March 27, 2025

Ms. Angel Drobnica, Chair
North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, Alaska 99501-2252

D3 – Central GOA Rockfish Program Review

Dear Chair Drobnica and Members of the Council:

As part of the Central GOA rockfish program review, Silver Bay Seafoods respectfully requests that the Council consider whether the processor use caps are set at appropriate levels. The current 40 percent cap, although recently established, may prevent the industry from best satisfying markets and realizing operational efficiencies.

Silver Bay Seafoods is a fishermen-owned seafood processing company, founded in Sitka. We own and operate seafood plants across the State of Alaska with over 3,500 employees statewide. Our operations also support thousands of independent fishermen in the state. Our fisherman-owners and employees depend on the fisheries managed by the Council.

As you may know, Silver Bay Seafoods is in the process of increasing our processing activity in Kodiak by acquiring interest in a second processing plant. We intend to continue operating both facilities for not only rockfish, but also other groundfish species and salmon. In the future, market demands and processing efficiencies could favor concentrating rockfish processing in either facility in a given year, as the two plants produce different products that serve different markets. These efficiencies may be prevented by the current caps that apply at the facility level. Recent changes and challenges in the processing sector suggest that additional flexibilities available through revisiting the processing caps may allow Kodiak's shorebased processors to better serve markets and the fishermen who deliver their catch to us.

This proposal is not time sensitive. In the interest of using staff time efficiently, we ask that the Council look for an opportunity to advance this as part of an appropriate amendment package that includes other actions.

Thank you for considering our request.

Sincerely,

Mark Fina