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Mr. Simon Kinneen  
North Pacific Fisheries Management Council  
605 W 4<sup>th</sup> Ave, Suite 306  
Anchorage, Alaska 99501

Regarding Item: D2 Pacific Cod Trawl Catcher Vessel Fishery

Dear Chairman Kinneen and Members of the NPFMC,

My name is Robert Breskovich, I own the *F/V Aleutian Challenger*, (AC) a 100-foot, independently owned trawl catcher vessel, (CV) that's been fishing Pacific cod in the Eastern Bering Sea and the Aleutian Islands fisheries for over 20 years. I am an active members of United Catcher Boats (UCB) and we support UCB's request to the NPFMC to develop a Catch Share program for the BSAI P. Cod CV trawl fishery, though we'd ask the Council include the following items as this action moves forward through the Council process. In general, my hopes are that the Council is mindful of the few remaining independently owned CVs like the AC and that your actions on this issue support independently owned CVs.

1. The Council should have a clear understanding of the ownership structure of the CV fleet, including which CVs are affiliated through ownership with their cod markets and which CV's are independently owned. If analyzed, I'm confident it will show that at least 70% of the cod CV fleet actively fishing cod are fully affiliated, through ownership with their processor. This information is critical as the Council considers processor protections in a way that hopefully doesn't disadvantage the few remaining, independently owned CV's.
2. The AC has fished exclusively for Mothership (MS) markets. Recently four companies were providing MS markets but due to the Council's action last April half of those markets were eliminated. Of the two remaining MS's one is for sale and it's well within the realm of possibilities that soon only one MS operation will remain. That MS has a fully vertically integrated fleet of its own and they typically do not offer markets to non-affiliated CV's. Considering this, I feel it is imperative that quotas, or coop shares, if assigned to CV's, can move freely between markets offshore to inshore and visa-versa.
3. We ask the Council to be consistent with your recent action in TLAS Yellow Fin Sole when stacking LLP Licenses have occurred as highlighted in in the Scoping Paper. In the TASL YFS action you solved the same issues by simply having the vessel owner choose one LLP to assign the TLAS endorsement and that option should apply to a P. cod catch share program if catch history is assigned to an LLP.
4. AFA cod caps, highlighted as "Cod transfers with AFA cooperatives" were developed to enforce AFA sideboard restrictions and were never intended to be quotas or cooperative shares and that speaks for itself.
5. Within any suite of years that are chosen to determine allocations of P. cod, there should be an option

to drop a year to accommodate for hardships when CV's lost a season due to unexpected circumstances.

In summary, whatever you do please don't harm the independently owned CV's and please protect the CV's that have been consistent players in the cod fishery.

Sincerely,



Robert Breskovich