P 32	03-MAY-92	.03
S P 32	24-MAY-92	5.80
S P 32	07-JUN-92	67.62
S P 32	14-JUN-92	16.05
S P 32	21-JUN-92	1.28
S P 32	19-JUL-92	181.27
S P 32	26-JUL-92	189.76
S P 39	09-FEB-92	10.71

1992 pollock catch in the bsai by mothership,
catcher processor, and shoreside facility.

DESIG	RETAINED	DISCARD	TOTAL
M 26-Jan	8354.47	423.72	8778.19
M 02-Feb	10531.8	1262.25	11794.05
M 09-Feb	5448.12	1065.48	6513.6
M 16-Feb	10099.3	768.74	10868.04
M 23-Feb	9740.87	349.59	10090.46
M 01-Mar	11017.74	469.88	11487.62
M 08-Mar	8944.56	200.42	9144.98
M 15-Mar	35.14	190.21	225.35
M 22-Mar	6.91	115	121.91
M 29-Mar	15.91	109.6	125.51
M 05-Apr	6.55	8.62	15.17
M 12-Apr	9.4	193.06	202.46
M 19-Apr	66.8	180.76	247.56
M 26-Apr	43.68	408.05	451.73
M 03-May	30.5	405.2	435.7
M 10-May	31.92	230.91	262.83
M 17-May	0	1.69	1.69
M 24-May	0	2.7	2.7
M 07-Jun	9766.66	1082.61	10849.27
M 14-Jun	8041.07	584.6	8625.67
M 21-Jun	13368.5	1731.23	15099.73
M 28-Jun	11525.01	362.45	11887.46
M 05-Jul	8394.86	348.24	8743.1
TOTALS	115479.7	10495.01	125974.7

P 05-Jan	0.29	34.44	34.73
P 12-Jan	1.25	19.18	20.43
P 19-Jan	9.13	62.82	71.95
P 26-Jan	30620.51	5867.47	36487.98
P 02-Feb	55884.4	5558.39	61442.79
P 09-Feb	41651.44	4343.71	45995.15
P 16-Feb	34127.53	6367.48	40495.01
P 23-Feb	52295.16	6471.44	58766.6
P 01-Mar	52268.79	5242.72	57511.51
P 08-Mar	31830.86	2905.61	34736.47
P 15-Mar	98.94	774.06	873
P 22-Mar	207.68	888.69	1096.37
P 29-Mar	191.26	675.4	866.66
P 05-Apr	123.16	459.58	582.74
P 12-Apr	50.74	792.33	843.07
P 19-Apr	140.65	910.23	1050.88
P 26-Apr	451.43	547.18	998.61
P 03-May	76.77	678.87	755.64
P 10-May	22.62	205.98	228.6
P 17-May	16.87	233.3	250.17
P 24-May	122.32	471.35	593.67
P 31-May	41.75	212.45	254.2
P 07-Jun	27807.58	4882.72	32690.3
P 14-Jun	35909.9	2941.79	38851.69
P 21-Jun	23899.18	3187.83	27087.01
P 28-Jun	41294.67	5591.28	46885.95
P 05-Jul	27512.56	1732.01	29244.57
	456657.4	62058.31	518715.7

S 26-Jan	11545.58	1307.43	12853.01
S 02-Feb	12285.88	260.63	12546.51
S 09-Feb	17385.13	511.87	17897
S 16-Feb	13289.58	220.6	13510.18
S 23-Feb	18626.69	192.99	18819.68
S 01-Mar	20089.6	23.6	20113.2
S 08-Mar	18658.96	70.77	18729.73
S 15-Mar	814.39	173.81	988.2
S 22-Mar	0	63.43	63.43

S	29-Mar	58.78	217.43	276.21
S	05-Apr	0	55.11	55.11
S	12-Apr	0.76	119.51	120.27
S	19-Apr	22.59	568.13	590.72
S	26-Apr	50.45	703.24	753.69
S	03-May	12.86	247.07	259.93
S	10-May	8.6	218.71	227.31
S	24-May	78.1	0.3	78.4
S	07-Jun	7311.07	44.48	7355.55
S	14-Jun	471.7	0	471.7
S	21-Jun	106.6	0.01	106.61
S	28-Jun	0	0	0
		120817.3	4999.12	125816.4

Week Ending January 24, 1992 — Miscellaneous				Week Ending February 2, 1992 — Miscellaneous				Week Ending February 9, 1992 — Miscellaneous				Week Ending February 16, 1992 — Miscellaneous			
Metric Tons				Metric Tons				Metric Tons				Metric Tons			
4	Remained Harvest =	2,544.7		5	Remained Harvest =	10,531.90		6	Remained Harvest =	5,463.15		7	Remained Harvest =	18,899.30	
6	Discard =	433.73		7	Discard =	1,362.33		8	Discard =	1,863.48		9	Discard =	788.74	
7	Discard %	1.7%		8	Discard %	12.9%		9	Discard %	34.1%		10	Discard %	4.2%	
10	Product Type	Product Form	mt of Product	11	Product Type	Product Form	mt of Product	12	Product Type	Product Form	mt of Product	13	Product Type	Product Form	mt of Product
11	Primary	Wholesale	97.19	12	Primary	Wholesale	14.94	13	Primary	Wholesale	177.44	14	Primary	Wholesale	178.44
12	Primary	H & O, western cut	0.00	13	Primary	H & O, western cut	347.9	14	Primary	H & O, western cut	17.39	15	Primary	H & O, western cut	0.80
13	Primary	H & O, western cut	0.00	14	Primary	H & O, western cut	0.00	15	Primary	H & O, western cut	96.10	16	Primary	H & O, western cut	0.80
14	Primary	Run	0.00	15	Primary	Run	1.22	16	Primary	Run	0.79	17	Primary	Run	0.80
15	Primary	Fibre, white, no rim	0.00	16	Primary	Fibre, white, no rim	0.00	17	Primary	Fibre, white, no rim	0.80	18	Primary	Fibre, white, no rim	0.80
16	Primary	Fibre, no side or rim	137.84	17	Primary	Fibre, no side or rim	162.36	18	Primary	Fibre, no side or rim	190.51	19	Primary	Fibre, no side or rim	131.84
17	Primary	Staple	1,089.10	18	Primary	Staple	1,564.23	19	Primary	Staple	68.54	20	Primary	Staple	1,258.98
18	Primary	Miscel	0.00	19	Primary	Miscel	29.89	20	Primary	Miscel	13.94	21	Primary	Miscel	27.78
19	Primary	Flax Meal	43.23	20	Primary	Flax Meal	91.37	21	Primary	Flax Meal	48.21	22	Primary	Flax Meal	63.33
20	Primary	Flax Oil	0.00	21	Primary	Flax Oil	0.00	22	Primary	Flax Oil	0.00	23	Primary	Flax Oil	0.00
21	Total Primary Product =	1,306.70		22	Total Primary Product =	1,727.62		23	Total Primary Product =	1,314.58		24	Total Primary Product =	1,348.41	
22	PR of Tot. Prd. Prod./Remained Har. =	51.9%		23	PR of Tot. Prd. Prod./Remained Har. =	16.4%		24	PR of Tot. Prd. Prod./Remained Har. =	24.0%		25	PR of Tot. Prd. Prod./Remained Har. =	17.2%	
25	Product Type	Product Form	mt of Product	26	Product Type	Product Form	mt of Product	27	Product Type	Product Form	mt of Product	28	Product Type	Product Form	mt of Product
26	Auxiliary	Wholesale	0.00	27	Auxiliary	Wholesale	0.00	28	Auxiliary	Wholesale	0.00	29	Auxiliary	Wholesale	0.80
27	Auxiliary	H & O, western cut	0.00	28	Auxiliary	H & O, western cut	0.00	29	Auxiliary	H & O, western cut	0.80	30	Auxiliary	H & O, western cut	0.80
28	Auxiliary	H & O, western cut	0.00	29	Auxiliary	H & O, western cut	0.00	30	Auxiliary	H & O, western cut	0.00	31	Auxiliary	H & O, western cut	0.80
29	Auxiliary	Run	124.73	30	Auxiliary	Run	146.84	31	Auxiliary	Run	173.81	32	Auxiliary	Run	173.81
30	Auxiliary	Fibre, white, no rim	0.80	31	Auxiliary	Fibre, white, no rim	0.80	32	Auxiliary	Fibre, white, no rim	0.80	33	Auxiliary	Fibre, white, no rim	0.80
31	Auxiliary	Fibre, no side or rim	0.00	32	Auxiliary	Fibre, no side or rim	0.00	33	Auxiliary	Fibre, no side or rim	0.00	34	Auxiliary	Fibre, no side or rim	0.00
32	Auxiliary	Staple	0.00	33	Auxiliary	Staple	0.00	34	Auxiliary	Staple	0.00	35	Auxiliary	Staple	0.00
33	Auxiliary	Miscel	81.85	34	Auxiliary	Miscel	122.57	35	Auxiliary	Miscel	164.13	36	Auxiliary	Miscel	164.13
34	Auxiliary	Flax Meal	304.40	35	Auxiliary	Flax Meal	346.71	36	Auxiliary	Flax Meal	324.21	37	Auxiliary	Flax Meal	324.21
35	Auxiliary	Flax Oil	43.83	36	Auxiliary	Flax Oil	53.21	37	Auxiliary	Flax Oil	23.24	38	Auxiliary	Flax Oil	23.24
36	Total Auxiliary Product =	734.87		37	Total Auxiliary Product =	830.40		38	Total Auxiliary Product =	877.81		39	Total Auxiliary Product =	877.81	
37	PR of Tot. Aux. Prod./Remained Har. =	5.6%		38	PR of Tot. Aux. Prod./Remained Har. =	7.1%		39	PR of Tot. Aux. Prod./Remained Har. =	12.6%		40	PR of Tot. Aux. Prod./Remained Har. =	6.5%	
38	Total Res Production/Remained Har. =	1.3%		39	Total Res Production/Remained Har. =	1.3%		40	Total Res Production/Remained Har. =	1.3%		41	Total Res Production/Remained Har. =	1.7%	
41	Week Ending January 5, 1992 — Pottery Trawler			42	Week Ending January 12, 1992 — Pottery Trawler			43	Week Ending January 19, 1992 — Pottery Trawler			44	Week Ending January 26, 1992 — Pottery Trawler		
42	Metric Tons			43	Metric Tons			44	Metric Tons			45	Metric Tons		
45	Remained Harvest =	0.29		46	Remained Harvest =	1.13		47	Remained Harvest =	0.13		48	Remained Harvest =	30,826.51	
46	Discard =	34.44		47	Discard =	18.5		48	Discard =	42.82		49	Discard =	1,877.27	
47	Discard %	11,975.8%		48	Discard %	1,544.0%		49	Discard %	481.8%		50	Discard %	13.1%	
51	Product Type	Product Form	mt of Product	52	Product Type	Product Form	mt of Product	53	Product Type	Product Form	mt of Product	54	Product Type	Product Form	mt of Product
52	Primary	Wholesale	0.00	53	Primary	Wholesale	0.80	54	Primary	Wholesale	0.80	55	Primary	Wholesale	0.80
53	Primary	H & O with rim	0.00	54	Primary	H & O with rim	0.00	55	Primary	H & O with rim	0.00	56	Primary	H & O with rim	0.00
54	Primary	H & O, western cut	0.00	55	Primary	H & O, western cut	0.00	56	Primary	H & O, western cut	0.00	57	Primary	H & O, western cut	0.13
55	Primary	H & O, western cut	0.14	56	Primary	H & O, western cut	0.70	57	Primary	H & O, western cut	1.11	58	Primary	H & O, western cut	12.82
56	Primary	Run	0.00	57	Primary	Run	0.00	58	Primary	Run	0.00	59	Primary	Run	0.00
57	Primary	Fibre, white, no rim	0.00	58	Primary	Fibre, white, no rim	0.00	59	Primary	Fibre, white, no rim	0.00	60	Primary	Fibre, white, no rim	0.00
58	Primary	Fibre, white, no rim	0.00	59	Primary	Fibre, white, no rim	0.00	60	Primary	Fibre, white, no rim	0.00	61	Primary	Fibre, white, no rim	0.00
59	Primary	Fibre, white, no rim	0.00	60	Primary	Fibre, white, no rim	0.00	61	Primary	Fibre, white, no rim	0.00	62	Primary	Fibre, white, no rim	0.00
60	Primary	Fibre, no side or rim	0.00	61	Primary	Fibre, no side or rim	0.00	62	Primary	Fibre, no side or rim	0.00	63	Primary	Fibre, no side or rim	0.00
61	Primary	Staple	0.00	62	Primary	Staple	0.00	63	Primary	Staple	0.00	64	Primary	Staple	0.00
62	Primary	Miscel	0.00	63	Primary	Miscel	0.00	64	Primary	Miscel	0.00	65	Primary	Miscel	0.00
63	Primary	Flax Meal	0.00	64	Primary	Flax Meal	0.00	65	Primary	Flax Meal	0.00	66	Primary	Flax Meal	0.00
64	Primary	Flax Oil	0.00	65	Primary	Flax Oil	0.00	66	Primary	Flax Oil	0.00	67	Primary	Flax Oil	0.00
65	Total Primary Product =	0.14		66	Total Primary Product =	0.70		67	Total Primary Product =	1.11		68	Total Primary Product =	4,074.84	
66	PR of Tot. Prd. Prod./Remained Har. =	53.7%		67	PR of Tot. Prd. Prod./Remained Har. =	62.8%		68	PR of Tot. Prd. Prod./Remained Har. =	85.9%		69	PR of Tot. Prd. Prod./Remained Har. =	14.6%	
69	Product Type	Product Form	mt of Product	70	Product Type	Product Form	mt of Product	71	Product Type	Product Form	mt of Product	72	Product Type	Product Form	mt of Product
70	Auxiliary	Wholesale	0.00	71	Auxiliary	Wholesale	0.00	72	Auxiliary	Wholesale	0.00	73	Auxiliary	Wholesale	0.00
71	Auxiliary	H & O with rim	0.00	72	Auxiliary	H & O with rim	0.00	73	Auxiliary	H & O with rim	0.00	74	Auxiliary	H & O with rim	0.00
72	Auxiliary	H & O, western cut	0.00	73	Auxiliary	H & O, western cut	0.00	74	Auxiliary	H & O, western cut	0.00	75	Auxiliary	H & O, western cut	0.00
73	Auxiliary	H & O, western cut	0.00	74	Auxiliary	H & O, western cut	0.00	75	Auxiliary	H & O, western cut	0.00	76	Auxiliary	H & O, western cut	0.00
74	Auxiliary	Run	0.00	75	Auxiliary	Run	0.02	76	Auxiliary	Run	0.48	77	Auxiliary	Run	71.82
75	Auxiliary	Fibre, white, no rim	0.00	76	Auxiliary	Fibre, white, no rim	0.00	77	Auxiliary	Fibre, white, no rim	0.00	78	Auxiliary	Fibre, white, no rim	0.00
76	Auxiliary	Fibre, white, no rim	0.00	77	Auxiliary	Fibre, white, no rim	0.00	78	Auxiliary	Fibre, white, no rim	0.00	79	Auxiliary	Fibre, white, no rim	0.00
77	Auxiliary	Fibre, white, no rim	0.00	78	Auxiliary	Fibre, white, no rim	0.00	79	Auxiliary	Fibre, white, no rim	0.00	80	Auxiliary	Fibre, white, no rim	0.00
78	Auxiliary	Fibre, no side or rim	0.00	79	Auxiliary	Fibre, no side or rim	0.00	80	Auxiliary	Fibre, no side or rim	0.00	81	Auxiliary	Fibre, no side or rim	0.00
79	Auxiliary	Staple	0.00	80	Auxiliary	Staple	0.00	81	Auxiliary	Staple	0.00	82	Auxiliary	Staple	0.00
80	Auxiliary	Miscel	0.00	81	Auxiliary	Miscel	0.00	82	Auxiliary	Miscel	0.00	83	Auxiliary	Miscel	0.00
81	Auxiliary	Flax Meal	0.00	82	Auxiliary	Flax Meal	0.00	83	Auxiliary	Flax Meal	0.00	84	Auxiliary	Flax Meal	0.00
82	Auxiliary	Flax Oil	0.00	83	Auxiliary	Flax Oil	0.00	84	Auxiliary	Flax Oil	0.00	85	Auxiliary	Flax Oil	0.00
83	Total Auxiliary Product =	0.00		84	Total Auxiliary Product =	0.02		85	Total Auxiliary Product =	0.48		86	Total Auxiliary Product =	1,314.83	
84	PR of Tot. Aux. Prod./Remained Har. =	0.0%		85	PR of Tot. Aux. Prod./Remained Har. =	1.0%		86	PR of Tot. Aux. Prod./Remained Har. =	5.8%		87	PR of Tot. Aux. Prod./Remained Har. =	4.9%	
85	Total Res Production/Remained Har. =	0.0%		86	Total Res Production/Remained Har. =	1.0%		87	Total Res Production/Remained Har. =	1.0%		88	Total Res Production/Remained Har. =	2.3%	
88	Week Ending January 24, 1992 — Shrimps			89	Week Ending February 2, 1992 — Shrimps			90	Week Ending February 9, 1992 — Shrimps			91	Week Ending February 16, 1992 — Shrimps		
92	Metric Tons			93	Metric Tons			94	Metric Tons			95	Metric Tons		
95	Remained Harvest =	11,545.53		96	Remained Harvest =	12,315.81		97	Remained Harvest =	17,365.13		98	Remained Harvest =	13,283.31	
96	Discard =	3,074.43		97	Discard =	3,068.83		98	Discard =	5,117		99	Discard =	2,250.80	
97	Discard %	11.32%		98	Discard %	2.1%		99	Discard %	2.9%		100	Discard %	1.6%	
103	Product Type	Product Form	mt of Product	104	Product Type	Product Form	mt of Product	105	Product Type	Product Form	mt of Product	106	Product Type	Product Form	mt of Product
104	Primary	Wholesale	0.00	105	Primary	Wholesale	0.00	106	Primary	Wholesale	0.00	107	Primary	Wholesale	0.00
105	Primary	H & O with rim	0.00	106	Primary	H & O with rim	0.00	107	Primary	H & O with rim	0.00	108	Primary	H & O with rim	0.00
106	Primary	H & O, western cut	0.00	107	Primary	H & O, western cut	0.00	108	Primary	H & O, western cut	0.00	109	Primary	H & O, western cut	0.00
107	Primary	H & O, western cut	0.00	108	Primary	H & O, western cut	0.00	109	Primary	H & O, western cut	0.00	110	Primary	H & O, western cut	0.00
108	Primary	Run	0.00	109	Primary	Run	0.00	110	Primary	Run	0.00	111	Primary	Run	0.00
109	Primary	Fibre, white, no rim	0.00	110	Primary	Fibre, white, no rim	0.00	111	Primary	Fibre, white, no rim	0.00	112	Primary	Fibre, white, no rim	0.00
110	Primary	Fibre, white, no rim	0.00	111	Primary	Fibre, white, no rim	0.00	112	Primary	Fibre, white, no rim	0.00	113	Primary	Fibre, white, no rim	0.00
111	Primary	Fibre, white, no rim	0.00	112	Primary	Fibre, white, no rim	0.00	113	Primary	Fibre, white, no rim	0.00	114	Primary	Fibre, white, no rim	0.00
112	Primary	Fibre, no side or rim	7.43	113	Primary	Fibre, no side or rim	100.81	114	Primary	Fibre, no side or rim	100.81	115	Primary	Fibre, no side or rim	81.23
113	Primary	Staple	1,349.30	114	Primary	Staple	1,023.02	115	Primary	Staple	1,023.02	116	Primary	Staple	2,042.29
114	Primary	Miscel	0.00	115	Primary	Miscel	0.00	116	Primary	Miscel	0.00	117	Primary	Miscel	0.00
115	Primary	Flax Meal	153.17	116	Primary	Flax Meal	123.93	117	Primary	Flax Meal	16.73	118	Primary	Flax Meal	43.53
116	Primary	Flax Oil	0.00	117	Primary	Flax Oil	0.00	118	Primary	Flax Oil	0.00	119	Primary	Flax Oil	0.00
117	Total Primary Product =	1,532.15		118	Total Primary Product =	2,211.79		119	Total Primary Product =	3,145.49		120	Total Primary		

	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG
4	Week Ending February 21, 1992 — Meritopia				Week Ending March 1, 1992 — Meritopia				Week Ending March 8, 1992 — Meritopia				Total for All of Row Dates (0-1 thru 3-6) — Meritopia			
5	Metric Tons				Metric Tons				Metric Tons				Metric Tons			
6	Retained Harvest =	9,740.07			Retained Harvest =	11,017.24			Retained Harvest =	9,644.56			Retained Harvest =	64,134.64		
7	Discard =	349.39			Discard =	499.83			Discard =	298.43			Discard =	4,540.80		
8	Discard %	3.59%			Discard %	4.52%			Discard %	3.08%			Discard %	7.08%		
9																
10	Product Type	Product Form	mt of Product		Product Type	Product Form	mt of Product		Product Type	Product Form	mt of Product		Product Type	Product Form	mt of Product	
11	Primary	Wholefish	101.94		Primary	Wholefish	51.50		Primary	Wholefish	92.00		Primary	Wholefish	743.77	
12	Primary	M & O, western cut	0.00		Primary	M & O, western cut	0.00		Primary	M & O, western cut	0.00		Primary	M & O, western cut	52.89	
13	Primary	M & O, eastern cut	0.00		Primary	M & O, eastern cut	0.00		Primary	M & O, eastern cut	0.00		Primary	M & O, eastern cut	30.19	
14	Primary	Run	0.00		Primary	Run	0.00		Primary	Run	0.00		Primary	Run	2.81	
15	Primary	Fillets, white & skin	0.00		Primary	Fillets, white & skin	0.00		Primary	Fillets, white & skin	0.00		Primary	Fillets, white & skin	0.00	
16	Primary	Fillets, no skin or skin	209.31		Primary	Fillets, no skin or skin	150.62		Primary	Fillets, no skin or skin	129.37		Primary	Fillets, no skin or skin	1,122.80	
17	Primary	Steaks	1,054.41		Primary	Steaks	1,073.83		Primary	Steaks	1,094.88		Primary	Steaks	8,024.13	
18	Primary	Meats	18.84		Primary	Meats	15.84		Primary	Meats	5.42		Primary	Meats	124.66	
19	Primary	Flat Meat	36.81		Primary	Flat Meat	49.32		Primary	Flat Meat	49.32		Primary	Flat Meat	482.39	
20	Primary	Flat Oil	0.00		Primary	Flat Oil	0.00		Primary	Flat Oil	0.00		Primary	Flat Oil	0.00	
21	Total Primary Product =	1,460.76			Total Primary Product =	1,766.43			Total Primary Product =	1,772.79			Total Primary Product =	10,533.31		
22	PER of Tot. Pri. Prod./Retained Har. =	15.06%			PER of Tot. Pri. Prod./Retained Har. =	15.95%			PER of Tot. Pri. Prod./Retained Har. =	18.35%			PER of Tot. Pri. Prod./Retained Har. =	16.43%		
23																
24	Product Type	Product Form	mt of Product		Product Type	Product Form	mt of Product		Product Type	Product Form	mt of Product		Product Type	Product Form	mt of Product	
25	Auxiliary	Wholefish	0.00		Auxiliary	Wholefish	0.00		Auxiliary	Wholefish	0.00		Auxiliary	Wholefish	0.00	
26	Auxiliary	M & O, western cut	0.00		Auxiliary	M & O, western cut	0.00		Auxiliary	M & O, western cut	0.00		Auxiliary	M & O, western cut	0.00	
27	Auxiliary	M & O, eastern cut	0.00		Auxiliary	M & O, eastern cut	0.00		Auxiliary	M & O, eastern cut	0.00		Auxiliary	M & O, eastern cut	0.00	
28	Auxiliary	Run	0.00		Auxiliary	Run	0.00		Auxiliary	Run	0.00		Auxiliary	Run	0.00	
29	Auxiliary	Fillets, white & skin	0.00		Auxiliary	Fillets, white & skin	0.00		Auxiliary	Fillets, white & skin	0.00		Auxiliary	Fillets, white & skin	0.00	
30	Auxiliary	Fillets, no skin or skin	0.00		Auxiliary	Fillets, no skin or skin	0.00		Auxiliary	Fillets, no skin or skin	0.00		Auxiliary	Fillets, no skin or skin	0.00	
31	Auxiliary	Steaks	0.00		Auxiliary	Steaks	0.00		Auxiliary	Steaks	0.00		Auxiliary	Steaks	0.00	
32	Auxiliary	Meats	0.00		Auxiliary	Meats	0.00		Auxiliary	Meats	0.00		Auxiliary	Meats	0.00	
33	Auxiliary	Flat Meat	216.51		Auxiliary	Flat Meat	177.38		Auxiliary	Flat Meat	154.82		Auxiliary	Flat Meat	1,064.54	
34	Auxiliary	Flat Oil	300.79		Auxiliary	Flat Oil	342.85		Auxiliary	Flat Oil	364.84		Auxiliary	Flat Oil	2,621.27	
35	Auxiliary	Flat Oil	19.36		Auxiliary	Flat Oil	14.53		Auxiliary	Flat Oil	17.81		Auxiliary	Flat Oil	147.50	
36	Total Auxiliary Product =	914.31			Total Auxiliary Product =	1,209.80			Total Auxiliary Product =	839.83			Total Auxiliary Product =	4,028.53		
37	PER of Tot. Aux. Prod./Retained Har. =	9.59%			PER of Tot. Aux. Prod./Retained Har. =	11.59%			PER of Tot. Aux. Prod./Retained Har. =	8.61%			PER of Tot. Aux. Prod./Retained Har. =	9.37%		
38																
39	Total Run Production/Retained Har. =	0.00%			Total Run Production/Retained Har. =	0.20%			Total Run Production/Retained Har. =	1.33%			Total Run Production/Retained Har. =	1.77%		
40																
41																
42																
43																
44																
45	Week Ending February 2, 1992 — Fantasy Trawler				Week Ending February 9, 1992 — Fantasy Trawler				Week Ending February 16, 1992 — Fantasy Trawler				Week Ending February 23, 1992 — Fantasy Trawler			
46	Metric Tons				Metric Tons				Metric Tons				Metric Tons			
47	Retained Harvest =	35,544.40			Retained Harvest =	41,631.44			Retained Harvest =	34,127.53			Retained Harvest =	32,293.18		
48	Discard =	1,538.39			Discard =	4,343.71			Discard =	6,367.44			Discard =	6,071.44		
49	Discard %	4.33%			Discard %	10.43%			Discard %	18.64%			Discard %	18.81%		
50																
51	Product Type	Product Form	mt of Product		Product Type	Product Form	mt of Product		Product Type	Product Form	mt of Product		Product Type	Product Form	mt of Product	
52	Primary	Wholefish	0.00		Primary	Wholefish	0.00		Primary	Wholefish	0.00		Primary	Wholefish	0.00	
53	Primary	M & O with eye	0.00		Primary	M & O with eye	0.00		Primary	M & O with eye	0.00		Primary	M & O with eye	44.7	
54	Primary	M & O, western cut	1.10		Primary	M & O, western cut	3.60		Primary	M & O, western cut	2.8		Primary	M & O, western cut	0.25	
55	Primary	M & O, eastern cut	41.09		Primary	M & O, eastern cut	118.77		Primary	M & O, eastern cut	109.41		Primary	M & O, eastern cut	178.22	
56	Primary	Run	0.00		Primary	Run	0.00		Primary	Run	0.00		Primary	Run	51.80	
57	Primary	Fillets, white & skin	0.00		Primary	Fillets, white & skin	15.88		Primary	Fillets, white & skin	63.78		Primary	Fillets, white & skin	0.00	
58	Primary	Fillets, no skin or skin	0.00		Primary	Fillets, no skin or skin	0.00		Primary	Fillets, no skin or skin	0.00		Primary	Fillets, no skin or skin	0.00	
59	Primary	Fillets, white & skin	0.00		Primary	Fillets, white & skin	1.34		Primary	Fillets, white & skin	10.12		Primary	Fillets, white & skin	31.80	
60	Primary	Fillets, no skin or skin	938.14		Primary	Fillets, no skin or skin	703.44		Primary	Fillets, no skin or skin	407.26		Primary	Fillets, no skin or skin	1,584.82	
61	Primary	Steaks	3,033.00		Primary	Steaks	4,311.81		Primary	Steaks	3,102.84		Primary	Steaks	5,033.42	
62	Primary	Meats	751.34		Primary	Meats	378.43		Primary	Meats	378.43		Primary	Meats	378.23	
63	Primary	Flat Meat	323.84		Primary	Flat Meat	515.21		Primary	Flat Meat	290.44		Primary	Flat Meat	341.56	
64	Primary	Flat Oil	0.00		Primary	Flat Oil	0.00		Primary	Flat Oil	0.00		Primary	Flat Oil	0.00	
65	Total Primary Product =	7,792.37			Total Primary Product =	6,233.09			Total Primary Product =	4,632.13			Total Primary Product =	7,748.23		
66	PER of Tot. Pri. Prod./Retained Har. =	21.91%			PER of Tot. Pri. Prod./Retained Har. =	14.98%			PER of Tot. Pri. Prod./Retained Har. =	13.57%			PER of Tot. Pri. Prod./Retained Har. =	24.00%		
67																
68	Product Type	Product Form	mt of Product		Product Type	Product Form	mt of Product		Product Type	Product Form	mt of Product		Product Type	Product Form	mt of Product	
69	Auxiliary	Wholefish	0.00		Auxiliary	Wholefish	0.00		Auxiliary	Wholefish	0.00		Auxiliary	Wholefish	0.00	
70	Auxiliary	M & O with eye	0.00		Auxiliary	M & O with eye	0.00		Auxiliary	M & O with eye	0.00		Auxiliary	M & O with eye	0.00	
71	Auxiliary	M & O, western cut	0.00		Auxiliary	M & O, western cut	0.00		Auxiliary	M & O, western cut	0.00		Auxiliary	M & O, western cut	0.00	
72	Auxiliary	M & O, eastern cut	0.00		Auxiliary	M & O, eastern cut	0.00		Auxiliary	M & O, eastern cut	0.00		Auxiliary	M & O, eastern cut	0.00	
73	Auxiliary	Run	1,212.19		Auxiliary	Run	1,712.17		Auxiliary	Run	1,223.37		Auxiliary	Run	1,204.87	
74	Auxiliary	Fillets, white & skin	0.00		Auxiliary	Fillets, white & skin	0.00		Auxiliary	Fillets, white & skin	0.00		Auxiliary	Fillets, white & skin	0.00	
75	Auxiliary	Fillets, no skin or skin	0.00		Auxiliary	Fillets, no skin or skin	0.00		Auxiliary	Fillets, no skin or skin	0.00		Auxiliary	Fillets, no skin or skin	0.00	
76	Auxiliary	Fillets, white & skin	0.00		Auxiliary	Fillets, white & skin	0.00		Auxiliary	Fillets, white & skin	0.00		Auxiliary	Fillets, white & skin	0.00	
77	Auxiliary	Fillets, no skin or skin	0.00		Auxiliary	Fillets, no skin or skin	0.00		Auxiliary	Fillets, no skin or skin	0.00		Auxiliary	Fillets, no skin or skin	0.00	
78	Auxiliary	Steaks	0.00		Auxiliary	Steaks	0.00		Auxiliary	Steaks	0.00		Auxiliary	Steaks	0.00	
79	Auxiliary	Meats	0.00		Auxiliary	Meats	0.00		Auxiliary	Meats	0.00		Auxiliary	Meats	0.00	
80	Auxiliary	Flat Meat	915.21		Auxiliary	Flat Meat	634.48		Auxiliary	Flat Meat	634.48		Auxiliary	Flat Meat	793.53	
81	Auxiliary	Flat Oil	12.69		Auxiliary	Flat Oil	0.00		Auxiliary	Flat Oil	0.00		Auxiliary	Flat Oil	0.75	
82	Total Auxiliary Product =	2,377.78			Total Auxiliary Product =	2,405.53			Total Auxiliary Product =	1,972.27			Total Auxiliary Product =	2,300.93		
83	PER of Tot. Aux. Prod./Retained Har. =	3.06%			PER of Tot. Aux. Prod./Retained Har. =	3.89%			PER of Tot. Aux. Prod./Retained Har. =	4.26%			PER of Tot. Aux. Prod./Retained Har. =	2.95%		
84																
85	Total Run Production/Retained Har. =	0.00%			Total Run Production/Retained Har. =	0.00%			Total Run Production/Retained Har. =	0.00%			Total Run Production/Retained Har. =	0.00%		
86																
87																
88																
89																
90																
91																
92																
93	Week Ending February 23, 1992 — Shearwater				Week Ending March 1, 1992 — Shearwater				Week Ending March 8, 1992 — Shearwater				Total for All of Row Dates (0-1 thru 3-6) — Shearwater			
94	Metric Tons				Metric Tons											

CD	CE	CF	CG	CH	CI	CL	CM	CN	CO	CP	CQ	CR	CS			
West Bldg June 14, 1992 — Mainbridge				West Bldg June 21, 1992 — Mainbridge				West Bldg June 28, 1992 — Mainbridge				West Bldg July 5, 1992 — Mainbridge				
Metric Tons				Metric Tons				Metric Tons				Metric Tons				
6	Retained Harvest =	3,621.87		Retained Harvest =	13,360.30		Retained Harvest =	11,223.02		Retained Harvest =	8,964.36					
7	Dumped =	364.00		Dumped =	1,791.23		Dumped =	962.43		Dumped =	348.24					
8	Dumped %	7.9%		Dumped %	12.9%		Dumped %	3.4%		Dumped %	4.1%					
10	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	
11	Primary	Wholesale	0.00	Primary	Wholesale	0.00	Primary	Wholesale	0.00	Primary	Wholesale	0.00	Primary	Wholesale	0.00	
12	Primary	H & O, western cut	0.00	Primary	H & O, western cut	0.00	Primary	H & O, western cut	0.00	Primary	H & O, western cut	0.00	Primary	H & O, western cut	0.00	
13	Primary	H & O, eastern cut	0.00	Primary	H & O, eastern cut	0.00	Primary	H & O, eastern cut	0.00	Primary	H & O, eastern cut	0.00	Primary	H & O, eastern cut	0.00	
14	Primary	Run	0.00	Primary	Run	0.00	Primary	Run	0.00	Primary	Run	0.00	Primary	Run	0.00	
15	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	
16	Primary	Fibers, no size or size	0.00	Primary	Fibers, no size or size	0.00	Primary	Fibers, no size or size	0.00	Primary	Fibers, no size or size	0.00	Primary	Fibers, no size or size	0.00	
17	Primary	Strand	1,217.89	Primary	Strand	1,217.89	Primary	Strand	1,444.00	Primary	Strand	1,202.27	Primary	Strand	1,202.27	
18	Primary	Misc	0.00	Primary	Misc	0.00	Primary	Misc	0.00	Primary	Misc	0.00	Primary	Misc	0.00	
19	Primary	Flax Meal	31.42	Primary	Flax Meal	201.84	Primary	Flax Meal	148.80	Primary	Flax Meal	114.44	Primary	Flax Meal	114.44	
20	Primary	Flax Oil	0.00	Primary	Flax Oil	0.00	Primary	Flax Oil	0.00	Primary	Flax Oil	0.00	Primary	Flax Oil	0.00	
21	Total Primary Product =	1,799.47		Total Primary Product =	2,192.20		Total Primary Product =	1,722.07		Total Primary Product =	1,344.21		Total Primary Product =	1,344.21		
22	PER of Tot. Pri. Prod./Retained Har. =	77.34%		PER of Tot. Pri. Prod./Retained Har. =	62.26%		PER of Tot. Pri. Prod./Retained Har. =	54.02%		PER of Tot. Pri. Prod./Retained Har. =	45.91%		PER of Tot. Pri. Prod./Retained Har. =	45.91%		
23																
26	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	
27	Auxiliary	Wholesale	0.00	Auxiliary	Wholesale	0.00	Auxiliary	Wholesale	0.00	Auxiliary	Wholesale	0.00	Auxiliary	Wholesale	0.00	
28	Auxiliary	H & O, western cut	0.00	Auxiliary	H & O, western cut	0.00	Auxiliary	H & O, western cut	0.00	Auxiliary	H & O, western cut	0.00	Auxiliary	H & O, western cut	0.00	
29	Auxiliary	H & O, eastern cut	0.00	Auxiliary	H & O, eastern cut	0.00	Auxiliary	H & O, eastern cut	0.00	Auxiliary	H & O, eastern cut	0.00	Auxiliary	H & O, eastern cut	0.00	
30	Auxiliary	Run	0.00	Auxiliary	Run	0.00	Auxiliary	Run	0.00	Auxiliary	Run	0.00	Auxiliary	Run	0.00	
31	Auxiliary	Fibers, white & size	0.00	Auxiliary	Fibers, white & size	0.00	Auxiliary	Fibers, white & size	0.00	Auxiliary	Fibers, white & size	0.00	Auxiliary	Fibers, white & size	0.00	
32	Auxiliary	Fibers, white, no size	0.00	Auxiliary	Fibers, white, no size	0.00	Auxiliary	Fibers, white, no size	0.00	Auxiliary	Fibers, white, no size	0.00	Auxiliary	Fibers, white, no size	0.00	
33	Auxiliary	Fibers, no size or size	0.00	Auxiliary	Fibers, no size or size	0.00	Auxiliary	Fibers, no size or size	0.00	Auxiliary	Fibers, no size or size	0.00	Auxiliary	Fibers, no size or size	0.00	
34	Auxiliary	Misc	31.42	Auxiliary	Misc	151.70	Auxiliary	Misc	108.86	Auxiliary	Misc	67.77	Auxiliary	Misc	67.77	
35	Auxiliary	Flax Meal	481.76	Auxiliary	Flax Meal	486.25	Auxiliary	Flax Meal	344.64	Auxiliary	Flax Meal	341.23	Auxiliary	Flax Meal	341.23	
36	Auxiliary	Flax Oil	14.48	Auxiliary	Flax Oil	23.22	Auxiliary	Flax Oil	15.31	Auxiliary	Flax Oil	16.70	Auxiliary	Flax Oil	16.70	
37	Total Auxiliary Product =	524.67		Total Auxiliary Product =	641.80		Total Auxiliary Product =	488.41		Total Auxiliary Product =	422.33		Total Auxiliary Product =	422.33		
38	PER of Tot. Aux. Prod./Retained Har. =	6.6%		PER of Tot. Aux. Prod./Retained Har. =	4.8%		PER of Tot. Aux. Prod./Retained Har. =	4.8%		PER of Tot. Aux. Prod./Retained Har. =	5.0%		PER of Tot. Aux. Prod./Retained Har. =	5.0%		
39																
41	Total Rec Production/Retained Har. =	0.0%		Total Rec Production/Retained Har. =	0.0%		Total Rec Production/Retained Har. =	0.0%		Total Rec Production/Retained Har. =	0.0%		Total Rec Production/Retained Har. =	0.0%		
42																
43																
44																
45	West Bldg May 17, 1992 — Peony Tractor				West Bldg May 24, 1992 — Peony Tractor				West Bldg May 31, 1992 — Peony Tractor				West Bldg June 7, 1992 — Peony Tractor			
Metric Tons				Metric Tons				Metric Tons				Metric Tons				
47	Retained Harvest =	14.87		Retained Harvest =	122.32		Retained Harvest =	42.75		Retained Harvest =	37,071.52		Retained Harvest =	37,071.52		
48	Dumped =	233.30		Dumped =	471.25		Dumped =	212.43		Dumped =	4,812.72		Dumped =	4,812.72		
49	Dumped %	132.93%		Dumped %	353.4%		Dumped %	568.36%		Dumped %	12.98%		Dumped %	12.98%		
51	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	
52	Primary	Wholesale	0.00	Primary	Wholesale	0.00	Primary	Wholesale	0.00	Primary	Wholesale	0.00	Primary	Wholesale	0.00	
53	Primary	H & O with res	0.00	Primary	H & O with res	0.00	Primary	H & O with res	0.00	Primary	H & O with res	0.00	Primary	H & O with res	0.00	
54	Primary	H & O, western cut	3.33	Primary	H & O, western cut	3.22	Primary	H & O, western cut	11.49	Primary	H & O, western cut	26.28	Primary	H & O, western cut	26.28	
55	Primary	H & O, eastern cut	1.74	Primary	H & O, eastern cut	37.28	Primary	H & O, eastern cut	13.48	Primary	H & O, eastern cut	81.71	Primary	H & O, eastern cut	81.71	
56	Primary	Run	0.00	Primary	Run	0.00	Primary	Run	0.00	Primary	Run	0.00	Primary	Run	0.00	
57	Primary	Fibers, white & size	0.00	Primary	Fibers, white & size	0.00	Primary	Fibers, white & size	0.00	Primary	Fibers, white & size	0.00	Primary	Fibers, white & size	0.00	
58	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	
59	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	
60	Primary	Fibers, no size or size	0.33	Primary	Fibers, no size or size	2.67	Primary	Fibers, no size or size	0.00	Primary	Fibers, no size or size	0.00	Primary	Fibers, no size or size	0.00	
61	Primary	Misc	0.00	Primary	Misc	0.00	Primary	Misc	0.00	Primary	Misc	0.00	Primary	Misc	0.00	
62	Primary	Misc	0.00	Primary	Misc	0.00	Primary	Misc	0.00	Primary	Misc	0.00	Primary	Misc	0.00	
63	Primary	Flax meal	0.00	Primary	Flax meal	0.00	Primary	Flax meal	0.00	Primary	Flax meal	0.00	Primary	Flax meal	0.00	
64	Primary	Flax oil	0.00	Primary	Flax oil	0.00	Primary	Flax oil	0.00	Primary	Flax oil	0.00	Primary	Flax oil	0.00	
65	Total Primary Product =	9.60		Total Primary Product =	57.24		Total Primary Product =	24.97		Total Primary Product =	1,090.70		Total Primary Product =	1,090.70		
67	PER of Tot. Pri. Prod./Retained Har. =	51.7%		PER of Tot. Pri. Prod./Retained Har. =	71.33%		PER of Tot. Pri. Prod./Retained Har. =	58.61%		PER of Tot. Pri. Prod./Retained Har. =	14.31%		PER of Tot. Pri. Prod./Retained Har. =	14.31%		
69	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	
70	Auxiliary	Wholesale	0.00	Auxiliary	Wholesale	0.00	Auxiliary	Wholesale	0.00	Auxiliary	Wholesale	0.00	Auxiliary	Wholesale	0.00	
71	Auxiliary	H & O with res	0.00	Auxiliary	H & O with res	0.00	Auxiliary	H & O with res	0.00	Auxiliary	H & O with res	0.00	Auxiliary	H & O with res	0.00	
72	Auxiliary	H & O, western cut	0.00	Auxiliary	H & O, western cut	0.00	Auxiliary	H & O, western cut	0.00	Auxiliary	H & O, western cut	0.00	Auxiliary	H & O, western cut	0.00	
73	Auxiliary	H & O, eastern cut	0.00	Auxiliary	H & O, eastern cut	0.00	Auxiliary	H & O, eastern cut	0.00	Auxiliary	H & O, eastern cut	0.00	Auxiliary	H & O, eastern cut	0.00	
74	Auxiliary	Run	0.00	Auxiliary	Run	0.00	Auxiliary	Run	0.00	Auxiliary	Run	0.00	Auxiliary	Run	0.00	
75	Auxiliary	Fibers, white & size	0.00	Auxiliary	Fibers, white & size	0.00	Auxiliary	Fibers, white & size	0.00	Auxiliary	Fibers, white & size	0.00	Auxiliary	Fibers, white & size	0.00	
76	Auxiliary	Fibers, white, no size	0.00	Auxiliary	Fibers, white, no size	0.00	Auxiliary	Fibers, white, no size	0.00	Auxiliary	Fibers, white, no size	0.00	Auxiliary	Fibers, white, no size	0.00	
77	Auxiliary	Fibers, white, no size	0.00	Auxiliary	Fibers, white, no size	0.00	Auxiliary	Fibers, white, no size	0.00	Auxiliary	Fibers, white, no size	0.00	Auxiliary	Fibers, white, no size	0.00	
78	Auxiliary	Fibers, no size or size	0.00	Auxiliary	Fibers, no size or size	0.00	Auxiliary	Fibers, no size or size	0.00	Auxiliary	Fibers, no size or size	0.00	Auxiliary	Fibers, no size or size	0.00	
79	Auxiliary	Misc	0.00	Auxiliary	Misc	0.00	Auxiliary	Misc	0.00	Auxiliary	Misc	0.00	Auxiliary	Misc	0.00	
80	Auxiliary	Misc	0.00	Auxiliary	Misc	0.00	Auxiliary	Misc	0.00	Auxiliary	Misc	0.00	Auxiliary	Misc	0.00	
81	Auxiliary	Flax meal	0.00	Auxiliary	Flax meal	0.00	Auxiliary	Flax meal	0.00	Auxiliary	Flax meal	0.00	Auxiliary	Flax meal	0.00	
82	Auxiliary	Flax oil	0.00	Auxiliary	Flax oil	0.00	Auxiliary	Flax oil	0.00	Auxiliary	Flax oil	0.00	Auxiliary	Flax oil	0.00	
83	Total Auxiliary Product =	0.00		Total Auxiliary Product =	0.00		Total Auxiliary Product =	0.00		Total Auxiliary Product =	0.00		Total Auxiliary Product =	0.00		
84	PER of Tot. Aux. Prod./Retained Har. =	0.0%		PER of Tot. Aux. Prod./Retained Har. =	0.0%		PER of Tot. Aux. Prod./Retained Har. =	0.0%		PER of Tot. Aux. Prod./Retained Har. =	0.0%		PER of Tot. Aux. Prod./Retained Har. =	0.0%		
85																
87	Total Rec Production/Retained Har. =	0.0%		Total Rec Production/Retained Har. =	0.0%		Total Rec Production/Retained Har. =	0.0%		Total Rec Production/Retained Har. =	0.0%		Total Rec Production/Retained Har. =	0.0%		
88																
89																
90																
91																
92																
93	West Bldg June 21, 1992 — Sherwood				Total (or Dates to Date (July 5, 1992) — Sherwood											
Metric Tons				Metric Tons												
95	Retained Harvest =	104.60		Retained Harvest =	1,201,17.33		Retained Harvest =			Retained Harvest =			Retained Harvest =			
96	Dumped =	0.01		Dumped =	4,999.13		Dumped =			Dumped =			Dumped =			
97	Dumped %	0.01%		Dumped %	4.1%		Dumped %			Dumped %			Dumped %			
99	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	Product Type	Product Farm	mt of Product	
100	Primary	Wholesale	0.00	Primary	Wholesale	0.00	Primary	Wholesale	0.00	Primary	Wholesale	0.00	Primary	Wholesale	0.00	
101	Primary	H & O with res	0.00	Primary	H & O with res	0.00	Primary	H & O with res	0.00	Primary	H & O with res	0.00	Primary	H & O with res	0.00	
102	Primary	H & O, western cut	0.00	Primary	H & O, western cut	0.00	Primary	H & O, western cut	0.00	Primary	H & O, western cut	0.00	Primary	H & O, western cut	0.00	
103	Primary	H & O, eastern cut	0.00	Primary	H & O, eastern cut	0.00	Primary	H & O, eastern cut	0.00	Primary	H & O, eastern cut	0.00	Primary	H & O, eastern cut	0.00	
104	Primary	Run	0.00	Primary	Run	0.00	Primary	Run	0.00	Primary	Run	0.00	Primary	Run	0.00	
105	Primary	Fibers, white & size	0.00	Primary	Fibers, white & size	0.00	Primary	Fibers, white & size	0.00	Primary	Fibers, white & size	0.00	Primary	Fibers, white & size	0.00	
106	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	
107	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	Primary	Fibers, white, no size	0.00	
108	Primary	Fibers, no size or size	0.00	Primary	Fibers, no size or size	0.00	Primary	Fibers, no size or size	0.00	Primary	Fibers, no size or size	0.00	Primary	Fibers, no size or size	0.00	

	DI	DK	DL	DM	DN	DO	DP
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42							
43							
44							
45	Total for Dates to Date (July 3, 1992) — Primary Trust						
46	Market Trust						
47	Remaind Market =		438,988.22				
48	Chances =		48,494.58				
49	Chances %		13.55%				
50							
51	Product Type	Product Name	mt of Product	% of Product		Primary Trusts Total	
52	Primary	Wholesale	149.31	0.21%		Primary Trusts Total	
53	Primary	H & O with rev	493	0.01%		Primary Trusts Total	
54	Primary	H & O, various cat	21,591	0.49%		Primary Trusts Total	
55	Primary	H & O, various cat	1,302.04	2.88%		Primary Trusts Total	
56	Primary	Rm	3,534	0.79%		Remaind Market =	438,988.22
57	Primary	Fibres, white & rls	162.23	0.23%		Primary products	67,323.66
58	Primary	Fibres, white, no rls	26.23	0.11%		(- Pk. Mail) =	
59	Primary	Fibres, w/rls, no skin	98.99	0.14%		Non-mail PRR =	14,506
60	Primary	Fibres, no skin or skin	12,876.24	17.87%			
61	Primary	Beans	46,071.22	43.94%			
62	Primary	Misc	6,311.58	8.68%			
63	Primary	Pub mail	4,134.74	5.74%			
64	Primary	Pub mt	0.00	0.00%			
65	Total Primary Products =		72,006.50	100.00%			
66							
67	PRR - Tot. Pri. Prod./Ret. Mar. =		15.77%				
68							
69	Product Type	Product Name	mt of Product				
70	Auxiliary	Wholesale	0.00				
71	Auxiliary	H & O with rev	0.00				
72	Auxiliary	H & O, various cat	0.00				
73	Auxiliary	H & O, various cat	0.00				
74	Auxiliary	Rm	11,770.33				
75	Auxiliary	Fibres, white & rls	0.00				
76	Auxiliary	Fibres, white, no rls	0.00				
77	Auxiliary	Fibres, w/rls, no skin	0.00				
78	Auxiliary	Fibres, no skin or skin	0.00				
79	Auxiliary	Beans	84.30				
80	Auxiliary	Misc	51,423				
81	Auxiliary	Pub mail	1,034.27				
82	Auxiliary	Pub mt	36.23				
83	Total Auxiliary Products =		22,164.33				
84							
85	PRR of Tot. Aux. Prod./Returned Mar. =		4.9%				
86							
87	Total Recovery (All Products) =		20.42%				
88							
89							
90							
91	Total for Dates to Date (July 3, 1992) — Primary Trust & Membership						
92	Market Trust						
93	Remaind Market =		372,447.39				
94	Chances =		72,192.27				
95	Chances %		19.41%				
96							
97	Product Type	Product Name	mt of Product	% of Product			
98	Primary	Wholesale	919.43	1.08%			
99	Primary	H & O with rev	493	0.01%			
100	Primary	H & O, various cat	376.00	0.44%			
101	Primary	H & O, various cat	1,541.14	1.81%			
102	Primary	Rm	37.97	0.04%			
103	Primary	Fibres, white & rls	162.23	0.19%			
104	Primary	Fibres, white, no rls	617.73	0.72%			
105	Primary	Fibres, w/rls, no skin	98.99	0.12%			
106	Primary	Fibres, no skin or skin	14,880.99	17.17%			
107	Primary	Beans	60,997.22	71.2%			
108	Primary	Misc	978.03	1.14%			
109	Primary	Pub mail	3,134.68	3.68%			
110	Primary	Pub mt	0.00	0.00%			
111	Total Primary Products =		81,492.22	100.00%			
112							
113	PRR - Tot. Pri. Prod./Ret. Mar. =		14.84%				
114							
115	Product Type	Product Name	mt of Product				
116	Auxiliary	Wholesale	0.00				
117	Auxiliary	H & O with rev	0.00				
118	Auxiliary	H & O, various cat	0.00				
119	Auxiliary	H & O, various cat	0.00				
120	Auxiliary	Rm	12,827.08				
121	Auxiliary	Fibres, white & rls	0.00				
122	Auxiliary	Fibres, white, no rls	0.00				
123	Auxiliary	Fibres, w/rls, no skin	0.00				
124	Auxiliary	Fibres, no skin or skin	0.00				
125	Auxiliary	Beans	84.30				
126	Auxiliary	Misc	2,378.03				
127	Auxiliary	Pub mail	13,184.93				
128	Auxiliary	Pub mt	393.00				
129	Total Auxiliary Products =		30,787.36				
130							
131	PRR of Tot. Aux. Prod./Returned Mar. =		5.37%				
132							
133	Total Recovery (All Products) =		20.31%				
134							
135							
136							

TU: TEDDY

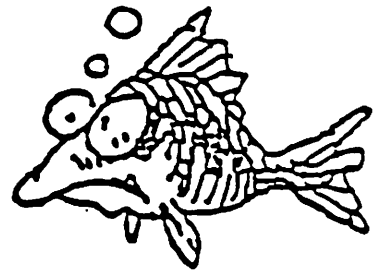
SPECIES CODE LIST

<u>SPECIES</u>	<u>CODE</u>	<u>SPECIES</u>	<u>CODE</u>
Sablefish (Blackcod)	710	Unspecified Demersal Rockfish	168
Arrowtooth Flounder	121	Bocaccio Rockfish	137
Flathead Sole	122	Canary Rockfish	146
Rock Sole	123	China Rockfish	149
Dover Sole	124	Copper Rockfish	138
Rex Sole	125	Quillback Rockfish	147
Butter Sole	126	Redstripe Rockfish	158
Yellowfin Sole	127	Rosethorn Rockfish	150
English Sole	128	Silvergray Rockfish	157
Starry Flounder	129	Tiger Rockfish	148
Petrale Sole	131	Yelloweye Rockfish	145
Sand Sole	132	Unspecified Pelagic Rockfish	169
Alaska Plaice	133	Black Rockfish	142
Greenland Turbot	134	Blue Rockfish	167
Pacific (Gray) Cod	110	Dusky Rockfish	154
Pollock (Whiting)	270	Widow Rockfish	156
		Yellowtail Rockfish	155
		Unspecified Slope Rockfish	144
Sculpin	160	Pacific Ocean Perch	141
Skate	700	Northern Rockfish	136
Greenling	190	Rougheye Rockfish	151
Atka Mackerel	193	Sharpchin Rockfish	166
Other Finfish		Shortraker Rockfish	152
Shark	689	Redbanded Rockfish	153
Eulachon	511		
Smelt	510		
Capelin	516		
Thornyhead Rockfish (Idiot)	143		

DELIVERY CONDITION CODES

1	Wholefish/food fish	20	Fillets with skin and ribs
2	Whole bait	21	Fillets with skin, no ribs
3	Bled only	22	Fillets with ribs, no skin
4	Gutted only	23	Fillets, no skin or ribs
5	Headed and Gutted	30	Surimi
6	Headed and Gutted, with roe	31	Minced fish
7	H & G, Western cut	32	Fish meal
8	H & G, Eastern cut	33	Fish oil
9	H & G, with pectoral girdle	97	Other - specify
10	H & G, tail removed	98	Discarded at sea
11	Kirimi	99	Landed discard
12	Salted and split		
13	"Wings"		
14	Roe only		
15	Pectoral girdle only		
16	Heads		
17	Cheeks or chins		

**North
Pacific
Longline
Association**



August 3, 1992

Mr. Richard B. Lauber, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue
Anchorage, AK

**RE: Halibut Bycatch in BSAI Longline Cod Fishery;
Industry Response, Council Response**

Dear Rick:

As you are aware, hook-and-line fishermen have encountered unexpectedly high halibut bycatch in their BSAI fishery for Pacific cod during June and July. Industry is taking action to reduce halibut bycatch and mortality this season, and to find out where and when the problem has occurred so that preventive measures can be implemented next season. We are hopeful that the Council will match our efforts by adopting the regulatory authorities listed below.

I. Industry Response

We are taking the following actions to reduce halibut bycatch and associated mortality:

A. Halibut Mortality Reduction Campaign - We have printed 1,000 halibut bycatch handling placards developed in cooperation with the IPHC, and have distributed them throughout the longline fleet; we plan a public relations campaign to emphasize the need to reduce halibut mortality;

B. Cutting Gangions - All freezer-longliners have been asked to cut gangions as close to the hook as possible on all halibut bycatch, releasing the fish before they come in contact with the boat; the objective is to reduce injury to halibut in an easily observable manner;

C. Observers - We have distributed NMFS Observer Program instructions to observers throughout the fleet, providing for verification of halibut handling techniques; and

D. Observer Data Analysis - We have requested that all freezer-longliners release confidential observer data for 1992 so that Fisheries Information Services can do an

analysis which will assist us in reducing halibut bycatch in the future (please see attached data analysis proposal).

II. Council Response

There are several actions which the Council could take to assist in this effort, most of which would respond to prior requests from industry:

A. **BSAI Amendment 21** - In written and oral testimony we have asked that fixed gear halibut PSC be divisible by area as well as by time and fishery. There is evidence that in certain areas, chronically high halibut bycatch occurs. There is also a growing consensus in industry that so long as the assumed bycatch rate is reduced to more closely approximate reality, a requirement that gangions be cut on halibut bycatch should be implemented through regulation. We would like these elements to be included in Amendment 21. We continue to believe that the best way to release halibut is by "shaking" - twisting the hook out with a gaff - but we are willing to cut gangions until alternative release methods are approved;

B. **Seasonal Apportionment of BSAI Cod TAC** - There is evidence that halibut bycatch is particularly high in the hook-and-line fishery in the summer months. During this post-spawning dispersion period cod are in relatively poor physical condition, and do not command good prices. CPUE's are low, and bycatch of migrating halibut is high. Prices do not rise until winter, when demand for cod is highest. The Council should have authority to close this summer fishery, or to reduce it to minimal levels. The NPLA has sponsored the gathering of data and an initial biological analysis of the proposed seasonal apportionment amendment. It would be most helpful if the Council would prioritize completion of the EA/RIR so that cod TAC could be seasonally apportioned in 1993 - and halibut bycatch reduced.

C. **Reconsideration of 1992 Fixed Gear Cap** - BSAI Amendment 19, not yet implemented, contains a proposed 750 mt fixed gear halibut PSC cap, for 1992 only. This cap was imposed on the fixed gear fleet without the industry negotiation process which has preceded such limitations on other groups. During debate on the issue last December several Council members emphasized that not enough information was available on the new fixed gear fleet to select a rational halibut PSC cap, and that in any event the analysis of impacts over the proposed range of values was narrow and incomplete. They suggested that a decision be delayed until appropriate analysis could be completed. Those Council members who favored immediate selection of a fixed gear cap made it clear that they did not wish the cap to curtail the fishery. It was assumed that the fleet could maintain its previous halibut bycatch rates, and that a 750

mt cap would allow the fishery proceed unconstrained through the 1992 season.

New information - which became available after the Council's decision but before Secretarial approval of Amendment 19 - indicates that these key assumptions were incorrect (please see attached graph on 1991/1992 catch and bycatch). The 750 mt halibut cap was reached during the week ending July 24. Enforcement of this cap will severely curtail the hook-and-line fishery, and will cause bankruptcies within the fleet. This result is contrary to the stated purposes of the Council in adopting the cap.

We would like to request that the Council reconsider the cap, and recommend to the Secretary that it not be implemented for 1992. The attached table by Fisheries Information Services (Estimated Halibut Needs) suggests that the hook-and-line fishery could continue until BSAI cod TAC is achieved, for as little as 250-350 mt of additional halibut mortality.

Hook-and-line representatives have argued since June of 1991 that our fishery should not be held to a higher standard of performance than other gear types, and that we should receive an equal amount of halibut PSC. Despite our request for fair treatment we received only 750 mt of halibut PSC for all our 1992 BSAI fisheries, while the Council approved an apportionment of 2,359 mt to the trawl fishery for cod alone. Further, significant trawl overruns - beyond the 5,333 mt trawl cap - are tolerated. In 1991, trawlers took 779 mt of halibut in addition to the overall cap (please see attached NMFS report). In 1992 the revised cap for the trawl cod fishery has been exceeded by 119 mt, the pollock/Atka mackerel/other cap by 75 mt (please see FIS Bycatch Newsheet No. 101, attached). This latter number will continue to grow as the pollock fishery with "pelagic" trawls continues. We cannot help feeling that there is a double standard at work here, and that we are bearing the brunt of it. Our new industry simply needs a bit of the consideration given to the trawl industry in the early years of its development.

The grossly unfair nature of the recommended fixed gear cap is best illustrated by the drastic impact of a premature closure of the BSAI longline fishery for cod - many of the newly-formed freezer-longliner companies will be forced into bankruptcy (please see attached letter from Northern Aurora Fisheries). For 1992 only, the cap should be dropped.

D. Establishment of a Realistic 1993 Cap - In light of recent developments, we are hopeful that the Council will select a realistic halibut PSC cap for hook-and-line gear under Amendment 21. We are confident that over time we can reduce halibut bycatch and associated mortality

substantially - but we should be given a fair share of the available halibut PSC initially.

Industry responded rapidly as soon as the halibut bycatch problem became apparent. We hope that the Council will match our efforts by providing some relief for the balance of the 1992 season, and by making it possible to structure the 1993 fishery to minimize halibut bycatch.

Thank you for your attention.

Sincerely,

Thorn
Thorn Smith

halcp16

FIS

7/31/92 DATA ANALYSIS PROCESS FOR BSAI HOOK-AND-LINE VESSELS.

PURPOSES

1. To discover and correct errors in the NMFS data base.
2. To develop a "by week and 3 digit area" database for the Cod target fishery.

SCOPE

1. All vessels which agree to release data (currently 48).
2. Initial concentration on data post May 24, 1992.

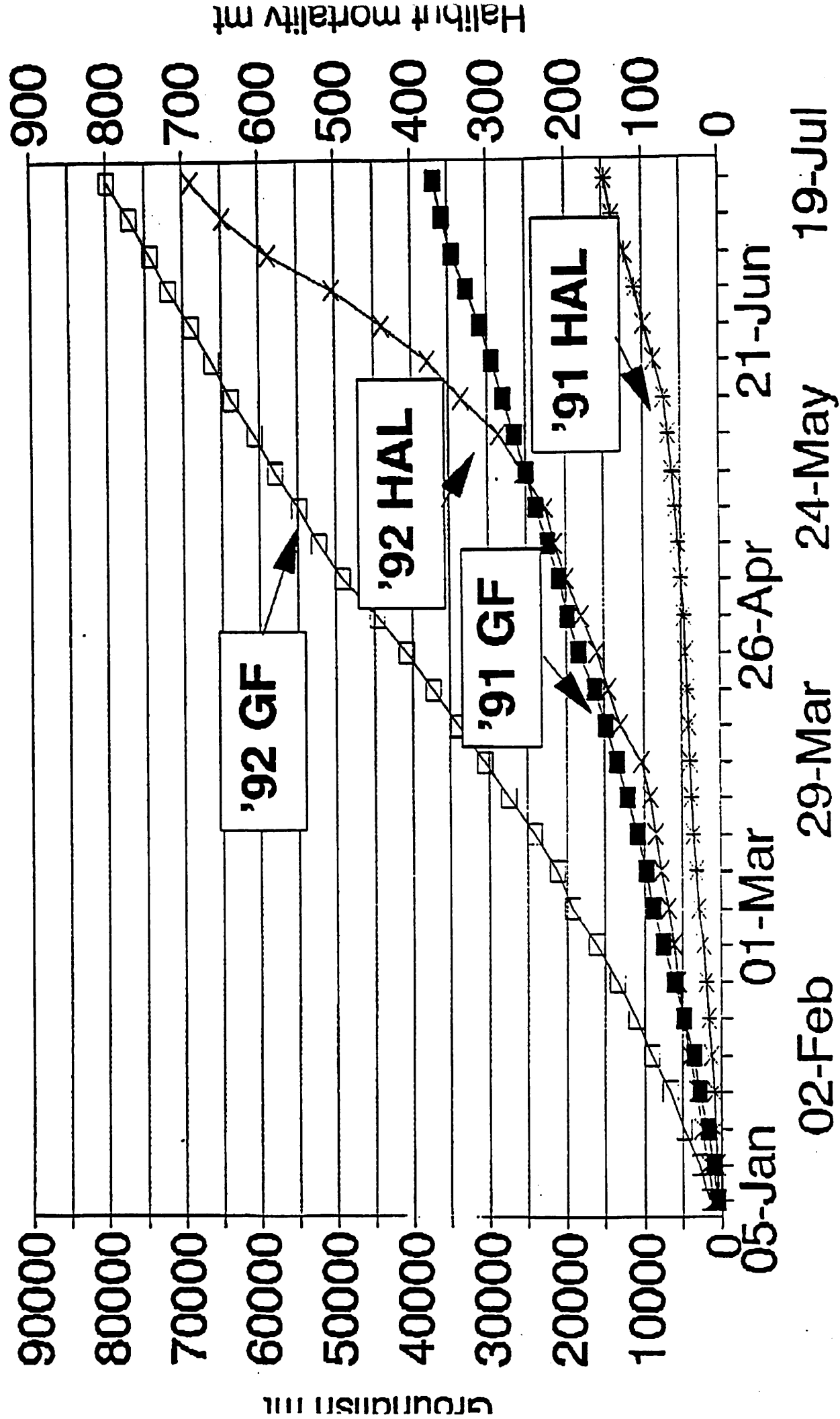
PROCEDURES

1. Database Development
 - a. Obtain OBSERVER radio report data (AFSC) and CATCH data (NMFS AK Regional Office)
 - b. Put both files into spreadsheet/database formats.
2. Analyses
 - a. Internal analysis of Observer database
 - develop Pacific halibut average weights;
 - look for outlier points in rates, tonnages.
 - compare vessel data in same week/area stratum;
 - identify outlier data.
 - b. Internal analysis of Reported catch data
 - on an individual vessel basis, look for outliers in weekly data.
 - look at catch composition.
 - c. Comparison Observer and Reported catch data
 - compare observer's reported groundfish tonnage and vessel's; identify inconsistencies.
 - compare observer's reported fishing area(s) with vessel's; identify inconsistencies.
 - analyze halibut bycatch for vessels with high levels of non-cod (eg. sablefish, turbot) groundfish reports vs. those with mostly cod catches.
 - d. Develop statistical analyses and graphics: eg. within-stratum vessel variability, observer coverage tables.
 - e. Analysis of how observer data patterns are affecting NMFS' R.O.'s total bycatch extrapolation procedure.
3. Contacts
 - a. Initial
 - Halibut Commission staff for range of expected weights.
 - Observer program staff for sampling procedures
 - Regional Office staff to verify internal data control procedures, extrapolation procedures,
 - b. Follow-up
 - Vessel owners to identify problem data.
 - NMFS staff to identify problem data.
4. Corrections
 - a. Key punch errors, duplicates can be corrected promptly.
 - b. Suspected reporting errors require 2-3 weeks.
 - c. Suspected sampling errors cannot be corrected until return of observer.

RESULTS

1. Corrected data will result in revisions to 1992 bycatch estimates.
2. Database can be used to develop information for better fishing strategies in 1993.
3. Possible revision to NMFS' total bycatch estimation procedure if it can be demonstrated that observer coverage patterns are leading to skewed results.

BSAI HOOK AND LINE PACIFIC COD TARGET



Keep

FIS
7/31/92

ESTIMATED HALIBUT (MORTALITY) NEEDS
AT DIFFERENT RATES OF CATCH AND MORTALITY

NEEDS FOR ONE WEEK

GF/WEEK	MORT.	RATES: KG/MT GROUND FISH			
		80	100	120	140
3000	0.16	38	48	58	67
	0.12	29	36	43	50
	0.08	19	24	29	34
3500	0.16	45	56	67	78
	0.12	34	42	50	59
	0.08	22	28	34	39
4000	0.16	51	64	77	90
	0.12	38	48	58	67
	0.08	26	32	38	45

NEEDS FOR 10 WFFKS (from July 1st)

GF/WEEK	MORT.	RATES: KG/MT GROUND FISH			
		80	100	120	140
3000	0.16	384	480	576	672
	0.12	288	360	432	504
	0.08	192	240	288	336
3500	0.16	448	560	672	784
	0.12	336	420	504	588
	0.08	224	280	336	392
4000	0.16	512	640	768	896
	0.12	384	480	576	672
	0.08	256	320	384	448

NEEDS FOR 8 WEEKS (from July 1st)

GF/WEEK	MORT.	RATES: KG/MT GROUND FISH			
		80	100	120	140
3000	0.16	307	384	461	538
	0.12	230	288	348	403
	0.08	154	192	230	269
3500	0.16	358	448	538	627
	0.12	269	336	403	470
	0.08	179	224	269	314
4000	0.16	410	512	614	717
	0.12	307	384	461	538
	0.08	205	256	307	358

NMFS/AKR
06/16/92

1991 BERING SEA/ALEUTIAN ISLANDS FISHERIES
TRAWL HALIBUT BYCATCH

TRAWL HALIBUT
BYCATCH IN EXCESS
OF CAP-1991

WEEK	FLATFISH		ROCK SOLE		TURBOT		'OTHER'	
	HALIBUT		HALIBUT		HALIBUT		HALIBUT	
	WK	CUM	WK	CUM	WK	CUM	WK	CUM
01/06	0	0	37	37	0	0	115	115
01/13	0	0	38	75	0	0	153	269
01/20	0	0	20	95	0	0	109	378
01/27	0	0	19	114	0	0	197	575
02/03	0	0	14	128	0	0	112	687
02/10	0	0	62	189	0	0	114	801
02/17	0	0	66	255	0	0	140	941
02/24	0	0	262	516	0	0	137	1078
03/03	0	0	246	762	0	0	104	1182
03/10	0	0	119	881	0	0	173	1355
03/17	0	0	26	907	0	0	101	1456
03/24	0	0	0	907	0	0	132	1588
03/31	0	0	0	907	0	0	51	1640
04/07	0	0	1	909	0	0	272	1912
04/14	0	0	0	909	0	0	240	2151
04/21	0	0	1	909	0	0	245	2396
04/28	0	0	9	918	0	0	208	2604
05/05	19	19	19	937	115	115	194	2798
05/12	23	41	17	954	265	380	29	2827
05/19	25	66	49	1003	28	407	19	2846
05/26	15	82	106	1108	0	407	19	2865
06/02	5	87	18	1126	0	407	8	2873
06/09	9	96	4	1130	0	407	17	2890
06/16	10	106	0	1130	0	407	14	2904
06/23	22	128	0	1130	0	407	21	2926
06/30	31	159	0	1130	0	407	21	2947
07/07	14	173	0	1130	0	407	164	3110
07/14	46	219	0	1130	0	407	96	3206
07/21	43	263	0	1130	0	407	36	3242
07/28	57	320	0	1130	0	407	27	3269
08/04	94	414	0	1130	0	407	151	3420
08/11	53	466	0	1130	0	407	57	3477
08/18	31	497	0	1130	0	407	83	3560
08/25	51	548	0	1130	0	407	48	3608
09/01	29	577	0	1130	0	407	80	3688
09/08	39	615	0	1130	0	407	31	3720
09/15	72	688	0	1130	0	407	0	3720
09/22	26	714	0	1130	0	407	0	3720
09/29	18	732	0	1130	0	407	0	3720
10/06	21	753	0	1130	0	407	0	3720
10/13	14	767	0	1130	0	407	0	3720
10/20	9	775	0	1130	0	407	26	3746
10/27	3	776	0	1130	0	407	47	3793
11/03	0	776	0	1130	0	407	3	3796
11/10	0	776	0	1130	0	407	1	3797
11/17	0	776	0	1130	0	407	2	3799

TRAWL
HALIBUT PSC
OVERRUN,
1991
IN EXCESS
OF CAP!

1991 Yearly Halibut Allowances:

Primary	660	908	165	2667
% taken	117.52%	124.52%	246.93%	142.45%

Secondary	800	1100	200	3233
% taken	96.95%	102.73%	203.72%	117.52%
	-24	+30	+207	+566

1st - 3rd Quarter Halibut apportionments to the 'OTHER' fishery:

PRIMARY apportionment	2667
% taken	142.46%

SECONDARY apportionment	3233
% taken	117.52%

+ 779 CATCH OVER CAP

X.75 = 584 MT MORTALITY
OVER CAP

NOTE: Primary Halibut Apportionments close Zones 1, 2H
Secondary Halibut Apportionments close ALL BS, AI

Data based on observer reports, extrapolated to total groundfish harvest. Estimates for all weeks may change due to incorporation of late or corrected data.



MANAGEMENT ACTIONS & NEWS

This edition is abbreviated because of late posting of NMFS reports. A Monday issue is planned.

A NMFS NR posted yesterday stated that daily observer reports for rockfish are no longer required.

A NMFS NR posted this morning noted that herring PSC bycatch amounts are revised (more info. in Monday's NS) and a HSA closure is rescinded: that portion of HSA 2 which is outside Zone 1 will reopen for directed fishing with trawls for yellowfin sole at noon, August 3.

A NMFS NR posted this afternoon states that directed fishing for sablefish with hook-and-line gear in the Western Gulf area will be closed at noon, August 5. Retainable sablefish bycatch will be less than 4%.

Recent Report Updates:

Reports for week ending July 24 were updated around 2:00 today.



HOOK-AND-LINE STATUS GULF OF ALASKA

Reported cumul. halibut mortality through 7/26 is 519 mt or 75% of 700 mt 1st and 2nd trimester quota. Mortality for the week was only 4 mt.

FIXED GEAR STATUS BERING SEA/ALEUTIAN ISLANDS

The combined H & L and Pot halibut mortality is estimated to be 781 mt or 104% (up 8%) of 750 mt proposed cap.

Halibut (catch, not mortality) rates (kg/mt) estimated for cod fishery, last five weeks are: 141, 208, 136, 81, 90.

Halibut catches (mt) were 414, 520, 410, 299, 258.

TRAWL STATUS GULF OF ALASKA

The Gulf-wide mortality of Pacific halibut through 7/26 is 1,482 mt or 90% (up 3%) of combined 1 - 3rd Q cap of 1,600 mt. This is a "quota to watch".



BERING SEA/AL. ISL.

The yellowfin sole target fishery shows 260 mt of halibut or 61% (up 2%) of current cap of 424 mt.

The rock sole/other flatfish target fishery (closed July 1 in Zone 1 and 2H) now shows 692 mt which is 92% (up 1%) of its annual secondary cap of 755 mt.

The rockfish target fishery (reopened June 29 and closed July 8) is still 184 mt or 93% taken of 200 mt annual cap.

The Pacific cod target fishery (closed May 6) shows a revised halibut est. of 1,656 mt or 108% of 1,537 cap.

The Pollock/Atka mackerel/other target fishery shows an increase to 1,767 mt, or 104% of its 1,692 mt cap. This amount will continue to increase, since the required closure to trawling with other than pelagic gear has already occurred.

FIS is not responsible for the accuracy of information provided to us or results of actions based on the information herein provided.

**NORTHERN AURORA
FISHERIES, INC.**

**MR. STEVE PENNOYER
DIRECTOR, ALASKA REGION
NATIONAL MARINE FISHERIES SERVICE
POBOX 21688
JUNEAU, AK. 99801-1688**

DEAR MR PENNOYER:

THE PURPOSE OF THIS LETTER IS TO REQUEST THAT YOU DISAPPROVE THE 750 METRIC TON BSAI FIXED GEAR HALIBUT CAP FOR 1992 WHICH IS CONTAINED IN AMENDMENT 19.

I AM THE OWNER AND OPERATOR OF THE FREEZER LONGLINER "NORTHERN AURORA" WHICH FISHES FOR COD IN THE BERING SEA. OUR OPERATION BEGAN LATE JANUARY OF 1992. AND FROM DAY ONE WE HAVE MADE EVERY EFFORT TO RELEASE ALL HALIBUT IN A MANNER TO INSURE THEIR SURVIVAL. WHEN WE RECEIVED A NOTICE ON CUTTING THE GAGNIONS ON ALL HOOKED HALIBUT, WE THEN STARTED RELEASING THEM ONLY BY THAT METHOD.

IT APPEARS TO US THAT THE CAP WAS ARBITRARILY SET. THE LONGLINE FLEET HAS EXPANDED RAPIDLY THIS YEAR INCLUDING THE " PART TIMERS", AND IT IS UNREASONABLE TO ASSUME THAT THE BY-CATCH RATES WOULD BE AS THEY HAVE BEEN THE LAST TWO YEARS. WHY NOT GIVE US THE SAME HALIBUT PSC AS OUR COMPETITION? ANYWAY, WE BELIEVE THAT THE 1992 CAP SHOULD BE DISPROVED, AND THAT THE COUNCIL SHOULD HAVE AN OPPORTUNITY TO PURSUE A REASONABLE FIXED GEAR CAP IN SEPTEMBER.

I CAN NOT, OBVIOUSLY, SPEAK FOR ALL THE LONG LINE BOATS IN ALASKA, BUT I DO KNOW FOR A FACT THAT MY VESSEL AND THE OTHER FREEZER LONGLINERS IN THE FLEET THAT I HAVE HAD ANY CONTACT WITH HAVE BEEN VERY CONSCIOUS OF THE HALIBUT PROBLEM AND HAVE RELEASED HOOKED HALIBUT CAREFULLY ALL YEAR LONG BEFORE THEY COME ON BOARD, THEREFORE, I THINK THE MORTALITY FOR 1992 SHOULD BE RECALCULATED AT THE 8% MORTALITY RATE.

IF THE 750 CAP IS ENFORCED, MY COMPANY WILL PROBABLY BE FORCED INTO BANKRUPTCY. MY BANKER HAS ALREADY PREWARNED ME OF THIS POSSIBILITY. MY COMPANY, ALONG WITH MANY OTHERS, ARE NEW THIS YEAR. I PURCHASED A BOAT, RECONDITIONED IT, BOUGHT GEAR AND SYSTEMS, AND OUTFITTED THE BOAT WITH MOSTLY BORROWED MONEY. IT IS EXTREMELY IMPORTANT TO BE ABLE TO FISH THE WHOLE YEAR. ACTUALLY, IT WILL TAKE A FEW YEARS JUST TO BUILD UP RESERVES TO BE ABLE TO SURVIVE CONTINGENCIES SUCH AS THIS. I SPECIFICALLY ENTERED THE LONGLINE FISHERY RATHER THAN THE TRAWL FISHERY BECAUSE OF THE LOW BY-CATCH NOT ONLY OF HALIBUT BUT OF OTHER SPECIES AS WELL.

**THERE IS ANOTHER FACTOR THAT SHOULD BE CONSIDERED AND THAT IS THE FACT THAT MANY NATIONS RELY ON BERING SEA LINE CAUGHT COD. AND SINCE THERE IS NOW A GREATER EFFORT THAN EVER TO REDUCE HALIBUT BY-CATCH. I HOPE THAT YOU WILL DISAPPROVE THE 750 MT CAP FOR 1992
THANK YOU.**

F. DALE DIER

F. Dale Dier
PRESIDENT - MANAGER

FIV NORTHERN AURORA

**410 BELLEVUE WAY S.E., SUITE 304, BELLEVUE, WA 98004
(206) 450-0187 FAX (206) 450-0189**

FIS
7/31/92

BERING SEA/ALEUTIAN ISLANDS PACIFIC COD TARGET FISHERIES

	1990			1991			1992 *		
	<u>H & L</u>	<u>POTS</u>	<u>TRAWL</u>	<u>H & L</u>	<u>POTS</u>	<u>TRAWL</u>	<u>H & L</u>	<u>POTS</u>	<u>TRAWL</u>
GROUND FISH MT	51,007	1418	178,075	69,792	4,361	94,287	81,031	7,001	67,349
PACIFIC COD %	92.6%	N/A	53.9%	88.1%	N/A	76.0%	88.5%	98.7%	60.0%
PACIFIC COD MT	47,232	N/A	95,982	61,511	N/A	71,661	<u>71,712</u>	6,912	<u>40,409</u>
HALIBUT MT	1,723	22	3,135	2,559	38	1,838	4,384	42	1656
HALIBUT MORT %	16%	10%	100%	16%	10%	100%	16%	10%	75%
HALIBUT MORT. MT	276	2	3135	409	4	1838	<u>701</u>	4	<u>1242</u>
CHINOOK SALMON NO	7	N/A	4,466	41	0	3,675	6	0	4,425
RED KING CRAB NO.	N/A	N/A	N/A	76	2713	178	N/A	N/A	151
B. TANNER CRAB NO.	N/A	N/A	N/A	8,286	52,482	364,851	N/A	N/A	188,862

* THROUGH 7/19

NOTES: CATEGORIES USED ARE DEFINED AS FOLLOWS:

1990 "O" - Pollock and Pacific cod \geq 50%, Pacific cod \geq 5% of retained catch

1991 "C" - Pacific cod is \geq 45% of groundfish catch.

1992 "C" - Pacific cod is dominant species in retained catch

BYCATCH NUMBERS ARE EXTRAPOLATED NUMBERS USED BY NMFS REGIONAL OFFICE
FOR INSEASON MANAGEMENT

SOME NMFS REPORTS ARE INCOMPLETE OR UNAVAILABLE, FOR EXAMPLE
CRABS IN THE BSAI IN 1990

CRAB BYCATCH IN NON-TRAWL GEAR IN 1992

1992 Pacific cod tons since July 19 and gangion cutting percentage reported by observers, BSAI hook-and-line gear.

	TONS	GANGION CUT %	
		JUL 19	JUL 26
1	28.50		43.9
2	87.89		
3	124.80		
4	245.14	79.7	
5	36.65	43.3	63.2
6	299.91	75.4	73.6
7	618.74		89.5
8	41.84		
9	207.29		
10	45.56		
11	88.19	84.2	67.6
12	36.91		
13	145.33		
14	171.98	74.4	41.9
15	96.01		
16	59.20	89.5	
17	115.92	92.6	98.9
18	138.89	47.0	40.7
19	393.53		2.2
20	49.98		
21	122.98		
22	231.37		
23	16.65		93.6
24	161.52		94.8
25	217.85	23.2	23.0
26	131.96		49.8
27	140.70	85.6	89.8
28	66.96		
29	131.63	72.3	74.3
30	119.52		
31	321.30		51.8
32	203.70		
33	130.43		49.1
34	111.78		
35	256.05		
36	294.89		97.5
37	574.21		
38	143.26	0.0	0.0

* not observed,

 16%

38

19 observed. 4 over 90% 13 had 50% or more.

NMFS Alaska Region
G.R. Tromble

August 5, 1992

1992 BSAI hook-and-line catcher-processors

Pacific cod catch and halibut bycatch in 'C' target

	P. cod tons	halibut*
	-----	-----
All vessels	74,518	733.5
Vessels >= 125'	66,433 (89%)	656.1 (89%)
<hr/>		
New Vessels '92	14,982 (20%)	124.2 (17%)
Old Vessels	59,536 (80%)	609.3 (83%)

*no sign. diff
new + old.*

* halibut mortality computed at 16% rate

New vessels were vessels that landed Pacific cod in 1992 using hook-and-line gear that had no report of hook-and-line gear in 1991. Some are new vessels, others may be converted from other gear types.

AMERICAN INDEPENDENT FISHERMEN

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ALEUTIAN CHALLENGER

NORDIC STAR

AMERICAN BEAUTY

BARBARA LEE

DISTANT WATER

GOLDEN FLEECES

GUNMAR

STARFISH

MARGUN

RET LYN

MARK I

MORNING STAR

MUER MILACH

NEAKKANE

NORDIC FURY

STARLIGHT

QUEEN VICTORIA

OCEANIC

OCEAN LEADER

PACIFIC ALLIANCE

PACIFIC CHALLENGER

PACIFIC FURY

RD

TREMONT

VESTERALLEN

January 31, 1992

Mr. Steven Pennoyer
Regional Director
NOAA/NMFS
P.O. Box 21668
Juneau, Alaska 99802-1668

Mr. Richard H. Schaefer
Office of Fisheries
Conservation and Management
NOAA/NMFS
1335 East-West Highway
SSMC 1, Room 8472
Silver Spring, Maryland 20910

Dear Mr. Pennoyer and Mr. Schaefer:

This letter provides our association's comments on the North Pacific Fishery Management Council's (NPFMC) Shoreside Preference Amendment 18/23.

We are fishermen and we operate catcher trawlers. In the North Pacific fishery, we catch primarily pollock and cod, and we work in the Bering Sea/Aleutian Islands, as well as the Gulf of Alaska. Most of us have worked these waters since the beginning of groundfish fisheries off Alaska in the early 1980s.

American Independent Fishermen is composed of 24 trawlers. We are all American owned and many are also family owned. Our boats are all U.S. built, operated by ourselves and other U.S. citizens, financed by U.S. banks, and all but one are powered by U.S. engines. We sell fresh fish and we sell it where ever we can find markets. Our fish sales pay for our vessels' mortgages, their upkeep, the crews' and their families' homes, and all the associated taxes. Check us out. You won't find our vessels on Judge Penn's list, you won't find foreign ownership packaged to various degrees in U.S. corporate ribbons, you won't find foreign subsidized loans, you won't find our money pouring overseas to "the homelands," and you won't find foreign nationals in our wheelhouses as so-called "advisors."

Our vessels are primarily 100-130 feet in length. We played a dominant role in developing the groundfish fisheries off Alaska. We pioneered the JV pollock fisheries and sold to foreign ships because there were no U.S. buyers, at sea or onshore.

When there were onshore buyers, we sold to them until they went bankrupt (e.g., New England Fish Company, Alaska Foods, and Eagle Fisheries). We played a major role in the displacement of foreign factory trawlers and replacement of foreign processing and broke the back of the long endured foreign processing market dominance -- or at least we thought we did.

We believe the present Shoreside Preference Amendment 18/23 package has many faults and that in order to best serve American fishermen and our nation, it must be rejected. Many of our "procedural concerns" were earlier addressed in our January 6, 1992, letter which focused on NEPA defects. This letter focuses on the procedural and legal concerns and on the merits of the issue. The merits of the issue from the perspective of American Independent Fishermen are that Amendment 18/23:

1. Allocates Bering Sea/Aleutian Islands and Gulf of Alaska pollock and cod between at-sea and shoreside processors and dictates where catcher vessels will deliver their catches.
2. For the first time in American fisheries history eliminates the American fisherman's right to sell his catch to whomever he or she wants. In this instance, to sell cod or pollock to the best market available.
3. Promotes processor control, and largely foreign processor control, of the fishing industry and sets the stage for processors to become extensively vertically integrated -- at the expense of the independent fishermen.
4. Pre-empts independent catcher vessels with processor-owned catcher vessels and provides no recognition of our catch histories.
5. Provides windfall profits to processor-controlled catcher vessels which can be realized due to vertical integration at the vessel level, the local processor level, and in most cases at the parent company level in foreign countries.
6. Reduces the at-sea trawler fleets' historic rights to the pollock and cod fisheries by 65%-70%, thereby threatening the livelihoods of independent fishermen while providing windfall profits to processor-controlled catcher vessels.

PROCESSOR VERTICAL INTEGRATION

To examine these issues, we have first compiled a detailed listing of catcher vessels, their size and pollock hold capacities, and their ownership -- for each of the five Dutch Harbor/Akutan shoreside plants (Exhibit 1) as well as the two pollock processing motherships which operate as inshore processors (Exhibit 2).

For each catcher vessel, we have provided, to the best of our knowledge, details which document catcher vessel control.

Our information indicates that seven inshore processing facilities employ 41 catcher trawlers. Twenty-six of these trawlers (63%) are presently processor owned and market controlled. Eleven of these 26 vessels are what we call new or recent acquisitions. There has been a flurry of vessel purchases even during the past few months. Trident purchased four large trawlers, Nippon Suisan/Universal bought one and took delivery of a second, Taiyo/Alyeska purchased one and also took delivery of a second, and Taiyo/Westward took delivery of its new 150-ft, 4,500-hp, 680-mt hold capacity *Chelsea K*. This tidal wave of new construction of an already overcapitalized industry are factory trawlers without factories. (See attached article.)

Exhibits 1 and 2 also tabulate catcher vessel pollock hold capacity which is a good measure of a vessel's relative importance in the onshore marketplace. Exhibit 3 summarizes this catcher fleet's hold capacity information by plant as "processor controlled" or "independent controlled." The inshore fleet's pollock hold capacity totals about 10,406 mt, of which 6,862 mt, or 65.9%, is controlled by plant ownership and only 3,544 mt, or 34.1%, remains owned by independent fishermen. Pick any point in time prior to the Council's discussion of the inshore/offshore allocation and determine plant ownership of catcher vessels in the pollock fleet. You'll see that it was rare (i.e., less than 5%). Plant ownership/control has already directly impacted our livelihoods -- the most traditional of all groundfish trawlers. Where is the analysis of this impact in Amendment 18/23 and how does giving plants, and primarily foreign-owned plants, control over the markets benefit the nation? It doesn't exist. This makes the analysis fatally flawed.

In addition to the inshore processors, six at-sea motherships also process Bering Sea/Aleutian Islands pollock. These processors are identified in Exhibit 4, along with their respective fleets of catcher vessels. All of these 24 catcher vessels are former JV trawlers and do not utilize their fishholds. Note that 18 of these 24 trawlers (75%) are independently owned and that the largest of the processors (*Ocean Phoenix*) is owned primarily by the catcher vessels themselves. Also, note that only six of these 24 trawlers are controlled by the processors -- and that both motherships owning trawlers have Japanese ownership (*Golden Alaska/Nichiro* and *Excellence/Taiyo/Westward*). What happens to these independent harvester vessels when they are thrown in with the factory trawlers is not analyzed. The financial impact will be even more severe for the small catcher fleet, since we will not be able to fish safely in weather that the factory trawler fleet can. This will not put us on a level playing field.

Exhibit 5 summarizes catcher vessel ownership/control which occurs with the at-sea motherships in number of vessels and percent -- much as was done in Exhibit 3 with the inshore fleet.

POLLOCK PRICE CONCERNS

Vertically integrated processors, whether they be ashore or at sea, have the option of taking their profits from any level of their business. They can take their profits at the catcher vessel level if their vessels are paid competitive prices for their fish, or they can minimize prices at the vessel level, pass the profits through to the plant or mothership, and keep the benefits at the sales end. If the processor is foreign owned and the product is, in turn, exported overseas for sale via their parent company in Japan, for example, the vertically integrated business may choose to take all the profits at the overseas parent company level and simply keep the other entities at a breakeven point. Discussions on where to take profits, given several options, are made in view of where the company benefits the most with the least adverse economic consequences, including taxes.

In contrast with the vertically integrated business, independently owned vessels must profit at the vessel level. Also, they must compete with vessels owned by the vertically integrated companies. When the vertically integrated companies own/control 66% of the catcher vessels delivering Bering Sea/Aleutian Islands pollock to inshore plants, it is not difficult to see who is standing behind the door when the paychecks are handed out.

Could this explain why so many independent fishermen have sold their vessels to vertically integrated buyers?

During the past 11 years (1981-1991), U.S. trawlers have sold pollock to processors for 4¢ - 12¢/lb. The average price in 1991 was 9¢/lb. For the final opening (five days) in the fall of 1991, the price jumped to 12¢ for a very small quota.

American factory trawlers harvesting pollock in the Soviet Zone during the fall of 1991 were paying 18¢/lb for quota -- the right to catch pollock still in the water.

In the initial joint venture fisheries for pollock, ex-vessel prices were 6.5¢/lb and Japanese factory ship-produced surimi (average of grades) sold for 338¥/kg, or 61¢/lb, at the ¥/\$ exchange rate of 221. Thus, ex-vessel round pollock sold for 10.6% of the product's value. How has the ex-vessel pollock value to surimi value ratio changed in recent years? Exhibit 6 shows that between January 1988 and September of 1991, prices paid fishermen for round pollock declined from a range of 10% to 14% of surimi prices in the first half of 1988 to 5% in July of 1991. Since July 1991, a fishermen's marketing association attempted to negotiate increased pollock prices with some success. Two shorebased processors reportedly increased ex-vessel prices to 15¢/lb for 1992. At current surimi prices of more than \$2.25/lb, 15¢/lb for pollock equates to an ex-vessel price of about 6.7% of the product's value. Everyone asked, "Would even this price increase have occurred if the proposed inshore/offshore allocation were in place and inshore plants didn't

have to worry about competing with factory trawlers and at-sea motherships for access to product?"

WINDFALL PROFITS FOR PROCESSOR-CONTROLLED CATCH VESSELS

On April 19, 1989, then Secretary of Commerce Mosbacher provided a report to Congress pertaining to the Anti-Reflagging Act of 1987. In part, that report documented the names and sizes of groundfish trawl vessels in the U.S. JV fleet off Alaska in 1988. This fleet totaled 128 vessels with an average length of 106 ft and 4.3 years of experience as JV trawlers (Attachment 1).

At the June 1991 NPFMC meeting, Steve Hughes, on behalf of Midwater Trawlers Cooperative, provided the Council with a preliminary analysis of pollock catches obtained by catcher vessels during 1986-1990. While some estimates had to be made to complete this analysis, the results showed that catcher vessels (JVP and inshore DAP and offshore motherships DAP) during this five-year period accounted for 65%-69% of the entire Bering Sea/Aleutian Islands pollock catch (Exhibit 7). While not all JV trawlers fished pollock, the majority did and pollock was the vast majority of JV tonnage.

Since June 1991, industry has asked the NMFS for more detailed catch data to further investigate catcher vessel catch histories. These data have now been provided by NMFS in more detail and they confirm the earlier analysis. For the 1986-1990 period, U.S. vessels harvested 6,212,701 mt of pollock. Catcher vessel harvests totaled 4,042,816 mt, equaling 65.1%, and factory trawlers harvested 2,169,885 mt, equaling 34.9%. Tabular details of pollock catches logged by trawlers delivering to shoreside processors, motherships, and JV processors contrasted with factory trawler catchers are provided in Exhibit 8. Graphic presentations for the Bering Sea/Aleutian Islands are provided in Exhibit 9 for the Bering Sea/Aleutian Islands and Exhibit 10 for the Gulf. More detailed catch history graphics are also provided as Attachment 2.

In reviewing Exhibits 8-10 which provide pollock catch histories all the way back to 1980, it must be noted that the factory trawlers were the late arrivals in the Bering Sea/Aleutian Islands and the Gulf of Alaska. They had virtually no pollock fishery before 1985--we did, and we accounted for 100% of the 1980-1984 domestic harvest delivering to at-sea motherships.

The American Independent Fishermen believe that the NPFMC's Amendment 18/23 gives away most of the catcher vessel catch histories to the inshore processors who, in turn, have depressed market prices, built their own new catcher vessels to utilize these catch histories, plus acquired JV vessels from fishermen to bolster their catcher fleet control. Clearly, under Amendment 18/23, after three years 45% of the Bering Sea/Aleutian Islands pollock TAC (assume 1,300,000 mt) will be allocated directly to inshore processors, about 585,000 mt.

Our earlier analysis indicated 66% of the Bering Sea/Aleutian Islands inshore pollock fleet's hold capacity is presently controlled by vertically integrated processors. If this component of the fleet does not move toward further vertical integration, 386,100 mt of pollock (66% x 585,000 mt) will very likely be caught by 26 processor-controlled trawlers. Catch per vessel equates to 14,850 mt if the existing 15 independent trawlers are also provided markets and 22,500 mt if the independent trawlers are thrown out and the 26 processor-controlled trawlers harvest their allotted 585,000 mt -- a very likely possibility, given no at-sea competition.

At the current market price of 15¢/lb (\$330/mt), 386,000 mt of pollock will generate \$127,413,000 of sales. 585,000 mt of pollock will generate \$193,050,000 of sales. These sales equal \$4.9 million per processor-controlled trawler if markets are also provided for independent trawlers and \$7.4 million per catcher vessel if the independent trawlers are thrown out -- again the likely scenario. If you were an independent trawler allowed into this select group's market, would you do much complaining? You would be thrown out in a second!!

Given that most 100-125 ft JV pollock trawlers grossed about \$1.5-\$2.2 million annually and that their economic breakeven point is at the low end of this sales range, the future economic return to this limited fleet of inshore vessels, or their controlling plants, constitutes a clear and substantial windfall profit.

Profit for the processors who own these 26 processor-controlled vessels is much greater. Current prices for Alaska pollock produced surimi easily exceed \$2.25/lb, and a fair ex-vessel price for shorebased delivered pollock easily equals 20¢/lb (only 8.9% of product value). At this price (remembering U.S. factory trawlers are paying the Russians 18¢/lb -- for the privilege of catching pollock), income for the 26 processor-owned trawlers jumps to \$6.5 million per vessel if independents operate, or \$9.9 million per vessel if the processor-controlled vessels take the entire 585,000 mt.

This windfall is directly augmented by processor-controlled markets. It benefits, at the expense of others, seven inshore processors of which five are foreign owned. This is discriminatory to the detriment of most independently/American-owned trawlers, inconsistent with the National Standards, and absolutely contrary to the intent of the Magnuson Act. It cannot be denied that Shoreside Preference Amendment 18/23 guarantees control of much of the Bering Sea/Aleutian Islands/Gulf of Alaska pollock resource to the big three Japanese companies (Taiyo, Nippon Suisan, Nichiro) and strengthens their grasp on their already dominant control of the world surimi market (*Seafood Processing: Foreign Ownership of Facilities in Alaska, Oregon, and Washington*, GAO report to Senator Frank Murkowski, July 1991). Providing even greater concentrations of power and control to these foreign dominated shoreplants is a clear violation of National Standard 4(C) of the Magnuson Act, since it provides the onshore fleet

and onshore processors "an excessive share of such privileges." 16 U.S.C. § 1851 (a)(4)(C).

ECONOMIC LOSSES TO AT-SEA CATCHER FLEET ARE ENORMOUS

In contrast to this windfall profit to the shorebased operation, if Shoreside Preference Amendment 18/23 goes into effect, the pollock vessels delivering to at-sea motherships will suffer a devastating economic loss. If you compare what these vessels would earn if they were allocated their historic catch levels from 1986 to 1990 to what they will receive under Shoreside Preference Amendment 18/23, the lost revenue is approximately 65%-70%. Even if you compare their revenue under open access in 1991 when competing with the factory trawler fleet and the new shorebased fleet, their lost revenue will be as much as 45%. This pioneering pollock fleet will suffer such losses because they will be allocated only a much drastically reduced share of the pollock quota and then be forced to compete with the much larger factory trawler fleet which can catch fish in much deeper water than the smaller catcher vessels and in heavy weather when the small boats cannot do so safely.

This economic loss will reduce the gross revenues of the harvester pollock fleet to below the \$1.5 million to \$2 million of gross revenue minimum needed for these boats. This will make the pollock fleet now delivering to at-sea motherships no longer economically viable. Instead, these vessels will be forced to increase their catch capacity and to increase their ability to withstand all kinds of weather in order to deliver onshore to compete with the new wave of the shorebased fleet which are factory trawlers without factories. Many vessels are too small to make those conversions and will be forced out of the fishery. These independent fishermen will no longer have any markets because there will be too many boats vying for too few slots. This will put in jeopardy the recent price gains made by the Fishing marketing Association. With independent fishermen without any viable markets, the present independent shorebased fishermen will have lost its bargaining power. The foreign dominated processors could tell them to accept their offer or be replaced by independent fishermen who are willing to take that price in order to obtain a shorebased market. As a result, American catcher vessels' share of surimi revenue will most likely go down to below 5% of revenue generated from shorebased surimi. This is a clear violation of National Standard 4(A) of the Magnuson Act, since this allocation is not "fair and equitable to all such fishermen." 16 U.S.C. § 1851 (a)(4)(A)

Addressing this issue at the labor force level, our captains and crews are traditionally paid a percentage of the value of the vessels' gross incomes. Their wages are impacted by fish price and volume of catch. Under the processor-controlled trawler system, two changes will likely be instituted (we hear that they already are) to reduce income to the U.S. crews: (1) Reduce price per pound to the vessels and take the profits higher up the chain, and (2) pay the crews a modest salary, thereby scrapping our traditional incentive pay system. These practices

will be at the expense of U.S. captains and their crews, will decrease personal incomes, decrease taxes, decrease benefits to our nation, and pad the pockets of foreign-owned processors.

**THE PROCESSOR PREFERENCE AMENDMENT
DOES NOT GIVE PROCESSORS PREFERENCE OVER U.S. FISHERMEN**

We refer you to the July 11, 1978, Congressional Record H6393 and the discussion on the floor of the House, of House Resolution 13340, known as the "Processor Preference Amendment" PL 95-354. "This amendment was unanimously voted out of the House Merchant Marine and Fisheries Committee and had the support of all segments of the fishing industry, including both our domestic and distant water fishermen, our domestic seafood processors, and Departments of State and Commerce." (Mr. Studds, Massachusetts)

Mr. Forsythe (New Jersey), the ranking minority member of the subcommittee, stated:

It is, therefore, not intended that U.S. fishermen must satisfy the requirement of U.S. processors before the fishermen can sell fish to a foreign processor. Nor is it intended that U.S. fishermen should be compelled to sell their products to U.S. processors. If, for example, U.S. fishermen cannot come to an acceptable agreement with U.S. processors, it is not the committee's intent that fishermen be forbidden from harvesting and selling that fish. I would hope and expect that every reasonable effort should be made to insure that the capacity of U.S. fish processors is satisfied. However, it is not the committee's intent, nor is it my intent, to force fishermen and processors into a business arrangement which they would not voluntarily enter into otherwise. Mr. Speaker, HR 13340 will provide the foundation upon which the U.S. fish processing industry may expand and realize the full benefits of the FCMA.

Mr. Ruppe (Michigan), the ranking member of the full committee, goes on to say:

Mr. Speaker, I rise in strong support of HR 13340 which will provide U.S. processors with the opportunity and the means to fully utilize the fishery resources found with 200 miles of the U.S. coast. By providing U.S. fish processors with preferential access to this resource, HR 13340 provides the economic foundation upon which the fish processing industry can be fully developed. ... I should point out, however, that it is not the committee's intent to require U. S. fishermen to sell their products to U.S. fish processors if the two parties are unable to agree on contract terms.

It is not the committee's intent to put fishermen at the mercy of fish processors to the extent that if fish processors have the capacity to process the fish harvested, the fishermen, in turn, would have to sell at whatever

price the processors themselves would offer. It should be understood that we in no way want to make the fishing industry subject to the terms and conditions that might be unilaterally established by the U.S. processors industry.

It should be noted that Mr. Young of Alaska, Mr. AuCoin of Oregon, and Mr. Clausen and Mr. Leggett (Majority Ranking) of California, all with constituents fishing Alaska groundfish, endorsed the above.

Senator Stevens, for himself, and Senator Magnuson, in a jointly prepared statement before the full Senate, agreed that the objectives of both bodies, the House Merchant marine and Fisheries Committee, and the Senate Committee on Commerce, Science, and Transportation, were the same and were arrived at "after detailed study, consultation, and cooperation."

What the Processor Preference Amendment did was to provide a vehicle that established general priorities that would govern licensing procedures for foreign processing vessels.

1. The first and highest to fish caught and processed by the U.S. fishing industry.
2. The second to fish caught by U.S. fishermen and purchased by foreign processing vessels.
3. The third and lowest to foreign fishermen.

At no time and in no place did it talk of preferences between different segments of the U.S. fishing industry after Levels 2 and 3 (those with foreign components) were phased out. Indeed, when looking at the debate in both houses of Congress, the members felt that the U.S. processor had equal footing with U.S. harvesters in relation to the foreign component, that is, a level playing field. They were then expected to go out, get established, and compete for their position in the same way U.S. harvesters did. Many of them did without any further preference. In the period between the Processor Preference Amendment, 1978, and the Anti-Reflagging Act of 1987, several shore plants and factory trawlers were built and operated under the first priority without any other preferential or protectionist help. Examples of these are: *American No. 1, Arctic Trawler, Aleutian Trawler, Northern Glacier, Rebecca Irene, Golden Alaska, Tremont, Vaerdal, Aleutian Bounty, Pacific Bounty*. Several of the Arctic Alaska Enterprise boats also were launched during this period. Great Lands I, Dutch Harbor and Alaska Pacific Seafoods, Kodiak, are shoreplants that were built during this period.

The common denominator in the majority of this expansion of the DAP component during these years is independent fishermen. Those same

independent fishermen realized the potential of the Magnuson Act and first participated in joint ventures to get a foothold in the fishery.

During these years the fishery was orderly, much easier to manage, and not over-capitalized. It was only later, with the passage of the Anti-Reflagging Act of 1987 and its wide-open loophole, that the fishery got out of control with over-capitalization by large corporate entities (many of them foreign), both shoreside and at sea.

During this later expansion, misinterpretation of the Processor Preference Amendment started to evolve. Processors located on shore, even though foreign owned, especially those that came most recently, felt that they could obtain preference over U.S. at-sea processors because they had the balance of the North Pacific Fishery Management Council. As a result of their lobbying, the Council began to interpret the law contrary to the intent of Congress, and the result is Shoreside Preference Amendment 18/23.

It should be made clear that Congress in no way intended, nor did they write into law, a preference of processors over fishermen. Indeed, they made clear that American fishermen were not to be placed at the mercy of U.S. processors, nor were they to be subject to terms and conditions that might be unilaterally established by the U.S. processor industry. Further, if one were to interpret the above closely, the independent American fisherman's (harvester's) right to harvest and sell his fish under free and open market conditions was given the highest priority of all.

By being forced to deliver onshore, the independent harvester component is made less efficient:

[When delivering to a mothership offshore] ... the catcher vessel's productive time is radically enhanced. In a traditional shorebased processing operation, a catcher vessel is forced into an operating mode that requires the catcher to spend most of her time functioning in a non-income producing situation as a "freighter" and a "floating warehouse."

...The catcher vessels in such a fishery cannot "stay on" the fish, since time must be spent scouting for fish at the start of each trip and this deducts effort from productive fishing.

...Equivalent economies of specialized functions can accrue to large trawler-processor ships. The vessel is released from the necessity of catching its own product and can concentrate exclusively on processing, with reduced labor inputs and radically reduced operating costs.

--Capt R. Barry Fisher, "The Joint Venture Fishery for Yellowfin Sole - Bering Sea Summer 1980: A case study in fishery development sponsored by

the Alaska Fisheries Development Foundation and the North Pacific Fishery Management Council."

Since Shoreside Preference Amendment 18/23 will force increased costs onto the old JV pollock fleet now delivering to at-sea processors, i.e., increasing their vessel size, hold capacity, and forcing those vessels to transport the fish to shore, the Shoreside Preference Amendment violates National Standard 7 which requires these regulations to "minimize costs and avoid unnecessary duplication." Section 1851 (a)(7)

It is also becoming apparent that the independent harvesting component may have to subsidize the Gulf of Alaska shoreside component in the form of price reductions in order for the onshore processors to remain competitive and profitable. See the NMFS memo of July 31, 1991, from Rebecca Tuttle Baldwin, Industry Economist, NMFS/REFM, to Lewis E. Querirolo, Alaska Regional Economist, NMFS, which states as follows:

2) In the course of adjusting the model's inputs to reflect council staff's assumptions, it has become apparent that for all inshore processing types in Kodiak, negative annual returns exist under the base case and most of the scenarios. Even under Alt 3.3, which gives 100% of the GOA pollock and 80% of the Pacific cod to inshore sections, only one plant type (SS3) has positive returns and the processing sector as a whole still has negative returns. This is a significant point. To the extent that the model approximates the prevailing conditions in this sector, these results suggest that even the total transfer of GOA pollock inshore will not result in a profitable processing sector in Kodiak. For example, when projecting a transfer of 1,000 lbs of pollock from offshore use to onshore, the offshore processors (the factory trawlers) have a decrease of \$46 in income compared to a \$23 increased income for shoreside plants, with a resultant net loss of \$23 due to the transfer. When incorporating the harvesting activities of the factory trawlers, the offshore sector still has a loss of \$34. It is only when the profitability of the harvesting trawlers delivering to the inshore plants is included that the transfer results in a net gain to the combined inshore operations of \$12 per 1,000 lbs of pollock transferred. One implication from this finding is that at some point in the future there must be some adjustment made in the relative profitability of the inshore processing and harvesting sectors (in order for processing to remain a viable industry) and how that adjustment is made will have an effect on the total community impacts presented in the draft SEIS. Thus the DEIS should incorporate more detail on the critical assumptions that drive the profitability of the various sectors and the results should be re-examined, given those implications.

As can be seen from the above economic analysis, the Shoreside Preference Amendment 18/23 is in actuality an economic allocation which reduces the

overall efficiency of the pollock and cod fleet, which is in clear violation of National Standard 5:

(5) Conservation and management measures shall, where practicable, promote efficiency in the utilization of fishery resources; except that no such measure shall have economic allocation as its sole purpose. Section 1851 (a)(5)

In summary, we feel that Shoreside Preference Amendment 18/23:

1. reduces efficiency - efficient independent offshore harvesters already established with catch histories are being pre-empted/displaced by relatively recent vessels with much shorter catch histories in a much less efficient shoreside delivery mode.
2. is solely an economic allocation - the Shoreside Preference Amendment 18/23 by its nature is providing a protectionist windfall for shorebased processing at the expense of the offshore industry.

The Shoreside Preference Amendment 18/23 is also in violation of National Standard 4: "Conservation and management measures shall not discriminate between resident of different states." Section 1852(a)(4)

It discriminates among members of different states because of a massive job transfer to Alaska. Pacific Northwest-based processing and harvesting is being pre-empted by this Alaska shorebased allocation. We understand that more than 2,500 jobs will be transferred from Pacific Northwest residents to Alaska residents.

Shoreside Preference amendment 18/23 exceeds the regulatory authority of the Secretary, since fishing privileges can be allocated only among "various United States fishermen." Section 301 (a)(4) Here, the allocation is made not among fishermen, but on to whom they deliver. Once the at-sea quota of pollock is gone in the Bering Sea, a pollock fisherman with an historic catch record loses the right to continue fishing even though the fishery is still open unless he takes those fish out of the EEZ and goes into internal state waters (i.e., Alaskan waters). This is then not an allocation among "United States fishermen," but an allocation to processors, since we are forced to enter state waters and deliver fish to a shorebased plant as a condition of fishing. We know of no other law or regulation in the history of the United States fisheries that has dictated which U.S. processors a fisherman must fish for. Shoreside Preference Amendment 18/23 is even more offensive, since it forces American fishermen to deliver to foreign processors over American processors! The Council is telling fishermen that if they want to fish in federal waters in the Gulf of Alaska or the Bering Sea when the at-sea processing quota is gone, they must sell their fish to highly

concentrated, foreign-dominated processors over which the Council has no authority. The Council's action is against the national interest.

CONCLUSION

We challenge Shoreside Preference Amendment 18/23 as being the best use of the nation's valuable Alaska pollock resource; we challenge its equity; we challenge processor control; and we challenge the loss of independent fishermen's livelihood. Amendment 18/23 was supposed to address and solve a pre-emption problem. It has clearly become a fight between the big money boys, American Factory Trawler Association, and Pacific Seafood Processors Association. The only truly American-owned entity, independent fishermen, have been lost in the shuffle and gobbled up in the fight between inshore and offshore processors. American independent fishermen are being pre-empted under this proposed action, pure and simple. The freedom to sell our fish in a free enterprise and open market system is quickly being lost, as is our opportunity to make a living the American way.

Our traditional catch histories must be honored in a new allocation system, rather than be allocated to processors. For the above reasons, the Secretary should reject Shoreside Preference Amendment 18/23 and advise the Council to promulgate amendments to the MFCMA which establish an allocation system based upon fishermen's historic participation in these fisheries while preserving the fishermen's option to compete in a free enterprise system and to sell our catches on the open market.

Yours truly,

Board Members of the Inshore/Offshore Committee of the American Independent Fishermen:

By: 
Captain Frank B. Bohannon

By: 
Robert T. Czeisler

The above are also signing for Captain Dave Fraser, President, American Independent Fishermen, and for Captain Scott Hovik, Vice President, American Independent Fishermen, who are both at sea fishing.

copy: Senator Brock Adams
Senator Slade Gorton
Senator Bob Packwood
Senator Ted Stevens

Speaker Thomas S. Foley
Representative Les AuCoin
Representative Peter DeFazio
Representative Jim McDermott
Representative John Miller
Representative Jolene Unsoeld
Representative Al Swift

Exhibit 1 Ownership and Capacities of Catcher Vessels Delivering Bering Sea/Aleutian Area Shorebased Pollock Processing Facilities in Western Alaska.

PROCESSING FACILITY	FACILITIES CATCHER VESSELS	SIZE (FT)	SIZE (HP)	POLLOCK HOLD CAPACITY (MT)	FORMER JV (YES/NO)	PLANT OWNED (YES/NO)	COMMENTS
Taiyo/Westward Dutch Shoreplant Primarily Japanese Owned	CHELSEA K	150	5,000	680	No	Yes (Partial)	New construction for 1992. Partial Japanese ownership.
	WESTWARD I	125	1,400	180	Yes	Yes	Owned by principal in plant.
	VIKING	145	1,800	227	Yes	Yes	Owned by principal in plant.
	AMALASKA II	180	3,000	454	Yes	Unknown	New owners, unsure of ownership.
TOTAL	4			1,541			
Processor Controlled	3			1,087			
Taiyo/Alyeska Dutch Shoreplant Japanese Owned	DESTINATION	180	4,500	450	No	Yes	Recently converted mud boat, mostly owned by principal in plant.
	SEAWOLF	150	1,800	340	Yes	Yes (Partial)	Minority owned by plant.
	MORNING STAR	148	1,800	340	Yes	No	Independently owned.
	ROYAL AMERICAN	105	850	170	Yes	No	Independently owned.
	GREAT PACIFIC	124	1,800	210	Yes	Yes	New acquisition.
TOTAL	5			1,510			
Plant Controlled	3			1,000			3 of 5 vessels plant controlled

Exhibit 1 Ownership and Capacities of Catcher Vessels Delivering Bering Sea/Aleutian Area Shorebased Pollock Processing Facilities in Western Alaska.

PROCESSING FACILITY	FACILITIES CATCHER VESSELS	SIZE (FT)	SIZE (HP)	POLLOCK HOLD CAPACITY (MT)	FORMER JV (YES/NO)	PLANT OWNED (YES/NO)	COMMENTS
Nippon Suisan/Unisea Dutch Shoreplant (two plants) Japanese Owned Nippon Suisan	AURORA	190	4,200	450	No	Yes	Partially plant owned. Recently built for plant deliveries.
	ARIGA	190	4,200	450	No	Yes	Partially plant owned. Recently built for plant deliveries.
	DEFENDER	200	6,000	500	No	Yes	Newly converted, Partially plant owned.
	ALYESKA	124	1,150	210	Yes	Yes	New acquisition
	ARGOSY	124	1,150	210	Yes	No	Independent
	ALSEA	124	1,150	210	Yes	No	Independent
	AMERICAN EAGLE	124	1,800	210	Yes	No	Independent
	STARWARD	123	1,150	210	Yes	No	Independent
	STARFISH	108	1,150	180	Yes	No	Independent
	STARLIGHT	123	1,150	210	Yes	No	Independent
	NORDIC STAR	124	1,150	210	Yes	No	Independent
	GUN-MAR	135	1,800	290	Yes	No	Independent
	SEA DAWN	110	900	180	Yes	No	Independent
TOTAL	13			3,520			
Plant Controlled	4			1,400			4 of 13 vessels plant controlled.

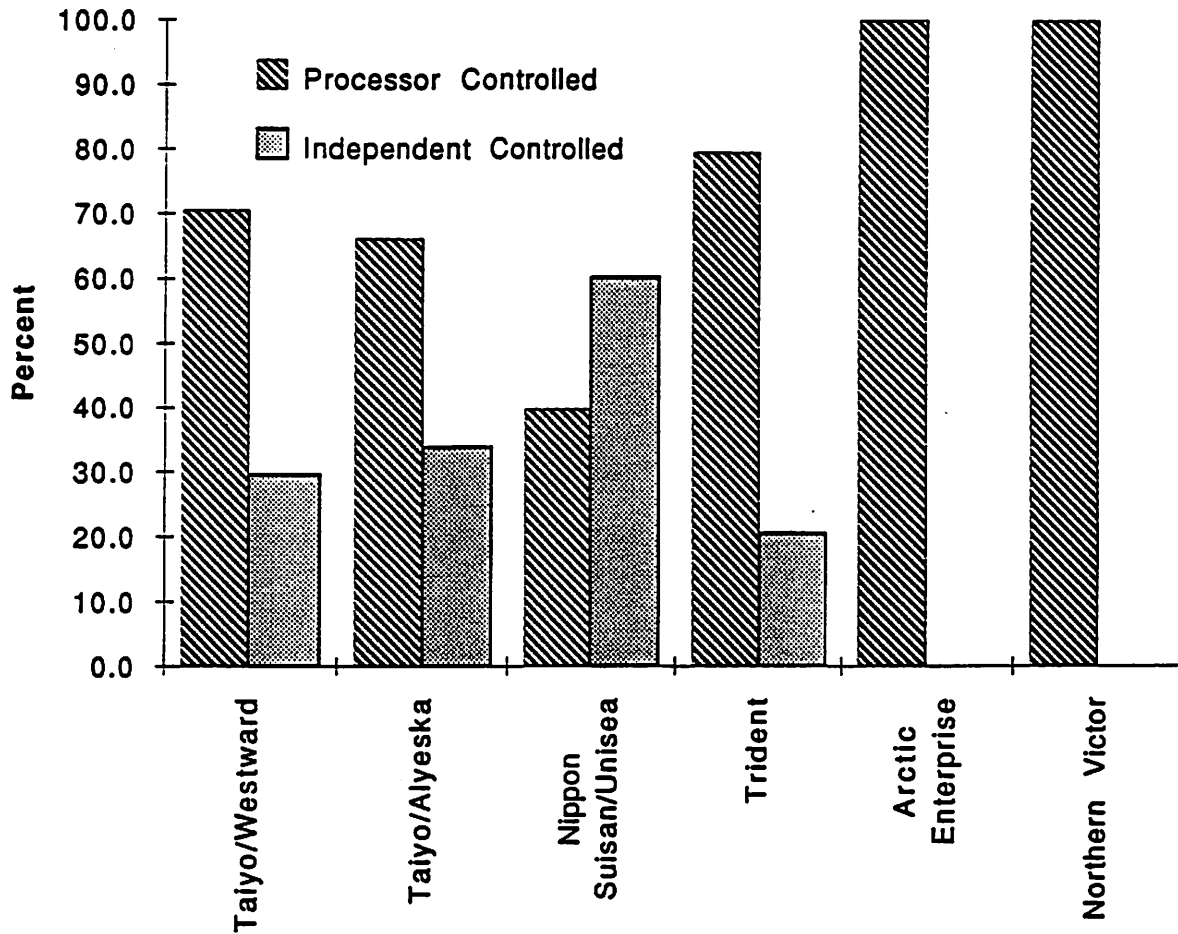
Exhibit 1 Ownership and Capacities of Catcher Vessels Delivering Bering Sea/Aleutian Area Shorebased Pollock Processing Facilities in Western Alaska.

PROCESSING FACILITY	FACILITIES CATCHER VESSELS	SIZE (FT)	SIZE (HP)	POLLOCK HOLD CAPACITY (MT)	FORMER JV (YES/NO)	PLANT OWNED (YES/NO)	COMMENTS
Trident Akutan Shoreplant U.S. Owned	ARCTURAS	135	1,500	210	Yes	Yes	Recent acquisition.
	ALDEBERON	135	1,500	210	Yes	Yes	Recent acquisition.
	COLUMBIA	124	1,150	200	Yes	Yes	
	VIKING EXPLORER	124	1,150	200	Yes	Yes	
	PACIFIC VIKING	124	1,700	200	Yes	Yes	
	U.S. DOMINATOR	124	1,500	200	Yes	Yes	Recent acquisition.
	FLYING CLOUD	124	1,500	200	Yes	Yes	Recent acquisition.
	PACIFIC PRINCE	155	2,500	360	No	Yes	Recent acquisition. 50% plant owned.
	SHARON LORRAINE	115	1,800	180	Yes	No (?)	Independent (?)
	HAZEL LORRAINE	115	1,800	180	Yes	No (?)	Independent (?)
	PEGASUS	90	850	100	Yes	No	Independent
TOTAL	11			2,240			8 of 11 vessels plant controlled.
Plant Controlled	8			1,780			

Exhibit 2 Ownership and Capacities of Catcher Vessels delivering Bering Sea/Aleutian Area Inshore Mothership Pollock Processing Facilities.

PROCESSING FACILITY	FACILITIES CATCHER VESSELS	SIZE (FT)	SIZE (HP)	POLLOCK HOLD CAPACITY (MT)	FORMER JV (YES/NO)	PLANT OWNED (YES/NO)	COMMENTS
Mothership							
ARCTIC ENTERPRISE Inshore Processor	ARCTIC II	130		180	No	Yes	Owned by Arctic Alaska
	ARCTIC III	130		180	No	Yes	Owned by Arctic Alaska
	ARCTIC IV	150		270	No	Yes	Owned by Arctic Alaska
TOTAL	3			630			
Plant Controlled	3			630			
Mothership							
NORTHERN VICTOR Inshore Processor	POSEIDON	115	1,150	170	Yes	Yes	Mothership and catcher vessel ownership interrelated but details unknown. Primary ownership in mothership is reportedly South African.
	STORM PETRAL	122	1,150	225	Yes	Yes	Mothership and catcher vessel ownership interrelated but details unknown. Primary ownership in mothership is reportedly South African.
	COMMODORE	120	1,700	200	Yes	Yes	Mothership and catcher vessel ownership interrelated but details unknown. Primary ownership in mothership is reportedly South African.
	ROYAL ATLANTIC	108	1,150	170	Yes	Yes	Mothership and catcher vessel ownership interrelated but details unknown. Primary ownership in mothership is reportedly South African.
	ALASKA PRIDE	124	1,800	200	Yes	Yes	Mothership and catcher vessel ownership interrelated but details unknown. Primary ownership in mothership is reportedly South African.
TOTAL	5			965			
Plant Controlled	5			965			

Exhibit 3: Summary of pollock hold capacity aboard processor controlled and independent fishermen controlled trawlers fishing Bering Sea/Aleutian pollock and delivering to inshore processors in Dutch/Akutan.



Processing Facility	Processor Controlled Hold Capacity		Independent Controlled Hold Capacity	
	(MT)	(%)	(MT)	(%)
Taiyo/Westward	1,087	70.5	454	29.5
Taiyo/Alyeska	1,000	66.2	510	33.8
Nippon Suisan/Unisea	1,400	39.8	2,120	60.2
Trident	1,780	79.5	460	20.5
Subtotal	5,267	59.8	3,544	40.2
Arctic Enterprise	630	100.0	0	0.0
Northern Victor	965	100.0	0	0.0
Subtotal	1,395	100.0	0	0.0
TOTAL	6,862	65.9	3,544	34.1

Exhibit 4 Ownership and Catcher Vessels Delivering Bering Sea/Aleutian Area Pollock to at Sea Motherships.

PROCESSING FACILITY	FACILITIES CATCHER VESSELS	SIZE (FT)	SIZE (HP)	POLLOCK HOLD CAPACITY (MT)	FORMER JV (YES/NO)	PLANT OWNED (YES/NO)	COMMENTS
Mothership OCEAN PHOENIX at Sea Mothership	MARGARET LYN	98	1,150	N/A	Yes	No	Catcher vessels are primarily the owners of mothership.
	MARK I	99	1,150	N/A	Yes	No	Catcher vessels are primarily the owners of mothership.
	MAR-GUN	105	1,150	N/A	Yes	No	Catcher vessels are primarily the owners of mothership.
	PACIFIC FURY	110	1,150	N/A	Yes	No	Catcher vessels are primarily the owners of mothership.
	VESTERAALLEN	124	1,150	N/A	Yes	No	Catcher vessels are primarily the owners of mothership.
	OCEANIC	124	1,150	N/A	Yes	No	Catcher vessels are primarily the owners of mothership.
	NORDIC FURY	110	1,150	N/A	Yes	No	Catcher vessels are primarily the owners of mothership.
TOTAL	<u>7</u>						
Plant Controlled	0						
Mothership GOLDEN ALASKA at Sea Processor Partial Japanese Ownership (Nichiro)	AMERICAN BEAUTY	122	1,150	N/A	Yes	Yes	Catcher vessels owned by principal(s) in mothership.
	OCEAN LEADER	120	1,150	N/A	Yes	Yes	Catcher vessels owned by principal(s) in mothership.
	ALEUTIAN CHALLENGER	86	850	N/A	Yes	Yes	Catcher vessels owned by principal(s) in mothership.
TOTAL	<u>3</u>						
Plant Controlled	3						

Exhibit 4 Ownership and Catcher Vessels Delivering Bering Sea/Aleutian Area Pollock to at Sea Motherships.

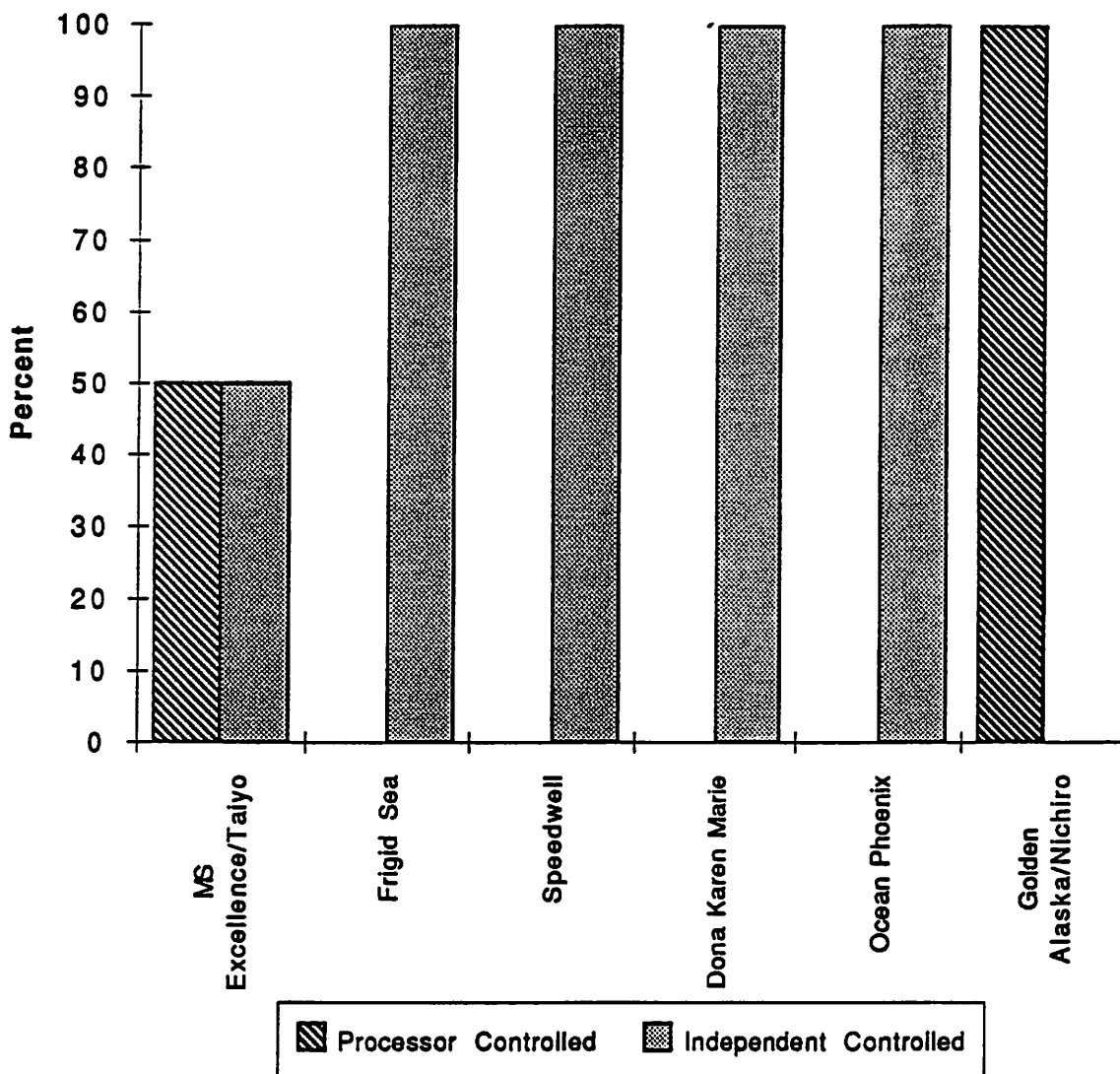
PROCESSING FACILITY	FACILITIES CATCHER VESSELS	SIZE (FT)	SIZE (HP)	POLLOCK HOLD CAPACITY (MT)	FORMER JV (YES/NO)	PLANT OWNED (YES/NO)	COMMENTS
Mothership EXCELLENCE at Sea Processor Majority Owned by Principals of Talyo/Westward Plant	PACIFIC ALLIANCE	105	1,750	N/A	Yes	Yes	New acquisition from U.S. Marshal sale. Owned by principal.
	ALASKA STAR	86	1,400	N/A	Yes	Yes	Owned by principal.
	CALIFORNIA HORIZON	86	900	N/A	Yes	Yes	Owned by principal.
	PACIFIC CHALLENGER	86	1,000	N/A	Yes	No	Independent
	NEAHKAHNE	110	1,150	N/A	Yes	No	Independent
	<u>QUEEN VICTORIA</u>	86	850	N/A	Yes	No	Independent, tied up in financial trouble.
TOTAL Processor Controlled	6 3						
Mothership FRIGID SEA at Sea Processor Korean Ownership	AMBER DAWN	110	1,150	N/A	Yes	No	Independent
	ORION	90	1,150	N/A	Yes	No	Independent
	<u>VEGA</u>	90	1,150	N/A	Yes	No	Independent
TOTAL Processor Controlled	3 0						

Exhibit 4 Ownership and Catcher Vessels Delivering Bering Sea/A
Area Pollock to at Sea Motherships.

PROCESSING FACILITY	FACILITIES CATCHER VESSELS	SIZE (FT)	SIZE (HP)	POLLOCK HOLD CAPACITY (MT)	FORMER JV (YES/NO)	PLANT OWNED (YES/NO)	COMMENTS
Mothership SPEEDWELL American Owned at Sea Processor	MUIR MILACH	86	1,150	N/A	Yes	No	Independent
	TRACY ANN	97	1,000	N/A	Yes	No	Independent
TOTAL Processor Controlled	2 0						
Mothership DONA KAREN MARIE U.S. owned at Sea Mothership	DONA LILIANA	180	2,000	N/A	Yes	No	Owners of catcher vessels purchased and converted mothership
	DONA POLITA	180	2,000	N/A	Yes	No	Owners of catcher vessels purchased and converted mothership
	DONA MARTITA	180	2,000	N/A	Yes	No	Owners of catcher vessels purchased and converted mothership
TOTAL Processor Controlled	3 0						

Exhibit 5.

At sea motherships processing Bering Sea/Aleutian pollock and their catcher vessels which are processor controlled and independent.



	Processor Controlled Vessels		Independent Controlled Vessels	
	(Number)	(%)	(Number)	(%)
MS Excellence/Taiyo	3	50	3	50
Frigid Sea	0	0	3	100
Speedwell	0	0	2	100
Dona Karen Marie	0	0	3	100
Ocean Phoenix	0	0	7	100
Golden Alaska/Nichiro	3	100	0	0
TOTALS:	6		18	

Exhibit 6: Fishermen's ex-vessel price as a percentage of average monthly surimi price exported from Alaska to Japan, January 1988-September 1991.

Source: NMFS Market News Reports

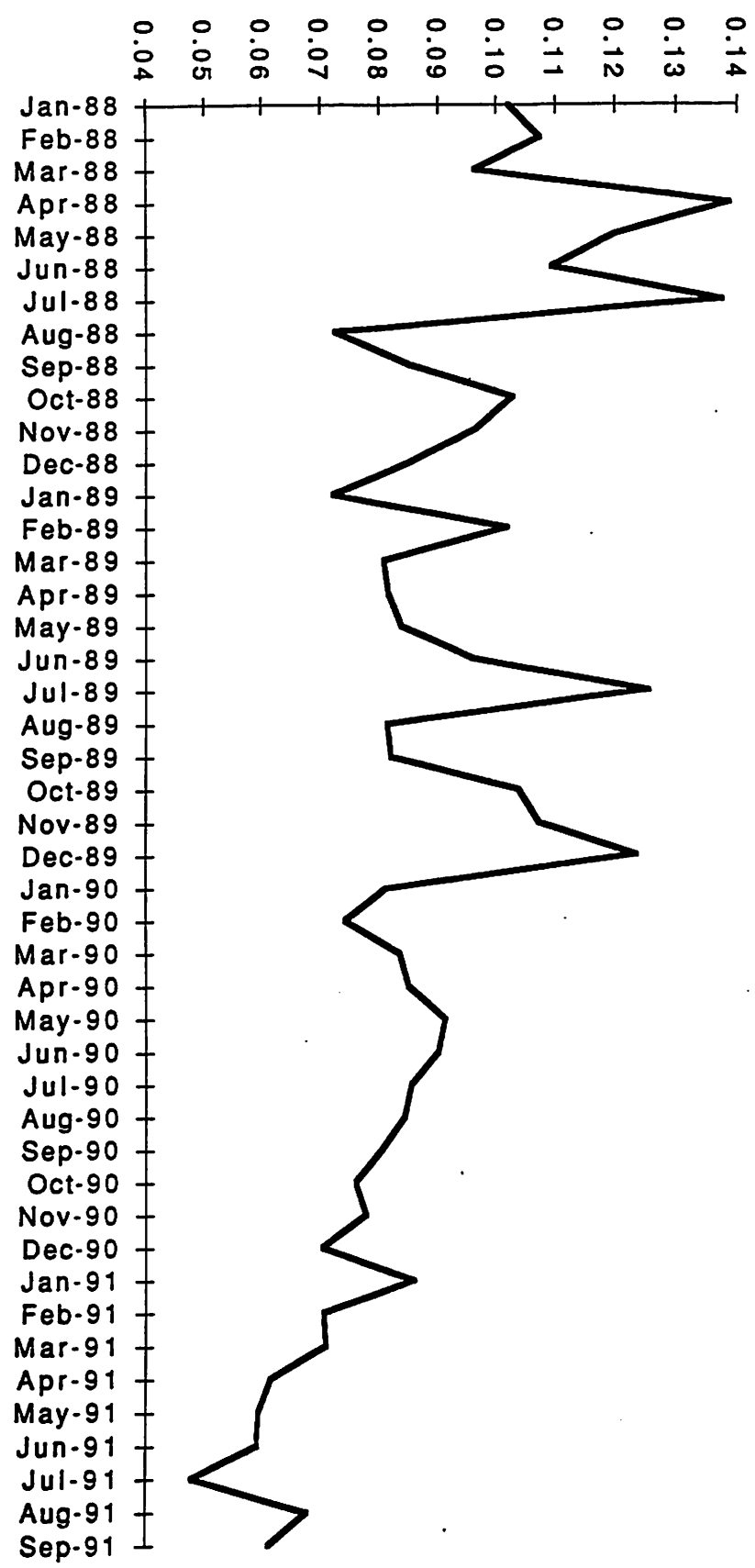


Exhibit 7 1986-1990 Catch Histories of Bering Sea/Aleutian Islands Pollock
by Catcher Vessels Delivering to Inshore/Offshore and JVP Processors.
(Source: NPFMC, June 1991, Public Submission.)

Year	DAP Inshore		DAP Offshore		JVP		Total
	mt	%	mt	%	mt	%	
1986	14,200	1.59	43,700	4.89	835,103	93.52	893,003
1987	97,985	7.75	120,985	9.57	1,044,468	82.67	1,263,438
1988	185,809	13.67	347,244	25.54	826,413	60.78	1,359,465
1989	190,723	14.83	807,232	62.76	288,352	22.42	1,286,307
1990	218,650	15.47	1,172,262	82.94	22,397	1.58	1,413,309
1986-90	707,367	11.38	2,491,423	40.08	3,016,733	48.54	6,215,522

JVP + DAP Inshore

Year	mt	%
1986	849,303	95.11
1987	1,142,453	90.42
1988	1,012,222	74.45
1989	479,075	37.25
1990	241,047	17.05
1986-90	3,724,100	59.92

JVP + Inshore DAP + 10% DAP Offshore

Year	mt	%
1986	853,673	95.60
1987	1,154,552	91.38
1988	1,046,946	77.00
1989	559,798	43.53
1990	358,273	25.34
1986-90	3,968,872	64.52

JVP + Inshore DAP + 15% DAP Offshore

Year	mt	%
1986	855,858	95.84
1987	1,160,601	91.86
1988	1,064,309	78.28
1989	600,160	46.66
1990	416,886	29.49
1986-90	4,091,258	66.81

JVP + Inshore DAP + 20% DAP Offshore

Year	mt	%
1986	858,043	96.09
1987	1,166,650	92.33
1988	1,081,671	79.56
1989	640,521	49.80
1990	475,499	33.64
1986-90	4,213,645	69.11

Exhibit 8. Harvest of pollock in Alaska by type of operation and year, 1980-1991. (Note: Mothership portion of at-sea harvest estimated by mothership vessel effort for period 1980-1990 due to lack of specific harvest information by vessel class). Source: NMFS PacFin database and OPUS database.

Eastern Bering Sea/Aleutian Islands

Year	Harvest in Metric Tons					Percent of Total DAH		
	At-Sea C/P		Shoreside	Mothership	JVP	Total Catcher DAH	Catcher	Factory Trawler
	Factory	Trawlers						
1980		0	133	0	10,652	10,785	100%	0%
1981		0	234	0	42,083	42,317	100%	0%
1982		0	155	0	54,604	54,759	100%	0%
1983		0	1,091	0	149,014	150,105	100%	0%
1984		0	7,313	0	237,008	244,321	100%	0%
1985		15,755	12,000	0	337,540	349,540	96%	4%
1986		29,113	14,200	14,587	835,103	863,890	97%	3%
1987		102,433	76,600	36,467	1,044,468	1,157,535	92%	8%
1988		310,466	150,300	72,934	826,413	1,049,647	77%	23%
1989		686,892	190,723	120,341	288,352	599,416	47%	53%
1990		1,040,981	218,650	131,281	22,397	372,328	26%	74%
1991		826,920	376,857	160,454	0	537,311	39%	61%

Gulf of Alaska

Year	Harvest in Metric Tons					Percent of Total DAH		
	At-Sea C/P		Shoreside	Mothership	JVP	Total Catcher DAH	Catcher	Factory Trawler
	Factory	Trawler						
1980		0	0	0	1,136	1,136	100%	0%
1981		0	563	0	16,857	17,420	100%	0%
1982		0	2,217	0	73,917	76,134	100%	0%
1983		0	120	0	134,131	134,251	100%	0%
1984		0	1,037	0	207,104	208,141	100%	0%
1985		7,379	8,000	0	237,860	245,860	97%	3%
1986		11,652	9,400	348	62,591	72,339	86%	14%
1987		8,804	30,300	696	22,822	53,818	86%	14%
1988		7,752	47,700	348	152	48,200	86%	14%
1989		32,816	33,405	6,264	0	39,669	55%	45%
1990		10,991	62,903	6,682	0	69,585	86%	14%
1991		17,429	71,141	5,429	0	76,570	81%	19%

Exhibit 9. Catch history of factory trawlers versus catcher trawler harvest of pollock in the eastern Bering Sea/Aleutian Islands, 1980-1991. (Note: Catcher trawler equals harvests by shoreside, joint venture and catcher vessels delivering to motherships).

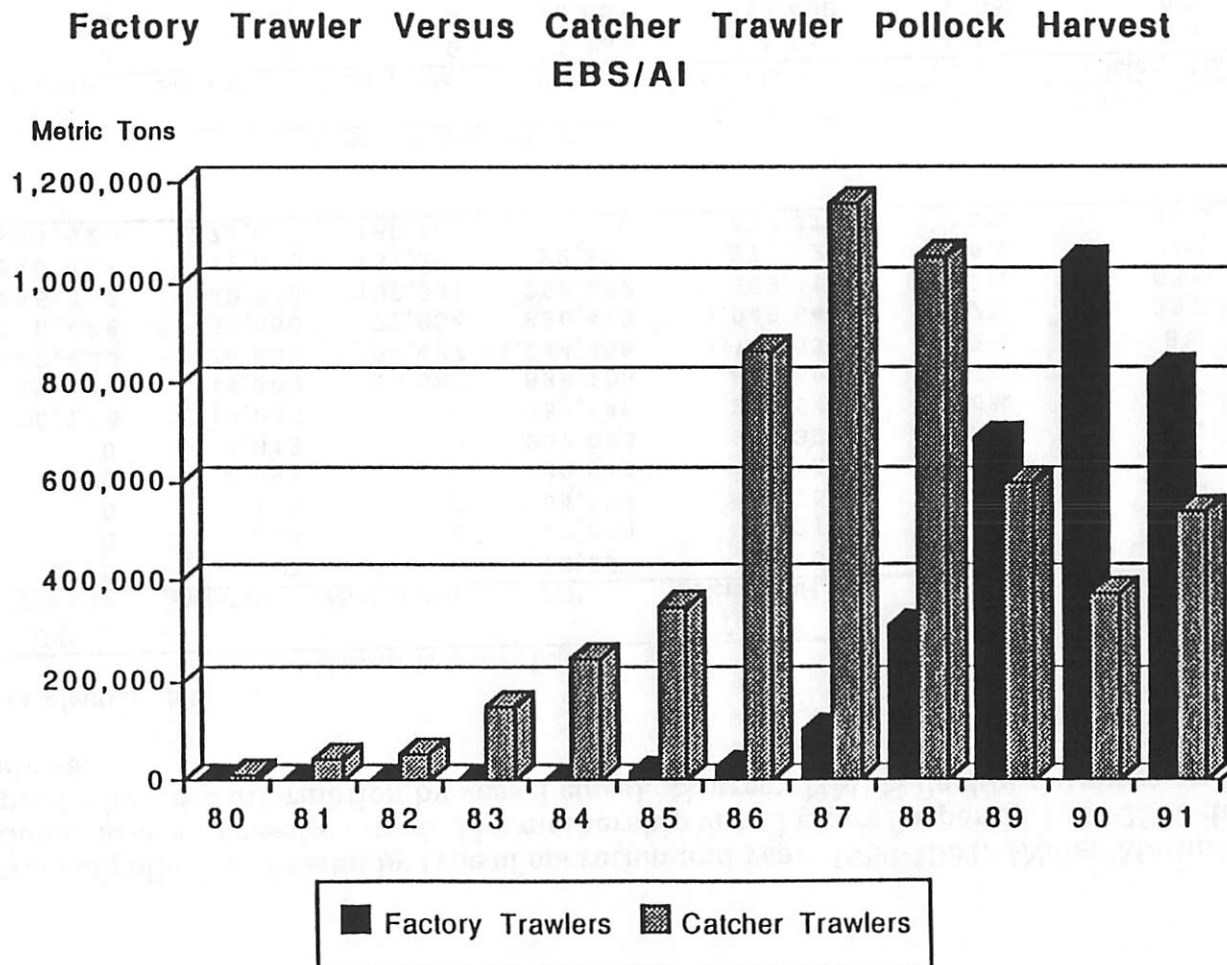
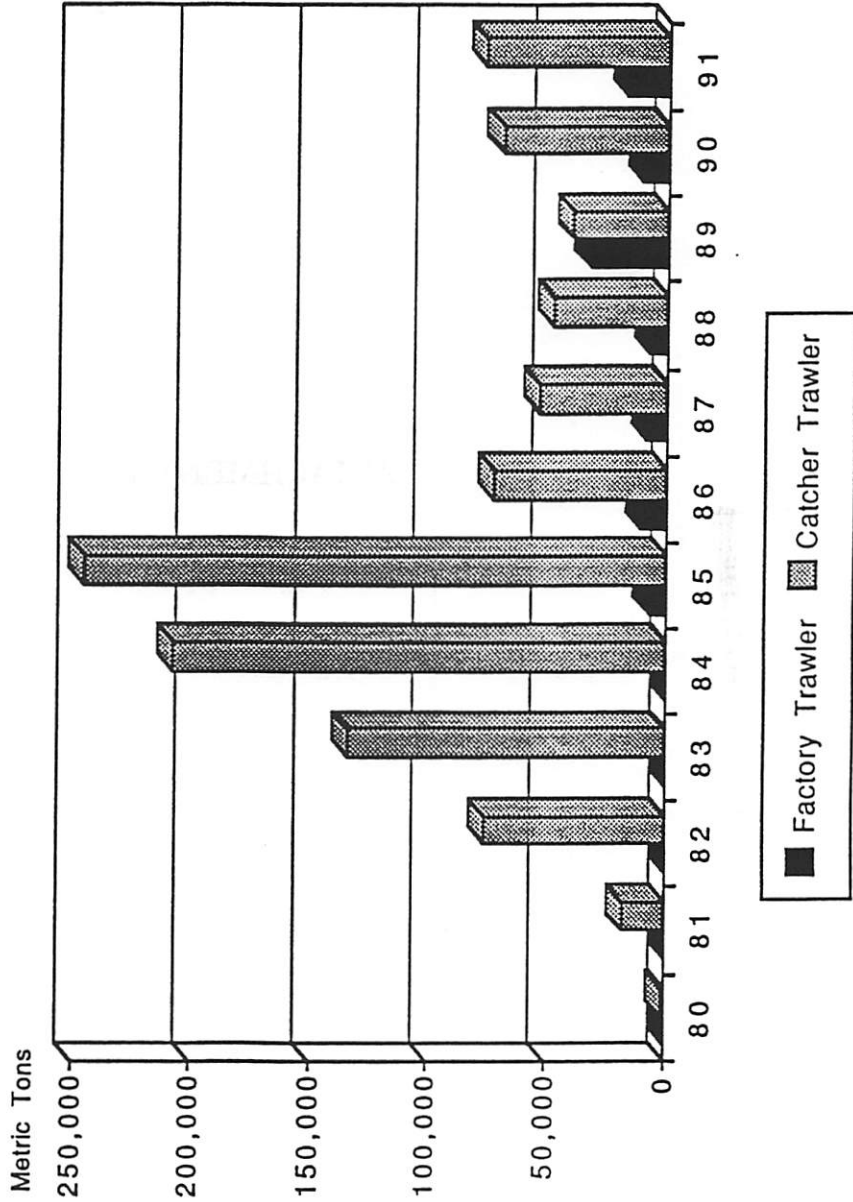


Exhibit 10. Catch history of factory trawlers versus catcher trawler harvest of pollock in the Gulf of Alaska, 1980-1991. (Note: Catcher trawler equals harvests by shoreside, joint venture and catcher vessels delivering to motherships).

**Factory Trawler versus Catcher Trawler Harvest of Pollock
Gulf of Alaska**



ATTACHMENT 1

Source: Secretary of Commerce Mosbacher, April 19, 1989, report to Congress.

Table J.—List of Alaska Groundfish Joint Venture Vessels, 1988

<u>Vessel Name</u>	<u>Length</u>	<u>Tonnage</u>	<u>Years in Fleet</u>
Alaskan Pride	85	199	3
Alaskan Star	125	131	2
Aldebaran	132	135	5
Aleutian Challenge	86	126	5
Almighty	87	99	1
Aloma	76	68	1
Alsea	125	126	2
Alyeska	125	131	7
Amalaska I	165	134	1
Amalaska II	160	334	1
Amber Dawn	91	116	5
Ambition	95	136	8
American Beauty	123	135	4
Anita J	110	135	3
Anna Marie	78	120	3
Arcturus	132	135	6
Argosy	105	135	3
Auriga	193	---	1
Barbara Lee	108	181	6
Bering I	146	109	2
Bon-Sur-Mar	90	126	3
California Horizon	90	181	7
Cape Kiwanda	76	72	2
Clear Water Heron	92	198	1
Coho	66	61	4
Collier Brothers	80	105	1
Columbia	122	198	4
Commodore	108	140	2
Dawn	86	115	6
Distant Water	106	137	2
Dona Genovena	123	148	7
Dona Liliana	165	193	1
Dona Martita	151	193	2
Dona Paulita	165	193	1
Dusk	86	99	6
Elizabeth F	91	145	5
Emerald Sea	86	71	4
Endurance	98	144	4
Excalibur	60	63	9
Excalibur II	78	81	7
Flying Cloud	124	134	4
Gold Rush	93	91	1
Golden Dawn	123	135	4
Golden Fleece	104	128	8
Golden Pisceas	81	154	6

<u>Vessel Name</u>	<u>Length</u>	<u>Tonnage</u>	<u>Years in Fl</u>
Golden Venture	85	112	4
Grand Dutchess	110	143	2
Great Pacific	135	132	7
Gun-Mar	135	132	7
Half Moon Bay	108	133	8
Hazel Lorraine	75	83	6
Hazel Lorraine	110	129	4
Hickory Wind	75	100	5
Irene's Way	78	108	1
Lady Louise	110	66	1
Lady of Good Voyage	86	126	6
Leslie Lee	119	146	2
Let's Go	119	146	2
Little Bear	90	98	6
Marcy J	97	114	1
Mar-Gun	110	130	5
Mar Pacifico	96	117	3
Margaret Lyn	98	128	8
Mark 1	88	138	4
Ms Amy	90	73	1
Miss Leona	77	93	2
Morning Star	123	128	8
Muir Milach	84	126	8
Neahkahnne	98	133	9
Nordic Fury	110	137	5
Nordic Star	108	199	3
Norpac I	166	130	1
Norpac II	162	297	1
Ocean Dynasty	125	199	7
Ocean Harvester	108	199	7
Ocean Hope 1	92	195	3
Ocean Hope 2	89	192	4
Ocean Hunter	88	109	3
Ocean Leader	103	131	5
Ocean Mariner	92	110	2
Ocean Spray	94	134	5
Oceanic	122	134	6
Oceanida One	190	238	2
Orion	86	149	4
Pacific Alliance	89	131	5
Pacific Challenger	86	111	5
Pacific Fury	110	137	6
Pacific Viking	108	137	3
Paragon II	110	133	9
Pat San Marie	101	77	5
Pegasus	67	95	4
Peggy Jo	99	134	5
Pelagos	131	126	9
Persaverance	85	124	2
Progress	100	137	6

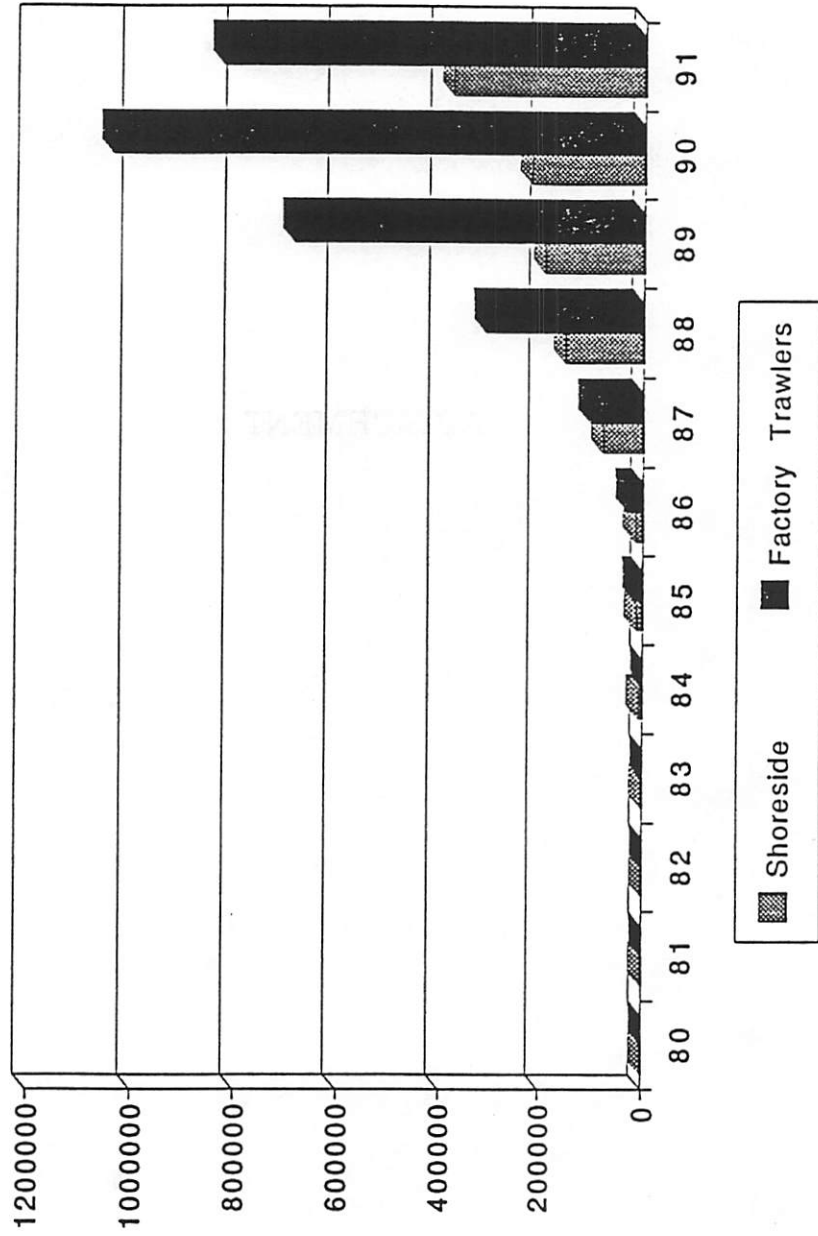
ATTACHMENT 1

<u>Vessel Name</u>	<u>Length</u>	<u>Tonnage</u>	<u>Years in Fle</u>
Queen Victoria	90	110	3
Raven	75	72	4
Rosella	94	98	7
Royal American	105	151	6
Royal Atlantic	108	139	5
Sea Dawn	---	---	2
Seeker	90	184	1
Sharon Lorraine	110	129	6
Silver Chalica	85	139	9
Silver Sea	117	197	5
Sisu	83	97	2
Sleep Robber	78	111	9
Sonny Boy	94	120	2
Star Fish	109	199	5
Starlita	122	199	3
Starward	123	199	7
Sunset Bay	108	147	7
Topaz	80	98	6
Tracy Anne	96	189	1
Tramont	133	311	2
Uyak I	173	133	1
U.S. Dominator	124	136	6
Vaerdal	124	135	2
Vanguard	86	144	8
Vega	90	108	9
Vesteraalen	125	198	6
Viking	120	138	6
Viking Explorer	123	131	5
Voyager	94	121	5
Walter N	72	83	1
Western Dawn	97	130	5
Westward One	135	125	3

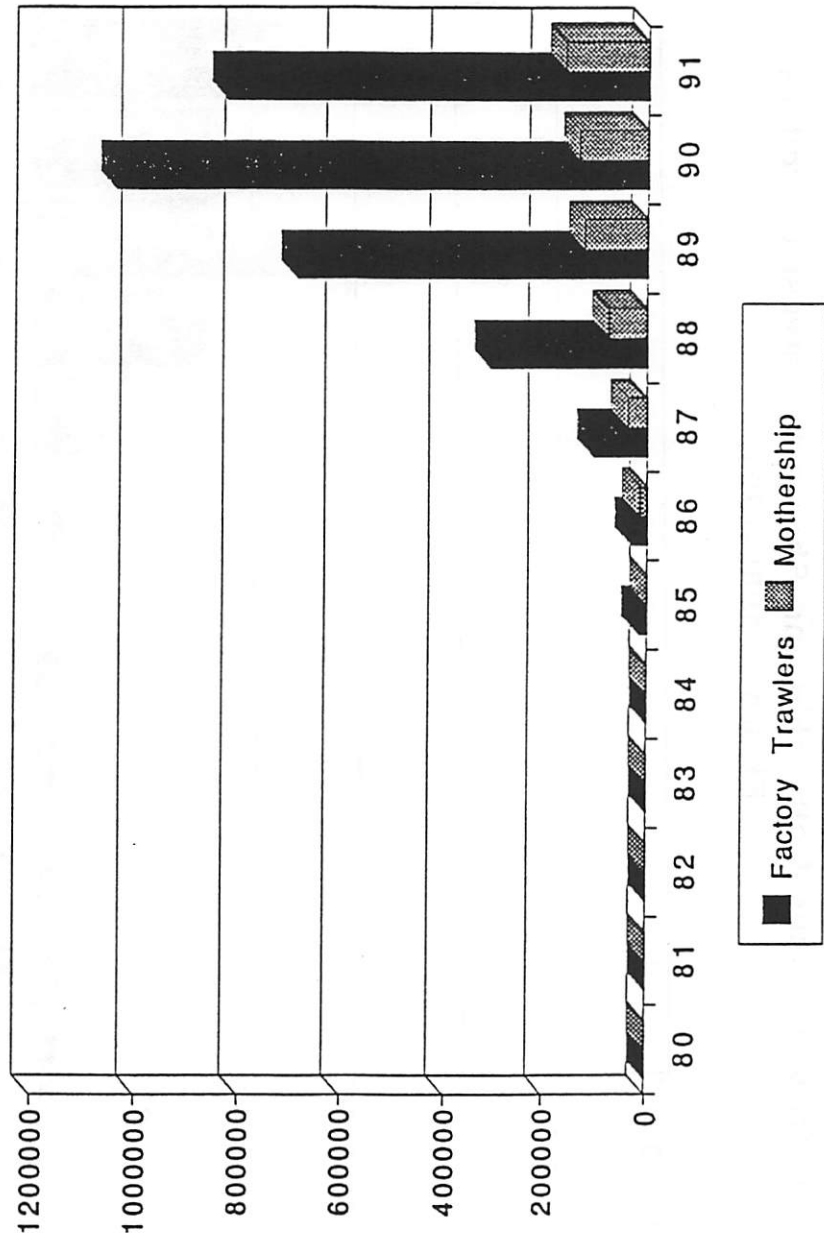
Total	128 Vessels
Ave. Length	105.8 feet
Ave. Tonnage	137.2 tons
Ave. Years in Fleet	4.3 years

ATTACHMENT 2

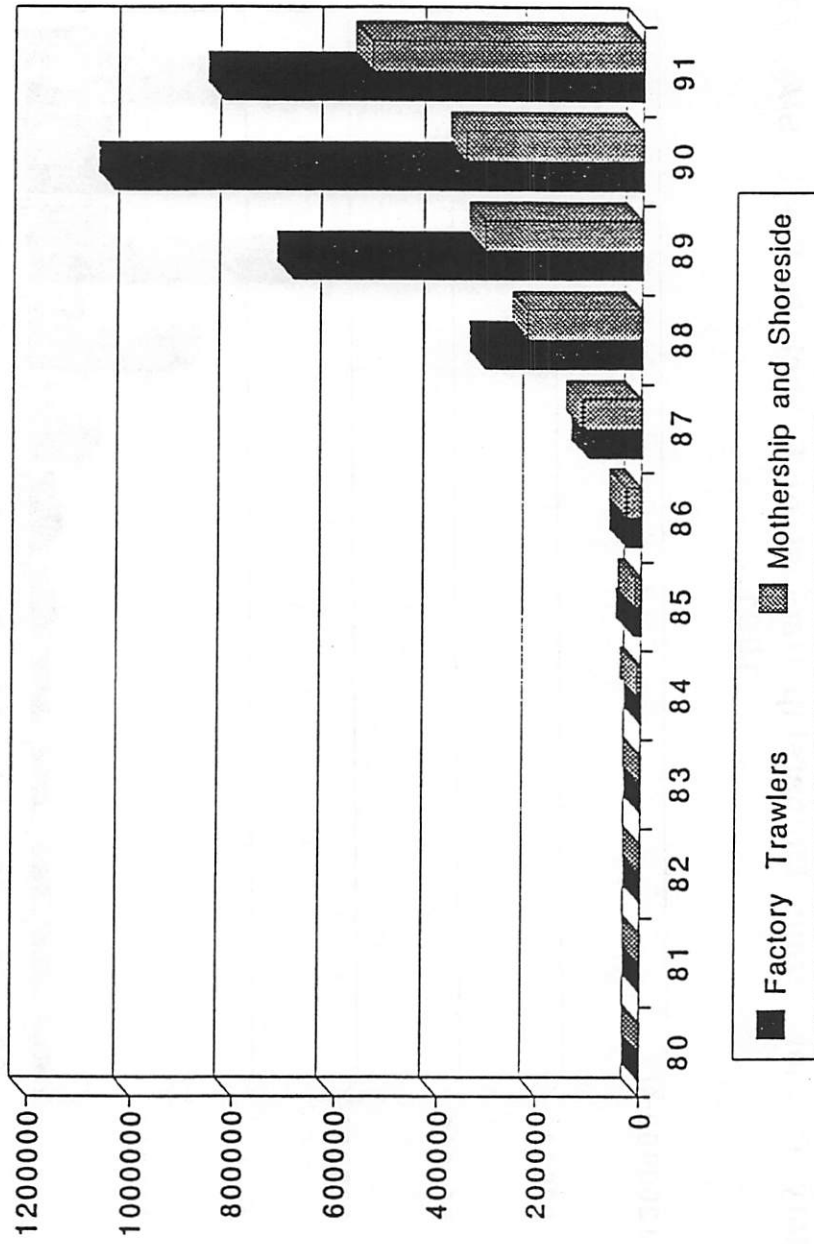
Factory Trawler versus Shoreside Harvest of Pollock in the EBS/AI, 1980-1991.



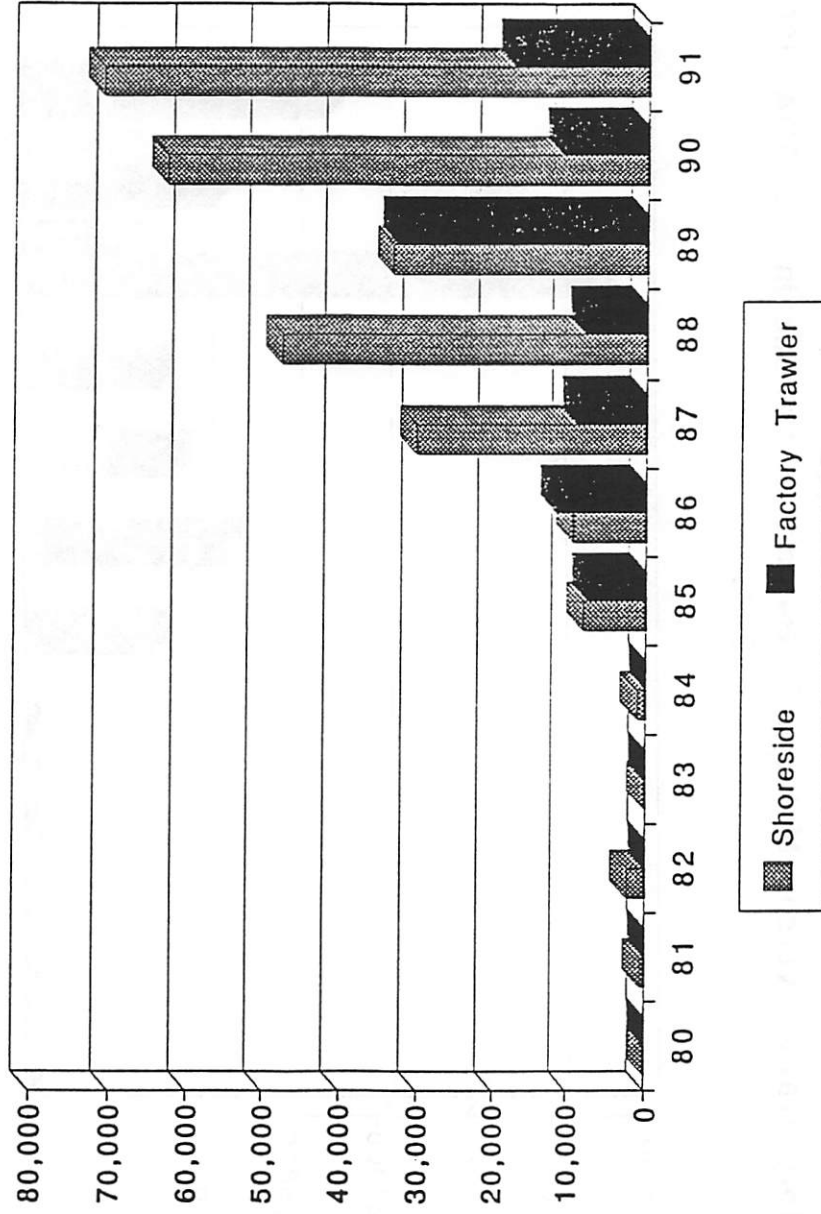
Factory Trawler versus Mothership Harvest of Pollock in the EBS/AI, 1980-1991.



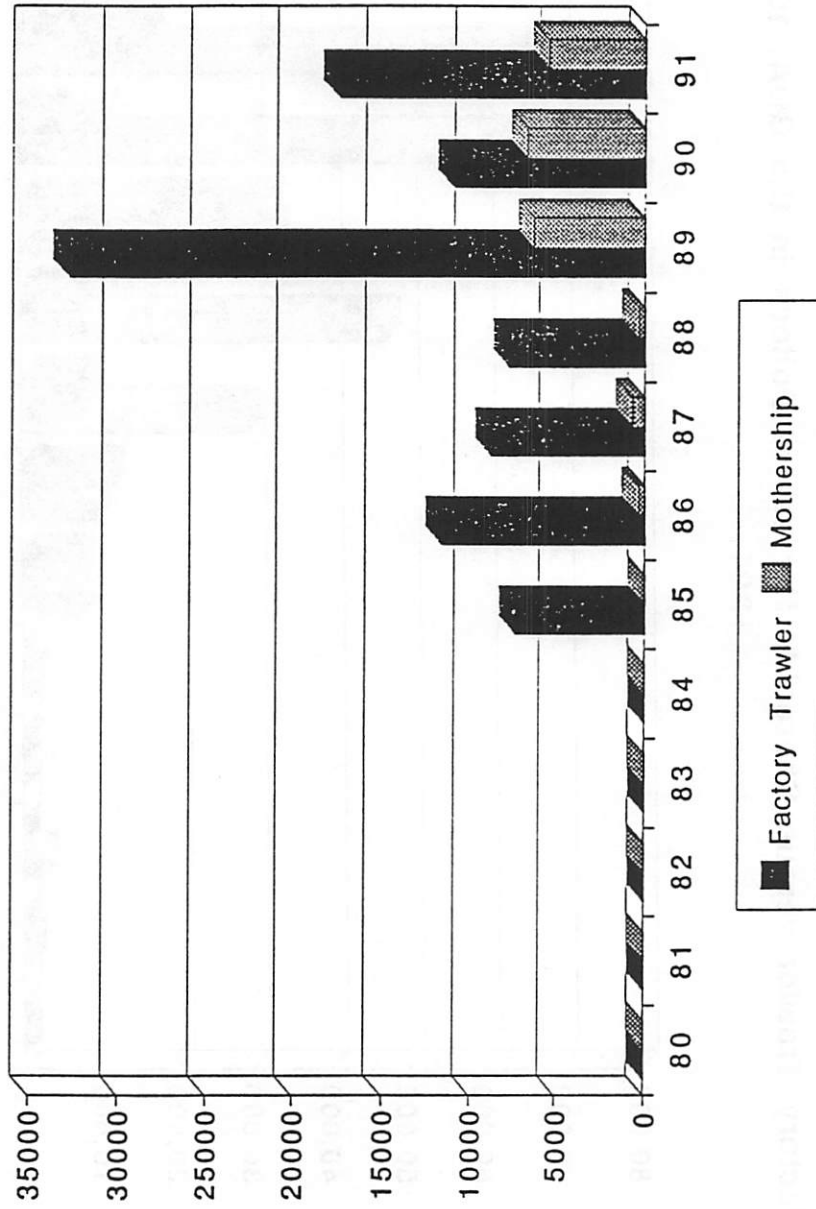
Factory Trawler versus Mothership and Shoreside Harvest of Pollock in the EBS/AI, 1980-1991.



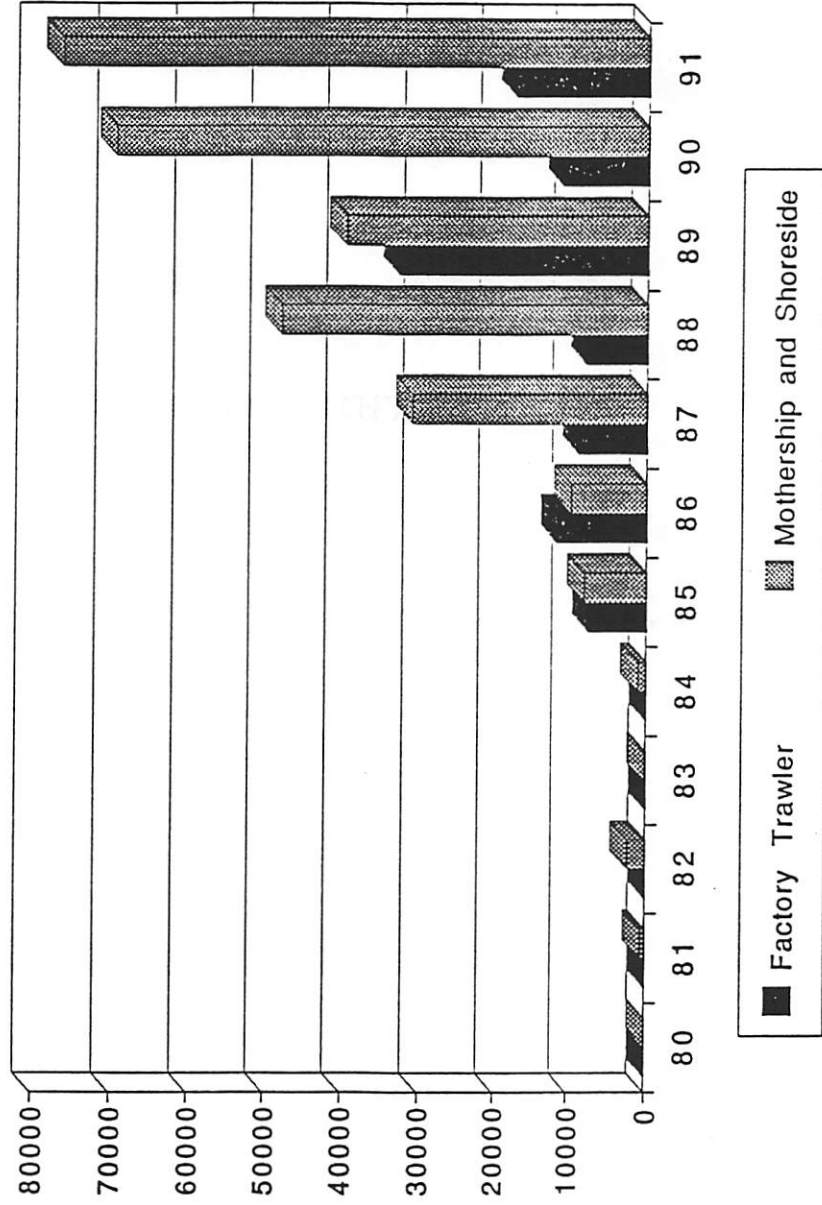
Factory Trawler versus Shoreside Harvest of Pollock in the GOA, 1980-1991.



Factory Trawler versus Mothership Harvest of Pollock in the GOA, 1980-1991.



**Factory Trawler versus Mothership and Shoreside Harvest of Pollock in the
GOA, 1980-1991.**



ATTACHMENT 3

Look Ma, No Stern Ramp

Beam me up some pollock, Scotty

by Bill Rudolph

Welcome to the bridge of the *Chelsea K*, where proud builder Joe Martinac Jr. looks a little out of place, a guy in a hardhat

standing in the middle of the Star Trek set, surrounded on three sides by blank screens, gauges and handles.

"We did a complete mockup of the pilothouse to figure out the best working configuration of all the gear." He waves his hand. "Four-station steering, two-station winch control . . ." Sure enough, there's another console near the back windows where the deck visibility is

great because this pilothouse is more than halfway to the *Chelsea K*'s stern, which, by the way, has no ramp. Look down and you notice that you're nearly standing on top of one of the trawl winches.

This is definitely an unusual configuration. It's Euro-trawling transplanted to the Bering Sea, and the *Chelsea K* has been designed from the keel up to be the ultimate shore-based RSW catcher vessel.

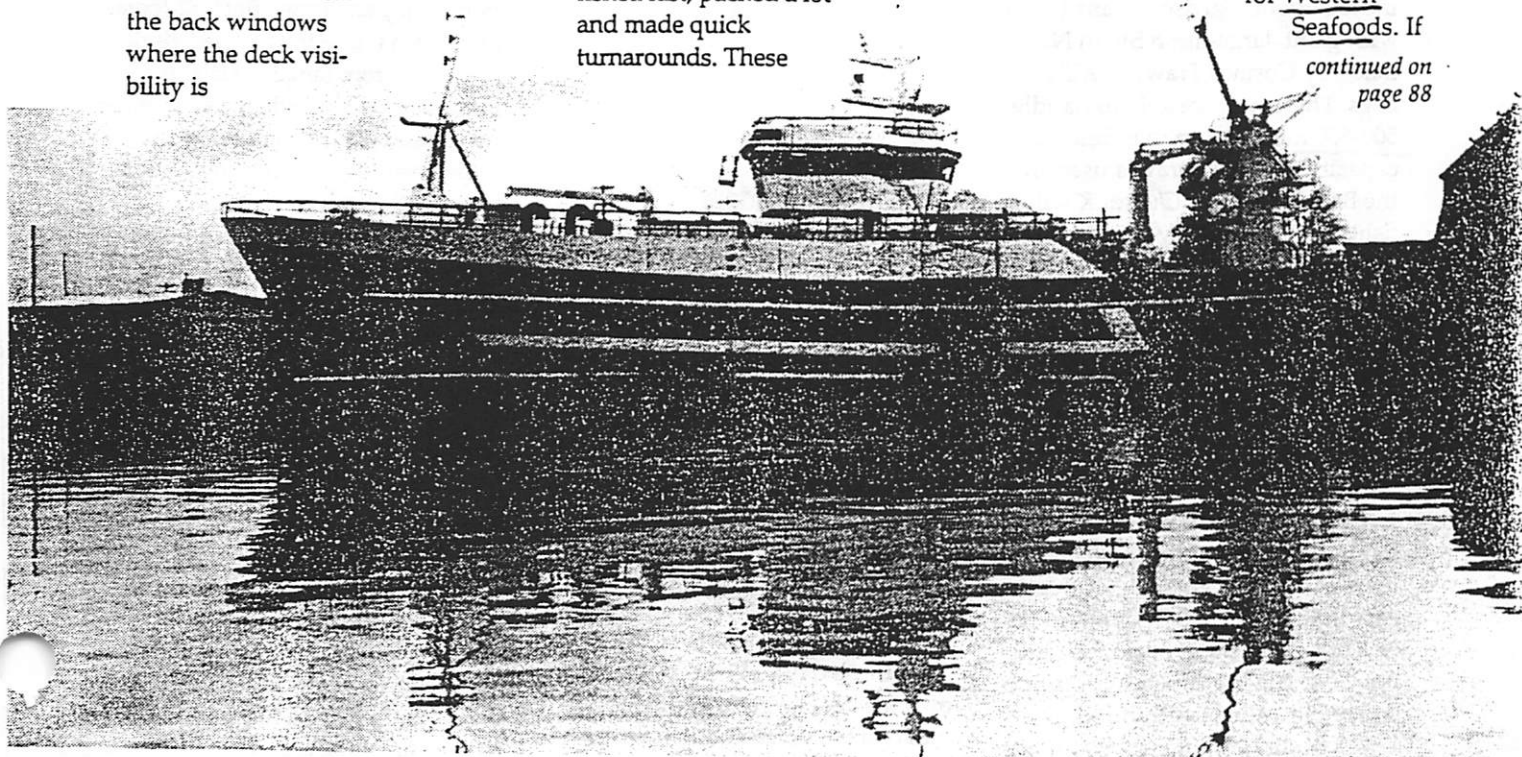
Owner/skipper Larry Garrison and his partners in DynaSea selected the Norwegian firm of Vik and Sandvik, who had designed other shore-based catchers that fished fast, packed a lot and made quick turnarounds. These

were the big mackerel trawlers that worked the Irish Sea, 250-footers that kept their catch in large RSW tanks and delivered to plants ashore.

The *Chelsea K* is a scaled-down version, 150' x 39' x 21'. She's built deep for her size for added seaworthiness. Martinac added a few touches of its own, garnered from years of experience building a fleet of world-ranging steel tuna clippers. The keel is solid steel, 16" x 20". It was fabricated in four-foot sections and weighs 65 tons!

Six RSW tanks forward of the house can pack a 600-ton payload into Dutch Harbor for Western Seafoods. If

*continued on
page 88*



The Chelsea K. (Photo by John van Amerongen.)

No Stern Ramp

continued from page 62

pollock politics change, the owners have covered their shore-based bets and made sure that there is enough deck space forward for a processing line. The RSW tanks are double-walled and heavily insulated, ready to handle frozen product if the need arises. For shore-based operations, the *Chelsea K* will fish with a crew of five or six, but there are enough staterooms to handle a crew of 15.

So without that stern ramp, just how do those fish get on deck? They will be sucked aboard by a submersible pump lowered into the bag of the net. The pump has a capacity of 300 tons an hour, and the theory is that it's a safer procedure than hauling a huge codend up a steep ramp in severe weather. Irish fishermen have already proved it by pumping 1,000-ton bags in terrible conditions. On the *Chelsea K*, a series of conveyers carry the fish to the forward deck and into the RSW tanks.

But it's down at the end of the trawl wire that the Irish influence is most evident. Garrison plans to fish with giant, large-mesh Swan Nets made by Cosmos Trawl of Killybegs. These nets are able to handle 500-600 tons, four to five times the capacity of current trawls used in the Bering Sea. The *Chelsea K* will be fishing on a three-day rotation for Western Seafoods, delivering to their new \$70 million plant in Dutch Harbor. Hugh Reilly, president of Western Seafoods and partner in the vessel, is blunt about it. "To create pollock, you need big nets and high horsepower." He expects the *Chelsea K* to deliver 700,000 lbs. each trip.

Towing power will be provided by a 4,500hp Wichman 2-cycle diesel through a Volda 4:1 reduction gear that turns a 138" Wichman controllable-pitch propeller. Electrical power to run the winch hydraulics and refrigeration is provided by a 1,600kW shaft-driven generator and

a pair of Caterpillar 3412 units rated at 500kW. A Cat 3304 @ 173kW is available for emergency backup.

Rapp-Hydema supplied the powerful codend pump (up to 300 tons/hr.) and trawl winches, 1,460 fathoms of 1-1/4" wire rope, 44-ton line pull, and the topline winch, 500 meters 3" line, with a 36-ton line pull.

Bowman refrigeration supplied the RSW (30 degrees) and dry cold storage (-25 degrees) systems which include Sullair 250hp Freon screw compressors and a Vilter 450 XL 8-cylinder reciprocating unit.

The electronics were provided by Harris Electric and according to the invitation for the launching party, "Puts Starship Enterprise to shame." There's no doubt about it, when the pollock derby starts in January, *Chelsea K* will be fishing at warp speed and all eyes will be watching her performance. According to Reilly, "Some will be looking with anger, and some with jealousy, but we consider this a very progressive investment. The fishing industry has got to keep changing or we'll go the way of the steel mills." □

Staying Independent

continued from page 63

empathize. He wasn't so sure I could really understand, so he went on about his experience.

It was tough working for the company. Two men to a boat, and everywhere they went rowing with heavy 18-foot oak oars. I acknowledged that it had to be tough, but he explained the next year they had a big technical advance, 18-foot spruce oars! That was a lot better!

In those days, a fisherman didn't own his boat or gear. The companies had the voice and influenced

the lawmakers. They wanted to limit the fisherman's independence. A rule limiting Bristol Bay boats to 32 feet kept fishermen dependent and in company lease boats for years. Many things have changed from those employee/fisherman years. I myself can remember pughing fish for a per-fish price, with the whole pack canned, and helping as well to load the cases into the belly of Alaska steamships.

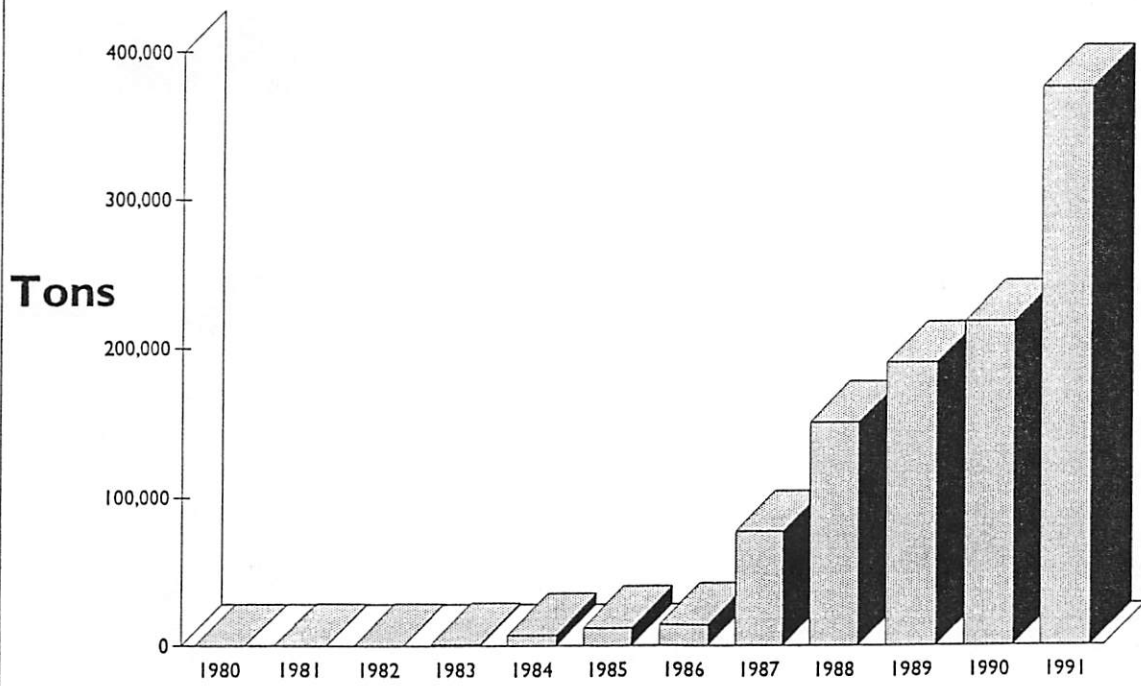
Today's independent fisherman is in a far different circumstance. There is an increasing demand for virtues that are hard to find in a 32-foot Bristol Bay boat. It is no longer appropriate for all to focus exclusively on gillnet salmon. As I write, halibut ex-vessel sell for three times our sockeye price, and even abundant grey cod, for 28 cents a pound, which is more than we get for either pinks or chums. That's not mentioning herring, and many other bottom fishes for which the Bering Sea is famous.

Yet the people on the rim of the Bering Sea have been regulated into boats which are inadequate to venture profitably into it. The world over, 40-foot boats gillnet, seine, longline, potfish, jig, and trawl. But a 32-footer just doesn't have the payload, deck space, comfort, range or stability needed, especially when you consider the greater load of equipment and safety gear they are carrying, and the weather they have to fish in.

It is interesting that during the very days that the call was made to declare the Bristol Bay region an economic disaster (and it is), an intense fishery of large profit was taking place between capes Newenham and Constantine. I don't know of any local participation in it. If only half a dozen boats from the fishing communities of southwest Alaska were active three months, each side of the sockeye season, it would be a great increase in local revenue.

The 32-foot boat limit in Bristol Bay is at this time a hindrance to the fishermen of the region.

Pollock Deliveries to Bering Sea Shore Plants



1980-1991

Source: NMFS PacFin Database and OPUS Database

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STATE OF ALASKA
OFFICE OF THE GOVERNOR
JUNEAU

RECEIVED AUG 4 1992

July 31, 1992

Richard B. Lauber, Chairman
North Pacific Fishery
Management Council
605 West Fourth Avenue
Anchorage, AK 99501

Dear Chairman Lauber:

I am writing in support of the proposed inshore/offshore pollock allocation contained in Amendment 18 to the Bering Sea/Aleutian Island Groundfish Management Plan. I strongly urge the Council to pass the amendment at the August meeting and forward it to the Secretary as quickly as possible.

On March 4, 1992, Under Secretary of Commerce, Dr. John Knauss, partially disapproved Amendment 18, directing the Council to reevaluate the allocation for the years of 1993 through 1995. I believe that the allocation scheme which would be established under the amendment is in keeping with the Magnuson Fishery Conservation and Management Act, and is in the best interests of the nation and our fishing industry.

The purpose of creating the 200-mile fishery zones worldwide was to provide nations, peoples, and communities immediately adjacent to fishery resources the ability to protect and benefit from those resources. Protecting our coastal fisheries from the impacts of a large distant water fleet of foreign vessels operating off our shores was the driving force behind the passage of the Magnuson Act.

No other country in the world has constructed a distant water fleet to harvest its own inshore resources to the detriment of its existing fleet and dependent coastal communities. Now that the U.S. has constructed such a fleet, an inshore allocation is imperative to protect our coastal fisheries, our coastal communities, and to fulfill the promise of the Magnuson Act.

Mr. Richard B. Lauber

July 31, 1992

Page 2

I have attached for your consideration a report prepared for me which provides supplemental information regarding the inshore/offshore allocation. I believe that the information in the report provides vital insights into the importance of this allocation to our coastal communities and to the nation.

Once again, thank you for the hard work of the Council in managing and conserving the groundfish resources off Alaska.

With best regards.

Sincerely,

A handwritten signature in black ink, reading "Walter J. Hickel". The signature is written in a cursive style with a large, prominent "W" and "H".

Walter J. Hickel
Governor

cc: Commissioner Carl Rosier

**SUPPLEMENTAL INFORMATION
ON AMENDMENT 18**

Bering Sea/Aleutian Islands Fishery Management Plan
North Pacific Fishery Management Council

Prepared for the State of Alaska

by

Paul F. Peyton

Fisheries Consulting and Marketing

July 31, 1992

Editor's Note:

This report was prepared with the assistance and cooperation of the following agencies:

- 1. Alaska Department of Commerce and Economic Development**
- 2. Alaska Department of Community and Regional Affairs**
- 3. Alaska Department of Fish and Game**
- 4. Alaska Department of Health and Social Services**
- 5. Alaska Department of Labor**
- 6. Alaska Department of Public Safety**
- 7. University of Alaska**
 - Institute of Social and Economic Research**
 - Alaska Center for International Business**

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Introduction

"[A]n overcapitalized at-sea processing fleet jeopardizes the overall health of our fisheries and spells economic disaster to our coastal fishing industries and the communities they support."

*Congresswoman Jolene Unsoeld, Washington State
March 10, 1992¹*

On March 4, 1992 Undersecretary of Commerce John Knauss partially approved Amendment 18 to the Bering Sea/Aleutian Islands Groundfish Management Plan. The amendment would have allocated the Bering Sea/Aleutian Islands pollock resource between the inshore and offshore sectors of the seafood industry. The allocation was intended to prevent preemption of the fishery by one sector of the industry over another, and to protect the economies of adjacent coastal communities from loss of access to Bering Sea/Aleutian Islands fishery resources. The Secretary directed the North Pacific Fishery Management Council to reconsider that portion of Amendment 18 affecting allocation for the years 1993 — 1995.

The analysis that formed the basis for the Undersecretary's decision relies on corporate profitability as the primary measure of economic efficiency rather than the broader national goals established in the Magnuson Fishery Conservation and Management Act. It is the state's position that the Council and the Secretary must balance community stability, distributive equity, and social concerns along with economic efficiency as was intended by the framers of the MFCMA.

The Secretary and the Council should be aware that no other country in the world has allowed the construction of a new distant water fleet to be used to harvest its own coastal resources to the detriment of its existing fleet and coastal communities. To allow the offshore component to stifle and smother the development of social and economic stability in coastal communities directly adjacent to the fishery resources was not the intent or the vision of the framers of the Magnuson Fishery Conservation and Management Act.

¹Letter to U.S. Secretary of Commerce, Barbara Franklin, in support of the Pacific whiting plan adopted by the Pacific Fishery Management Council to allocate whiting between inshore and offshore components of the industry.

The Secretary and the Council are obligated to consider the national interest. That interest takes into account many factors other than the level of profit generated by the users of a public resource obtained at no cost. Economic efficiency of a natural resource is far more than profits. It is wise use of that resource. It is social stability and the impact upon a family and a community. It is concern for the health of the resource and the future.

There are several factors that contribute to the perceived economic efficiency of the offshore fleet that are contrary to the national interest. These are the massive volumes of "economic discards," the huge discharges of untreated processing waste, the lack of worker health and safety enforcement, the exemption from having to pay a minimum wage, and the fact that the offshore fleet pay virtually no taxes. In sum, these allow the offshore fleet to operate outside the requirements other businesses comply with on a day to day basis as a normal course of business. This is an enormous hidden subsidy which is, to a large extent, contrary to the public interest.

MAGNUSON ACT PURPOSES AND GOALS

The purpose of creating the 200 mile fishery zones worldwide was to provide nations, people, and communities immediately adjacent to fishery resources the ability to protect and benefit from those resources. Protecting our coastal fisheries from the impacts of a large distant water fleet of foreign vessels operating off our shore was the driving force behind the passage of the Magnuson Act. The findings of the Magnuson Act speak directly to the "damage massive foreign fleets fishing in (adjacent) waters" have wrought on the economies of coastal communities. Concern for the well-being of the nation's coastal communities and fishing industry is reinforced by both the House and Senate reports filed at the original passage of the Act.

The House and Senate reports on the original passage of the Magnuson Act provide the following:

The Congress further finds and declares that commercial and recreational fishing constitutes a major source of enjoyment and contributes significantly to the economy of the nation. Many coastal areas are dependent on fishing and related activities, and their economies have been badly damaged by overfishing of fishery resources. (Senate Report 94-416)

Commercial fisheries traditionally have been an important source of income and employment in coastal areas of the United States.. (House of Representatives Report 94-445)

The recent decision handed down on the lawsuit challenging Amendment 18 reaffirms this basic premise, stating:

Support for coastal fishermen is one of the purposes of the Magnuson Act. "[M]any coastal areas are dependent upon fishing and related activities, and their economies have been badly damaged by overfishing of fishery resources at an ever-increasing rate over the past decade."

...Pursuant to the Act, fishery management plans are to "take into account the social and economic needs of the states." In developing an allocation of fishing privileges, regional councils are to consider the "economic and social consequences of the scheme, food production, consumer interest, dependence on the fishery by present participants and coastal communities...."

The state has long recognized that the offshore fleet has a right to participate in the EEZ fisheries. But, this does not mean that the offshore fleet, with its huge over-capitalization, has the right to exclude or so dominate the fishery that the inshore fleet cannot survive. Nor does it mean the inshore sector should be penalized for failing to over-capitalize as rapidly and to the same extent as the offshore sector.

The explosive growth in the offshore sector was aided and abetted by a combination of federal policies and foreign subsidies. On the federal side, the availability of the fishing vessel capital construction fund, vessel loan guarantees from the U.S. Department of Commerce, and liberal interpretations of the Anti-Reflagging Act by the Coast Guard, encouraged massive over-capitalization of the offshore fleet. At the same time, the government of Norway offered huge shipyard subsidies and the Christiana Bank brokered deals for the construction of factory trawlers that could somehow be construed as U.S. bottoms.

Unless the preemption threat posed by the offshore fleet is reduced or eliminated through an allocation, most of the benefits to adjacent coastal communities from Americanization of the 200 mile zone off our shores will be eliminated. Surely, Congress did not intend to merely replace the foreign distant water fleet with an American flag distant water fleet which still causes the same problems of preemption, waste of the resource, and disruption of the economies of coastal communities.

The Council and the Secretary must take action to ensure that a U.S. distant water fleet overbuilt through foreign shipyard subsidies and tax breaks doesn't simply replace the foreign fleets of old. In this particular instance, "economic efficiency" measured after major infusions of tax free and foreign subsidized hardware would be a poor substitute for rational policy based on the original intent of the MFCMA.

NATIONAL BENEFITS OF AN INSHORE ALLOCATION

Managing the nation's fisheries to promote community stability is specifically identified in the MFCMA as a national goal. Alaskan coastal communities are far more dependent on these fish supplies than other communities that would be affected by this action. Failure to halt preemption impacts to the coastal communities would cause significant dislocation and depopulation. The impacts on local revenues and state aid programs would likewise be significant.

The effects of the king crab crash in the early '80's provide a useful comparison. The resident population of Unalaska/Dutch Harbor shrank significantly, as did local revenues. These communities have recovered from these economic and social downturns with the Americanization of the Bering Sea groundfish fishery and the capital investment in the inshore pollock processing sector. However, Unalaska/Dutch Harbor and Akutan will be severely affected unless the Council recommends, and the Secretary approves, an inshore allocation. The Pribilofs are likely to fail in their attempts to develop a fisheries based economy.

GENERATING REVENUE IS A NATIONAL BENEFIT

The inshore sector pays significant taxes on fish harvested. This is virtually the only tax revenue generated directly from fish harvested in the Alaska EEZ. They pay raw fish taxes to the state, city and borough, as well as sales tax, property tax and a state corporate income tax. These revenues support services and infrastructure used and relied upon by the entire industry, whether inshore or offshore. Though the offshore component utilizes shoreside facilities to stage their operations, they buy little in Alaska other than fuel. Their shoreside investment is limited and they pay virtually no state tax; as a result, the offshore component contributes very little to supporting the public services that they rely upon. The state has no taxing jurisdiction in federal waters, and is therefore unable to impose an equitable tax load on all users. This places an unfair burden on Alaska's inshore industry, coastal communities, and state government services.

Most of the offshore fleet is homeported in Washington State. Since Washington State generally does not tax product landed in processed form (unless it is processed and consumed instate), and since there is no federal fee for fish caught in the EEZ, the offshore fleet pays virtually no taxes anywhere on the fish that they harvest.

Preemption and significant reductions in inshore landings would seriously damage the revenue base of the local communities and affect the ability of the state to deal with the problems. Unfortunately, preemption would not lessen the impact of the offshore fleet on the coastal communities.

It is clearly in the national interest that the public be compensated for the effects of economic activity. This is particularly true when a public resource is extracted for private gain. Only the state of Alaska and the Alaskan coastal communities are even attempting to extract some resource rent from the harvest of this public resource. Efforts at the Federal level have not even recovered management costs.

FULL UTILIZATION OF THE RESOURCE IS IN THE NATIONAL INTEREST

The nation has a vested interest in seeing that national public resources are properly utilized. This includes the recovery of processing wastes and the minimization of discard waste. The state believes that waste imposes a hidden and uncounted cost on the public, and that this cost cannot be discounted as unimportant to the nation or irrelevant to this allocation issue.

Table 2.3 of the Supplemental SEIS reflects the product mix that would result from using these fish. Using those product mix percentages (including ancillary products), the NMFS scenario product recovery rates, and NMFS mode product prices, the offshore sector unnecessarily discarded \$ 34,986,740 worth of finished pollock products (see Table 5).² This is a direct loss to the nation.

The SEIS discusses marine pollution only in the context of shore plants. Those facilities are now processing nearly all wastes to meal and oil. The offshore fleet continues to dump huge volumes of dead fish and processing waste overboard, much of it in relatively concentrated areas north of Unimak Pass. According to the SEIS, the offshore fleet discarded 208,608,400 lbs. (94,822 mt) of pollock during the directed pollock fishery in 1991. Given the problems with NMFS data acquisition and reporting, this is probably a significant underestimate of the discards which are actually taking place.

The impacts of discards and dumped processing waste are not as readily observable at sea as they are on shore or in a bay, but "grounds souring" and the loss of valuable bottom habitat is known to be occurring. For example, in 1989 smothered, dead scallop beds were reported on the north side of Unimak Island, and reports of trawls hauling up large amounts of decaying carcasses are not unusual. In fact, NMFS has even established a fishery reporting code for vessels to account for these "previously harvested" resources.

Conservation and management of our common property groundfish resource must include a broader discussion of discards, waste and the concept of wise use. The general public in Alaska understands this relationship very clearly since the state will fine and imprison individuals who engage in the wanton waste of harvested fish and game resources. Wanton waste as practiced by the offshore fleet simply should not be tolerated as a matter of national public policy and would not be tolerated if the activity was occurring in state waters.

² SEIS Tables 2.3 and 2.5.

The playing field is further tilted in terms of regulatory burden. Shoreside processing plants are subject to monthly or more frequent inspection for a wide variety of worker safety and environmental laws. Due to their inaccessibility, the offshore fleet receives considerably less scrutiny. In fact, the factory trawler fleet maintains it is not subject to OSHA, federal wage and hour provisions, including minimum wage requirements, or even stability and load line requirements. The consequences can be tragic, as in the case of the F/T Aleutian Enterprise sinking where many lives were lost.

The national public interest is not served by allowing a relatively unregulated fleet to prosper while the shore plants, which must play by many more rules, with consequent costs, are preempted from access to a reasonable amount of fish. While relatively unregulated operations may be more "economically efficient" based on corporate profitability, the consequences are clearly not in the national interest.

CONCLUSION

The purpose of the Magnuson Act is to conserve and manage the nation's seafood resources and to return ecological, social, and economic benefits to its citizens. The Magnuson Act specifically speaks to the issues of maintaining diversity in our fisheries, stability for dependent coastal communities, and the needs of the states. Broad national public policy goals, as established in the Act, must not be overridden by a mere executive order which attempts to make narrowly defined economic efficiency the primary measure of national benefit.

Chapter 1

Role of the Inshore Fisheries in Bering Sea Communities

BERING SEA/ALEUTIAN ISLANDS COMMUNITIES ARE EXTREMELY DEPENDENT ON THE POLLOCK RESOURCES UNDER CONSIDERATION

For communities located in the Bering Sea/Aleutian Islands there are *no* economic alternatives to the seafood industry. The original social impact statement correctly recognized that negative economic impacts that may result from an inshore/offshore allocation would be easily absorbed in Puget Sound. But it did not provide adequate perspective on the economies Puget Sound and coastal Alaska. This has not been corrected in the supplemental SEIS.

The *only* economic sectors of any significance in the BS/AI of Alaska are seafood and government. Nearly all the remaining direct employment is in service to these sectors. The vast majority of seafood employment is associated with the inshore segment, as are the associated indirect and induced outputs.

Seafood harvesting and processing currently accounts for 49% of the total direct employment and income in the Aleutian Islands census region, and 65% of direct private sector employment. Obviously, groundfish is not the only seafood generating employment, but the dependence of the region's economy on groundfish is dramatic. Further, without a healthy pollock industry, the foundation of the regional processing sector will be removed, thereby reducing the capability of the industry to meet the needs of other fisheries. Compared to the economies of Ballard, Bellingham, and the state of Washington, Alaska coastal communities are exceptionally vulnerable.

Seafood processing is five times as important to the Aleutians as aircraft manufacturing is to the greater Seattle area (King and Snohomish Counties). If Seattle were as dependent on seafood processing as the Aleutians, nearly 555,500 people would be directly employed; *this is equivalent to five times the aircraft industry's total Washington State employment!* By comparison, even if all of the offshore component's employees lived in the greater Seattle area, which they don't, they would still represent 0.3% of total direct employment.³

The social impact statement was not able to document significant economic dependence in Bellingham or Ballard on the factory trawl fleet because the economies of these communities are large and well integrated into the overall Puget Sound economy: many options and opportunities exist for their residents

³Figures are from "Economic Impacts of the US North Pacific Factory Trawler Fleet", A. T. Kearney, June 1991, and Washington Dept. of Labor figures as reported by Jeff Hadland, Research and Analysis Section, Alaska Dept. of Labor, personal communication.

and local businesses. That is in marked contrast with the affected Alaskan communities. There are few, if any, places in the United States as isolated, let alone as dependent on a single industry, as coastal Alaska.

INDIRECT AND INDUCED EFFECTS

The indirect and induced economic benefits to Alaska coastal communities of the inshore sector are much higher than for the offshore sector. This is because nearly all the product, and a considerable portion of the goods and services used in producing that product, must move through the communities in which the plants are located. The offshore fleet is much more likely to ship products and supplies via tramper, do maintenance and repair work in Seattle, and hire out of Seattle than the inshore processors.

For example, A. T. Kearney reports that the factory trawl fleet directly employed an annual average of 259 full-time equivalents (FTE) in Alaska (7.4% of total factory trawl employment) and 3,206 FTE's in Washington, based on utilizing 1990 harvest levels.⁴ The report goes on to estimate indirect and induced effects in the economy of Alaska. A similar analysis of expenditures was performed for the inshore groundfish processors by Natural Resources Consultants.⁵

If the methodology of these two studies is comparable, the indirect and induced effects in Alaska (outside of fuel and fish purchases) are significantly more for the shorebased component per ton of groundfish (Table 1). Fuel and fish purchases are excluded from this discussion as both have a high non-resident components, though some 10-20% of a fishing vessel's gross is likely to stay in state, while the indirect and induced effects are probably much lower from fuel purchases. *The indirect and induced output to the state's economy per ton of fish harvested is nearly three times as great for inshore processed product.*

INSHORE POLLOCK PROCESSING EMPLOYMENT AT RISK

The potential impact to the inshore sector from preemption is nothing less than complete elimination of inshore pollock processing. Every major fishing nation in the world recognizes the danger of allowing a distant water fleet to operate inshore without specific restrictions on their harvest. This is not because factory trawlers are more efficient — it is because the fish are free, and operating constraints such as environmental and public safety regulations are minimal.

⁴Ibid, Pg. 5-13.

⁵"The Inshore Seafood Processing Industry: Estimated Economic Impacts on the Economies of Alaska and Washington", Natural Resources Consultants, 1990.

This allows the offshore sector to lower their *private* costs of production.⁶ This reduction in private costs comes at the expense of the public and the nation.

**Table 1
Indirect and Induced Impacts**

<u>Item</u>	<u>Onshore</u>		<u>Offshore</u>	
	Total mt 442,000	Per Ton x 1,000	Total mt 1,840,000	Per Ton x 1,000
Total Alaska Output	\$101,473	\$230	\$81,647	\$44
Less Fuel	\$206		\$47,847	
Less Fish	\$79,000	\$179		
Less Depreciation	\$2,073			
Net	\$20,400	\$46	\$33,800	\$18
Goods	\$350	\$1	\$782	\$0
Ice, additives	\$19	\$0		
Packaging	\$236	\$1		
Groceries, Sundries	\$22	\$0	\$782	\$0
Spare Parts	\$73	\$0		
Services	\$20,050	\$45	\$33,017	\$18
Payroll	\$11,498	\$26	\$2,955	\$2
Handling, Storage	\$958	\$2	\$7,232	\$4
Travel, Transport	\$4,456	\$10	\$5,401	\$3
Electricity	\$1,421	\$3		
Maint, Repair	\$1,340	\$3	\$4,314	\$2
Insurance	\$64	\$0		
Misc	\$313	\$1	\$13,115	\$7

⁶Riley, Christopher, "Economic Review of the Proposed Inshore/Offshore Pollock Allocation in the North Pacific", March 1991, and Kochin, Lewis, "A Cost/Benefit Analysis of the Proposed Bering Sea Pollock Allocation", July 1992.

COMPARISON: IMPACT OF LOSING 1,500 JOBS IN SEATTLE AND UNALASKA/DUTCH HARBOR

The difference in significance between the loss of the fifteen hundred jobs estimated to be at risk in the Aleutians is dramatic compared to the greater Seattle economy (King and Snohomish Counties) to a fifteen hundred job loss. In 1991, there were an average of 6,337 jobs in the entire Aleutians area. They break down as follows:

	<u>Number</u>	<u>Percent of Total</u>
Government	1,572	25%
Seafood Processing	3,104	49%
Other	1,661	26%

Seafood processing work alone accounts for 49% of total direct employment in the Aleutians region and 65% of total private sector employment. In addition, most of the remaining 1,661 direct private sector jobs are service related, and are heavily dependent upon the inshore component of the seafood industry. If the inshore component is preempted from the pollock resource, approximately 1,500 jobs would be lost in the Aleutians.⁷ This would reduce the total employment base by 24%.

The Aleutians' dependence is quite clear when the total and seafood employment are compared with landings (Table 2). When landings of king crab declined in the early '80's, processing and employment dropped drastically (Figure 1). The situation turned around dramatically with the construction of the first surimi plants. Greatland started operation in 1986. Since then, employment and earnings have shot past the king crab levels as Alyeska and Trident's Akutan plant came on line and expanded. Total processing employment is now over twice the previous high.

That these 1,500 jobs are directly dependent on pollock is evidenced by Figure 2. Employment was fairly steady through 1990, as pollock lasted most of the year. Large increases in employment accompanied the expansions in capacity in 1991. Even though a major amount of opillio was being processed through June, dramatic dips in employment and earnings follow the "A" and "B" seasons in 1991. A major increase in employment May — July occurs as the "B" season starts. A dramatic drop also occurs in October prior to the opening of the crab season.

⁷This is because under the Olympic System factory trawlers have a lower ratio of costs to benefits than inshore operations. As overcapitalization increases the costs for both sectors by shortening the season, costs will rise to the level where inshore operations will not be viable and cease, but the offshore fleet will still be profitable to operate. Riley, Christopher, "Economic Review of the Proposed Inshore/Offshore Pollock Allocation in the North Pacific", March 1991.

The employment base in the greater Seattle area is over one million jobs. For Seattle, a similar impact would be the loss of 250,000 jobs. Aircraft manufacturing employment in Seattle was 113,700 in 1991 (10.2% of total King County employment). (See Figure 3.)

Table 2
Volume and Value of Seafood
Landed at Dutch Harbor, 1977-1986

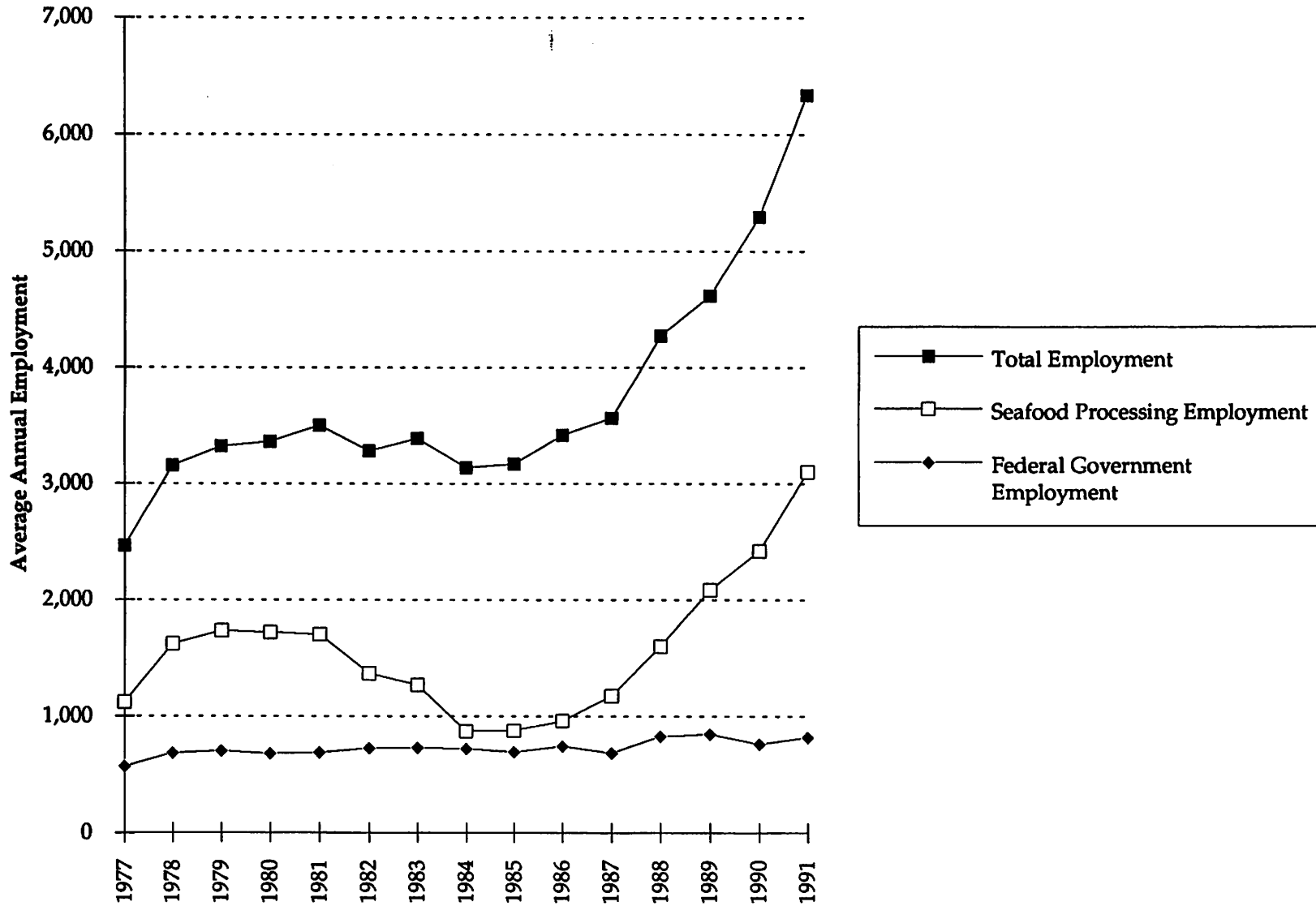
Year	Volume (millions of pounds)	Value (million of dollars)	Average Value (\$/lb)	Average* Processing Employment
1977	100.5	61.4	0.61	785
1978	125.8	99.7	0.79	1,135
1979	136.8	92.7	0.68	1,212
1980	136.5	91.3	0.67	1,056
1981	73.0	57.6	0.79	1,241
1982	47.0	47.6	1.01	893
1983	48.9	36.4	0.74	842
1984	46.9	20.3	0.43	616
1985	106.3**	21.3	0.20	644
1986	88.3	37.1	0.42	731

Source: Fisheries of the United States, NMFS.

* Alaska Department of Labor, Dutch Harbor Census Subarea (includes Akutan)

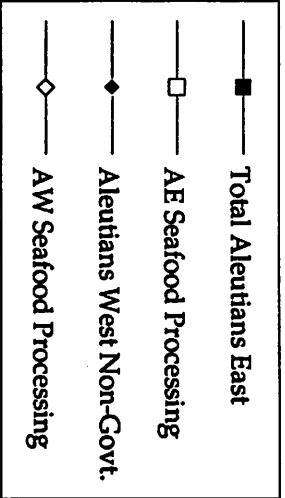
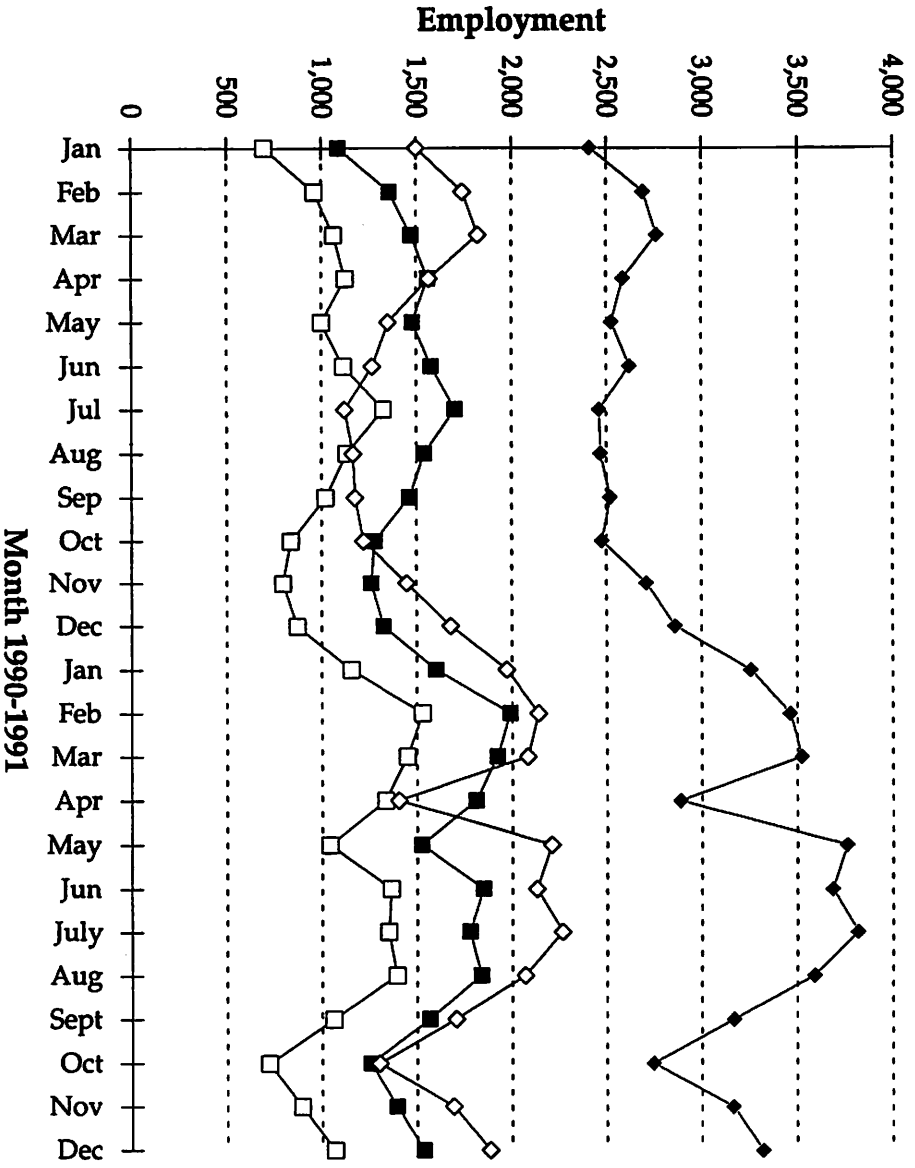
** This appears to be an error, but is shown as reported.

Figure 1. Aleutians Annual Average Employment 1977-1991



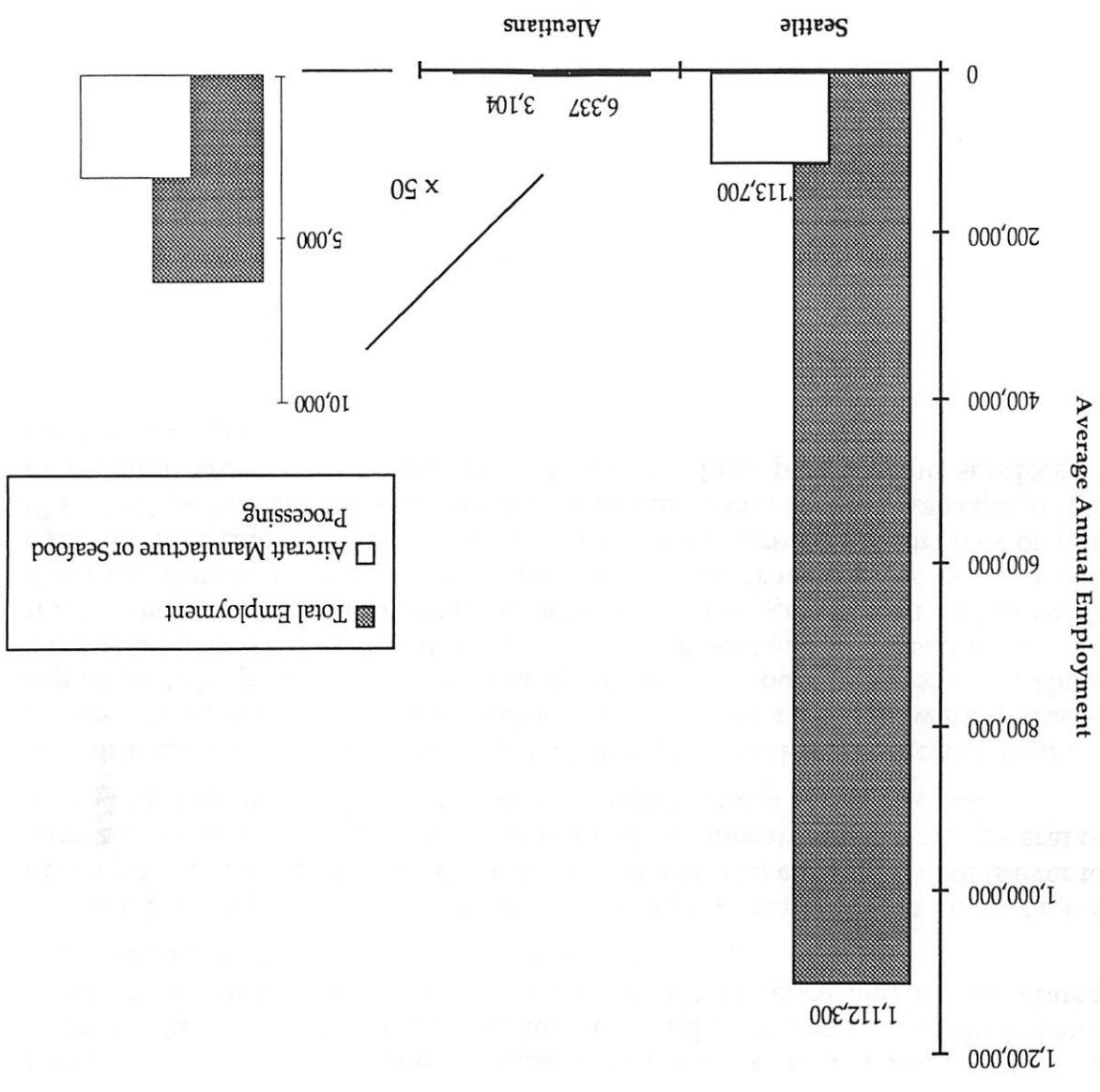
Source: Alaska Department of Labor

Figure 2. Aleutians Employment 1990-1991



Source: Alaska Department of Labor

Figure 3. Comparison of Seafood Processing Employment in Aleutians Compared to Aircraft Manufacturing in Washington and Seattle.



Source: Alaska Department of Labor

SOCIAL COSTS

There are clearly significant social costs associated with allocations between the industry sectors. Aside from the obvious direct employment impacts to a largely Pacific Northwest processing work force, there are major impacts to the permanent resident populations of the Alaskan coastal communities. Many of these people work in inshore seafood management positions or in the service sector, as transportation and repair and maintenance workers, where income levels are much higher than for processing workers in either sector. They have made permanent investments in these communities.

Impacts to those people would almost surely lead to greatly increased social costs. The link between economic health and social problems such as alcohol and drug abuse, mental health problems, domestic violence and sexual abuse, unemployment, and more is well documented.

As noted in the SIS, "St. Paul, as a community, explicitly in need of the development of a local sustainable economy, is a special case. If St. Paul is ever to have a place in this fishery, some form of inshore allocation (either in general or to the Pribilofs specifically), is necessary."⁸ This is true of St. George also.

It is difficult to document the costs and the losses that would accrue to these communities; however, if the inshore share of the resource were reduced significantly by preemption there is no question they would be substantial. There are major costs associated with the population growth and increased number of transients that have accompanied growth in the groundfish industry. A disproportionate number of these problems come from transients, who will continue to create social demands whether the inshore sector survives or not. (See SIS Pg 4-50). Obviously, reducing the inshore sector and the consequent loss of revenue would strain municipal budgets which provide the services to address these problems.

⁸SIS Conclusions, Pg. 5-7.

Chapter 2

Environmental Considerations

DISCARDS AS AN ECONOMIC INEFFICIENCY

The State of Alaska does not condone the waste of fish. In fact, state law makes it a criminal offense for any individual to engage in the wanton waste of seafood or seafood products. Economic discards clearly constitute wanton waste. Fish which are processed into meal and oil do not.

The State of Alaska is concerned about the incidence of discard in the EEZ. According to the Supplemental SEIS, total pollock discards in the directed pollock fishery during 1991 were 111,313 mt. Of this amount, the offshore component accounted for eighty-five percent (94,822 mt), while the inshore component accounted for the remaining fifteen percent (16,491 mt). Although there are many reasons why discards occur, the state cannot condone this level of wanton waste.

The use of metric tons often disguises the true level of discards. Viewed as pounds instead of metric tons, 1991 pollock discards were 245,400,640 pounds. *This is equivalent to approximately six times the entire commercial harvest of salmon in Washington State, or the entire combined commercial harvest of herring, halibut and shellfish in Alaska in 1990.*

Table 3 reviews the various inshore/offshore allocation alternatives and the impact of 1991 discard levels on the individual component allocations. This table assumes a TAC of 1.3 million mt minus a CDQ of 7.5% (97,500 mt), for a directed pollock harvest of 1.2 million mt.

Table 3 shows that the offshore component can increase its directed *retained* harvest by 11% or more in each of the allocation scenarios merely by retaining and using the pollock it is already catching. The state believes the Council and the Secretary should take into account the role of discards and the impact on retained harvest, and should not ignore the ability of each component to increase its own harvest by learning to use what it catches.

One of the arguments surrounding discards is the issue of whether or not they represent a cost to the nation. Some in the industry suggest that a certain minimal level of discards may be necessary or realistic, but that discards above that level occur as a result of poor fishing practices or bad judgment. Such discards constitute a cost since they would otherwise have been utilized.

Table 3
Potential Increases in Harvest Share
by Offshore Component through the Use of Discards (mts)

30%/70%	Pollock	Pollock	Total	Percent
Allocation	<u>Harvest (mt)</u>	<u>Discards (mt)</u>	<u>Harvest (mt)</u>	<u>Discards</u>
Inshore	344,259	16,491	360,750	4.57%
Offshore	746,928	94,822	841,750	11.26%
Total	1,091,187	111,313	1,202,500	9.26%

35%/65%	Pollock	Pollock	Total	Percent
Allocation	<u>Harvest (mt)</u>	<u>Discards (mt)</u>	<u>Harvest (mt)</u>	<u>Discards</u>
Inshore	404,384	16,491	420,875	3.92%
Offshore	686,803	94,822	781,625	12.13%
Total	1,091,187	111,313	1,202,500	9.26%

40%/60%	Pollock	Pollock	Total	Percent
Allocation	<u>Harvest (mt)</u>	<u>Discards (mt)</u>	<u>Harvest (mt)</u>	<u>Discards</u>
Inshore	464,509	16,491	481,000	3.43%
Offshore	626,678	94,822	721,500	13.14%
Total	1,091,187	111,313	1,202,500	9.26%

45%/55%	Pollock	Pollock	Total	Percent
Allocation	<u>Harvest (mt)</u>	<u>Discards (mt)</u>	<u>Harvest (mt)</u>	<u>Discards</u>
Inshore	524,634	16,491	541,125	3.05%
Offshore	566,553	94,822	661,375	14.34%
Total	1,091,187	111,313	1,202,500	9.26%

Source: Discard information from Table 1.3 of Supplemental SEIS

Note: The volume of discards in mt remains constant even though total harvest and the accompanying discard percentage rate varies. This is because NMFS assumes they know the definitive amount of discard but do not definitively know the total retained harvest because it is back calculated using product recovery rates that are suspect.

The inshore discard rate during 1991 was 4.3% while the offshore discard rate was 9.01%. The total offshore harvest was 1,052,625 mt and the amount of pollock discarded by the offshore component was 94,822. Assuming that the inshore discard rate accurately reflects the high end of minimal necessary discards, the amount of unnecessary discards is 49,308 mt.⁹ (See Table 4.)

Table 2.3 of the Supplemental SEIS reflects the product mix that would result from using these fish. Using those product mix percentages (including ancillary products), the NMFS scenario product recovery rates, and NMFS mode product prices, the offshore sector unnecessarily discarded \$ 34,986,740 worth of finished pollock products (see Table 5).¹⁰ This is a direct cost to the nation.

FULL UTILIZATION

A limited number of offshore processors have fish meal processing equipment. Those that do not have meal plants discharge their groundfish processing waste and discards untreated beyond grinding and screening to 0.5". The recoverable meal and oil wasted can be estimated using SEIS primary product recovery information.

Other ancillary products may be recovered as well, though for the example in Table 6 only meal and oil is considered. An estimated 25% of the offshore processing capacity includes fish meal capacity. If this is fully utilized, the offshore fleet still wastes nearly 100,000 mt of meal and oil. (See Table 6.) By contrast, the shore plants recover all of their discards and processing wastes.

**Table 4
Volume of Unnecessarily Discarded Pollock**

Offshore harvest	1,052,625	
Offshore discard	94,822	9.01%
Inshore harvest	381,397	
Inshore discard	16,491	4.32%
High End of Minimum Discards	45,514	4.32%
Difference	49,308	(In Pounds) 108,675,202.90

Source: Discard rates SEIS Table 1.3

⁹Supplemental SEIS, Table 1.3.

¹⁰ SEIS Tables 2.3 and 2.5.

Table 5
Value of Unnecessarily Discarded Pollock

Primary	<u>NMFS Prod.</u>	<u>NMFS</u>	<u>NMFS PRRs</u>	<u>Total Value</u>
	<u>Mix</u>	<u>Prod.</u>		
		<u>Prices</u>		
Filletts	33.9%	\$1.28	17.3%	\$8,158,048
Surimi	54.0%	\$1.50	17.7%	\$15,580,764
Minced	2.3%	\$0.71	26.3%	\$466,737
Meal	9.8%	\$0.24	0.16%	\$4,090
Total	100%		Total Primary	
			Products	\$24,209,638
Ancillary				
Roe	1.7%	\$5.38	NA	\$10,056,369
Surimi	0.04%	\$1.50	NA	\$65,205
Minced	0.16%	\$0.71	NA	\$123,455
Meal	2.0%	\$0.24	NA	\$532,074
Total	3.96%		Total Ancillary	
			Products	\$10,777,103
			Grand Total	\$34,986,740.72

Source: Product Mix SEIS Table 2.6, Prices Table 2.5

Table 6
Recoverable Meal and Oil Wasted
(Using Industry Recovery Estimates)

Primary Product	Offshore	Recovery
Surimi		
Round Wt	521,956	17.5%
Finish Product	91,342	
Processing Waste	430,614	
Fillets		
Round Wt	239,457	23.5%
Finish Product	56,272	
Processing Waste	183,185	
Discards		
Round Wt	94,821	100.0%
Waste	94,821	
Meal		
Round Wt	23,588	18.0%
Finish Product	4,246	
Unrecoverable Waste	19,342	
Mince		
Round Wt	20,083	29.0%
Finish Product	5,824	
Processing Waste	14,259	
Total Primary Product	151,861	
Total Processing Waste and Discards	722,878	
Ancillary Meal/Oil Recovered	32,671	
(assuming 25% of offshore capacity has and uses fish meal and oil capability)	148,837	
Wasted Meal and Oil	97,447	

Source: SEIS Table 2.4

SEAFOOD WASTE DISCHARGES

Under the National Pollution Discharge Elimination System (NPDES) permitting requirements, offshore processors are only required to grind and discharge their seafood waste to one-half inch in diameter (12.5 mm) before dumping. Shoreside groundfish processors in the Bering Sea, on the other hand, are required to obtain individual discharge permits from the Environmental Protection Agency and certified by the Alaska Dept. of Environmental Conservation as meeting state water quality standards. These individual permits require:

- Screening waste to 5 mm maximum dimension (or 1 mm in the case of some Bering Sea shorebased processors);
- Converting the recovered material into fish meal;
- Weekly waste water testing;
- Twice annual dive surveys to measure waste piles;
- Receiving water dissolved oxygen monitoring; and,
- Drogue studies of the receiving waters.

Also, state fish inspections include Permit to Operate, product wholesomeness regulations, Processors Annual Report, bonding requirements, etc.

Discharge Permit Enforcement

The shorebased processors are subject to routine inspections by DEC and EPA. The offshore processors face no enforcement since they can only be inspected when they come to port to off load and resupply; of course, since they are not actively processing at that time, there is nothing to inspect. Due to the difficulty of monitoring the offshore component, reliable information on compliance is not available. DEC has estimated, however, that less than 2% of general permit violations by these vessels are discovered.¹¹

SEAFOOD INSPECTIONS

Inshore processors are required to meet state fish inspection regulations which expand on federal FDA requirements. The regulations require plans of operation that contain information on processing procedures, quality control, labeling, species to be processed, water supply and waste discharge. Offshore processors have no seafood inspection requirements beyond minimum FDA requirements.

¹¹"Bottomfish Seafood Processors in the Vicinity of Dutch Harbor and the Bering Sea", Alaska Department of Environmental Conservation, July, 1992.