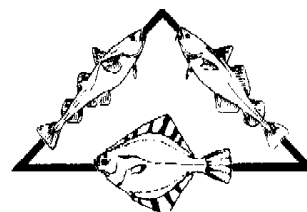


Alaska Groundfish Data Bank



P.O. Box 788 Kodiak, AK 99615 (907) 486-3033
Julie Bonney, Executive Director jbonney@alaskagroundfish.org
Chelsae Radell, Assistant Director cradell@alaskagroundfish.org

May 31, 2024

North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, Alaska 99501-2252

Re: Agenda Item D3 - CGOA Rockfish Program Review

Dear Chairwoman Drobnica and Members of the Council,

Alaska Groundfish Data Bank, Inc (AGDB) is a member organization representing Gulf of Alaska (GOA) shorebased trawl vessels, mostly homeported in Kodiak and shorebased processors that operate in the GOA. Many of our members, both vessels and processors, are engaged in the shoreside catcher vessel (CV) sector of the Central GOA Rockfish Program (CGOA RP). Chelsae Radell, Assistant Director of AGDB, is the Cooperative Manager for the five shoreside RP cooperatives and the Inter-cooperative Manager. This letter is on behalf of the five RP cooperatives and their processing partners.

Current Status of 2024 CGOA RP Fishery

The RP's scheduled Program Review could not come at a more critical tipping point for the CV sector. There have always been challenges unique to harvesters and processors in the RP and the cooperative structure was formed to help alleviate those issues. However, the commercial fishing industry's current extreme stress due to global and domestic seafood market conditions across all species and sectors has only exacerbated issues in the RP. In early 2024, Kodiak's largest trawl processor, which is associated with two rockfish cooperatives, informed their cooperatives that they are not buying rockfish for the 2024 RP fishery. The remaining three RP processors have reduced ex-vessel pricing across all species and some have also placed significant limitations on the amount of RP cooperative quota (CQ) species that they are willing to buy and process from their respective cooperatives.

To put the effects of these market conditions into perspective, Table 1 shows how 2024's CGOA RP CV landings of primary rockfish species (Pacific ocean perch, northern rockfish, and dusky rockfish) and percent harvested to date compared to the same timeframe in previous years. As of this writing, we have harvested half of what we had at this point last year, and only 20.8% of our CV TAC has been landed. This is the lowest percent harvested by May 31 in the history of the RP and half of the average percent harvested by this point in 2013-2023 (42%). It should be noted that although 2022's harvest appears to have been only slightly better than where we are currently at in 2024, this was due to a late start in 2022 while processor-vessel price negotiations occurred, so harvest timing shifted slightly and was compensated for with robust harvests later into June. This will not be the case for 2024.

Table 1. CGOA RP CV Primary RF Harvest from Season Opening through May 31 from 2013-2024.

Year	CV Primary RF Harvest (mt)	CV Primary RF TAC (mt)	% Harvested
2013	2,651.40	9,943	26.67%
2014	4,878.52	11,456	42.58%
2015	4,714.93	12,473	37.80%
2016	7,787.68	13,792	56.47%
2017	4,044.57	12,915	31.32%
2018	7,192.77	13,559	53.05%
2019	7,885.59	14,356	54.93%
2020	7,516.23	15,815	47.53%

Year	CV Primary RF Harvest (mt)	CV Primary RF TAC (mt)	% Harvested
2021	9,898.25	19,615	50.46%
2022	4,976.30	21,580	23.06%
2023	8,636.46	22,098	39.08%
2024	4,356.00	20,937	20.81%
Average 2013 - 2023	6,380.25	15,237	41.87%

Suggested Expansion of the Table of Contents

The RP shoreside cooperatives support the data anticipated to be used in the review as described on page 3 of the work plan and the proposed Table of Contents on pages 4 - 6. While we realize that complete 2024 data may not be available for each data type and source, we request that it is included in the Review to the extent possible given that our current reality in the RP differs so greatly from the historical norm. We will ensure that staff have access to the annual RP cooperative reports; the cooperatives request that this information be used to ensure the review takes a closer look at limitations, such as processing capacity and monitoring in the fishery. For the proposed outline we would suggest the following be added or expanded.

1.) Monitoring (Add):

The work plan states the report will provide information on industry progress and efforts to develop an electronic monitoring program for the fishery. To understand why industry is moving in this direction we would request that there be background information provided about the state of monitoring in the fishery presently. Specifically, this should include observer availability and observer cost over the history of the program and efficiency of the present monitoring system.

2.) TACs, Allocations, Harvests, Processing, and Transfers (Expand):

The program review should expand across the following topics for this section.

Fishery Timing: The Rockfish program has always been a relatively small portion of Kodiak landings, however, this fishery is a critical part of the business plan for both the processors and the approximately 27 vessels that participate each year. One of the main objectives of the program is to fill in the times of year when processors are idle. This allows each vessel the ability to develop a fishing plan where the RP provides opportunity and income when the vessel isn't participating in another different fishery. The RP is open from May 1 until November 15, but over the seventeen years of the program, landings have coalesced primarily around the months of May and June and again in the late Fall after the pollock fishery closes. Please provide landing data to understand this change over the program's history. The Review should also consider:

- a.) the tradeoffs for the fishery safety due to fishing in shoulder seasons with poorer weather
- b.) whether less harvest of Northern Rockfish and Dusky rockfish has occurred due to less catchability now that the fishery occurs in the shoulder seasons rather than in the summer
- c.) a description of how other fisheries have changed that affect annual landings for the port of Kodiak (i.e. pollock, flatfish and cod), etc.

Processing Capacity: Amendment 113, currently a Proposed Rule, changes the processing cap from 30% to 40%. The change was designed to address the reduction in the number of processors and available processing capacity that have been participating in the program seasonally and annually. The Program Review should further evaluate whether the increase in the cap will be adequate to effectively address the problem. Information from over the history of the RP that would help this evaluation include:

- a.) the change in the number of RP processors operating annually
- b.) how the number of RP processors taking RP deliveries fluctuates by month each year

Rockfish quota: In the Review, provide tables that show:

- a.) the available quota for each CQ species by sector from the beginning of the RPP (2007) to present

- b.) the amount of harvest of each CQ species by sector
- c.) an evaluation of potential reasons why species have not been fully harvested

3.) Products and Markets (Expand): To thoroughly address issues in RP products and markets, expand upon the following over the history of the RP:

- a.) An evaluation of product mix changes across the CV and CP sectors
- b.) An evaluation of wholesale pricing across the CV and CP sectors
- c.) How rockfish fits into the overall market crisis, including if oversupply exists for rockfish species or if other problems exist due to substitute fish species.

Thank you for the opportunity to comment. We look forward to collaborating with Council and Agency staff on the Review.

Sincerely,



Chelsae Radell
Assistant Director, Alaska Groundfish Data Bank
RP Shoreside Cooperatives Manager
RP Shoreside Intercooperative Manager