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# OCEAN PEACE, INC.

FISHING VESSEL MANAGEMENT COMPANY

F/V Alaska Victory - F/V Alaska Warrior - F/V Green Hope - F/V Ocean Peace - F/V Seafisher

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May 25, 2021

North Pacific Fishery Management Council  
1007 West Third, Suite 400  
Anchorage, AK 99501

Agenda Item C-4 BSAI Pacific Cod Trawl Catcher Vessel LAPP Initial Review

Dear Chairman Kineen;

Ocean Peace, Inc. manages the non-AFA catcher vessel *Green Hope*, whose LLP will qualify for the Pacific cod trawl catcher vessel (PCTC) program should it come to fruition. Our LLP is one of a handful identified in Table 2-126 that is entirely dependent on offshore processing for their participation in the cod fishery. In recent years our qualifying LLP delivered to Ocean Peace, Inc. catcher processors, but this year we secured a market with the *Katie Ann*. The *Green Hope* does not have a refrigerated seawater system so it does not have the ability to deliver shoreside. As such, it is imperative that we maintain the ability to deliver offshore, and if an offshore market cannot be secured, that we be able to lease our cod.

Please consider our comments on the following elements:

## **Element 4 – Gulf of Alaska Sideboards**

We agree with the comments submitted by the Alaska Groundfish Databank for Element 4.2 and 4.2.1. The *Green Hope* is a participant in the CGOA Rockfish Program, but has not fished in the GOA for many years. Our interpretation of 4.2 is that if we do not fish in the GOA (except CGOA Rockfish) then we are not ‘benefitting from a sideboard exemption’ in the GOA and therefore we would retain our ability to lease PCTC Program quota if needed. We request this be made explicitly clear in the next version of the document. Our intention is to fish our BSAI cod, but given there are only two offshore markets it is important that we maintain the ability to lease cod if we cannot find a market.

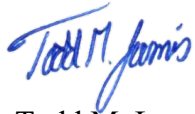
## **Element 5 – Processor and Community Provisions**

If 5.3.1 is adopted as written, our interpretation is that the *Green Hope* will be eligible to make deliveries to the offshore sector. As discussed in the document on pages 212-213, there are two ways the language in 5.3.1 is being read, but we think the language is clear. Our LLP license for the *Green Hope* shared (and continues to share) common ownership with catcher processors eligible for the offshore sector as of Dec. 31, 2019 and our LLP’s exclusive offshore delivery history clearly shows our reliance on an offshore market. We request that the Council confirm that their intention is to qualify 10 catcher vessels (as noted by asterisks in Table 2-126) should 5.3.1 be adopted.

The Council is contemplating two ways to potentially control how much cod can be delivered offshore. Element 5.2 would establish a sideboard limit on C/Ps acting as cod motherships, but this will be problematic if that limit is not high enough to accommodate long time participants with total or near total offshore reliance as shown in Table 2-126. The second way the Council is looking at potentially controlling how much cod can be delivered offshore is under Element 5.3 where only certain catcher vessels will qualify to deliver offshore. Either way, the overarching goal should be to ensure that those platforms and LLPs with total or nearly total reliance on an offshore market have an opportunity to harvest and deliver their fish offshore. We believe that Council action under Amendment 120 and the controls it imposed on offshore capacity will remain effective under the PCTC program and vessels and LLPs should retain the ability to operate as they historically have.

Thank you for your work on this issue and the opportunity to comment.

Respectfully,



Todd M. Loomis  
Director of Government & Industry Affairs  
Ocean Peace, Inc.