

BERING SEA POT COD COOPERATIVE
12042 SE Sunnyside Rd, PMB 333
Clackamas, OR 97015

May 30, 2025

Ms. Angel Drobica, Chairwoman
North Pacific Fisheries Management Council
1007 West Third, Suite 400
Anchorage, AK 99501

RE: D3 – BSAI Pacific Cod Pot LAPP Discussion Paper

Dear Chairwoman Drobica and Council Members:

The Bering Sea Pot Cod Cooperative (BSPCC) is a trade organization that represents stakeholders in the BSAI $\geq 60'$ Pacific Cod Pot CV sector. We appreciate the additional information provided in the discussion paper at this meeting based on the Council action taken in June of 2024. Following are our comments on D3 – BSAI Pacific Cod Pot LAPP Discussion Paper.

The BSPCC shares the Council's concerns with multiple issues that are simultaneously negatively impacting the sustained viability and rational prosecution of the fishery for all its participants. These factors include: decreasing Pacific cod TACs, an increase in the number of participating LLP licenses in the CV sector, the potential for additional new participants in both the CV and the CP sectors, a race among existing participants (often in unsafe conditions), resulting in an inability to control bycatch of crab, and increasingly shortened seasons in recent years.

Development and implementation of a LAPP program addresses the issues described above and complies with Executive Order 14276 – *Restoring American Seafood Competitiveness*, as well as, many of the National Standards (NS) as delineated in the Magnuson-Stevens Act. Without going into specific detail, those include the following:

- NS 1 - Optimum Yield
- NS 2 - Scientific Information
- NS 4 – Allocations
- NS 5 – Efficiency
- NS 8 – Communities
- NS 9 – Bycatch
- NS 10 – Safety of Life at Sea

This is not an entry level fishery. Prosecution of the fishery requires multimillion dollar platforms and hundreds of thousands of dollars in gear, as well as ownership of an LLP endorsed for the fishery. That being said, there is plenty of flexibility/opportunity for new entrants to participate in the fishery. Simply put, acquire a vessel, gear and purchase of an endorsed LLP.

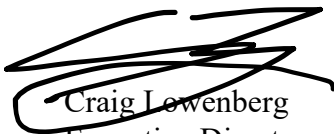
In addition to addressing the issues referred to above, implementation of a LAPP program will allow for improved product quality and value, improved stability in the harvesting and processing sectors and increased flexibility in fishing plans. All of which comply with recently issued Executive Orders.

Furthermore, development of a LAPP program is in line with the recommendations made by the Alaska Bycatch Review Task Force.

Since this issue was first considered by the Council in 2019, the Council has directed stakeholders to collaborate on a comprehensive framework for analysis. While there is still not 100 percent consensus among stakeholders over allocation issues, the majority of historical participants would like to see the Council analyze a variety of allocation options. We would also encourage the Council to consider the source of the stakeholder voices in opposition to moving forward with development of a program. The overwhelming majority of which are not long-term historical participants and/or are leasing LLPs in order to participate in the fishery. We are not aware of any rationalization programs where all stakeholders were in complete agreement at the onset of it's development.

With the understanding of the Council's budgetary/resource-availability concerns and the direction given by Presidential Executive Orders, we believe now is the appropriate time to move forward with the review of alternatives and options necessary to implement a cooperative based LAPP program. We appreciate the Council's consideration of such a program for our sector and look forward to participating in the development process. Thank you.

Sincerely,



Craig Lowenberg
Executive Director
Bering Sea Pot Cod Cooperative
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