



# MIDWATER TRAWLERS COOPERATIVE

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Simon Kinneen, Chair  
North Pacific Fishery Management Council  
1007 West Third Street, Suite 400  
Anchorage, AK 99501

RE: C4: Central GOA Rockfish Program Adjustments

March 30, 2022

Dear Chair Kinneen and Council Members,  
Please accept these comments on behalf of Midwater Trawlers Cooperative (MTC). MTC represents 30 trawl catcher-vessels, several of which are long-term participants in the GOA Rockfish Program.

MTC members appreciate the Council taking swift action on this agenda item that will address negative impacts from the program which developed after the last program review. Specifically, operating conditions from the Covid pandemic, international trade tariffs and unexpected consolidation in shoreside processing in Kodiak have all contributed to a less than effective program structure which is no longer functioning as it was intended to. The changes being considered through this action will bring relief to program participants, while still meeting the original goals and objective of the Rockfish Program. At the same time, Gulf participants continue to struggle in the race for trawl fish outside the Rockfish Program as close attempts to rationalize that fishery have been abandoned due to politics. That makes moving forward with these small changes even more important for Gulf trawl participants and the community of Kodiak.

**MTC supports identifying Alternative 2 as the Preliminary Preferred Alternative (PPA).  
Further, MTC supports Options 1, 2, 3 (at 40%) and 4 as PPAs.**

### Option 1: Change Season Start Date from May 1 to April 1

When flatfish markets dried up due to continuing foreign trade tariffs, a big gap in shoreside processing during the month of April resulted. These foreign trade tariffs will likely continue. Combined with the upheaval of future operational challenges from Covid 19 outbreaks, the gap could grow from the month of April to well beyond May 1<sup>st</sup>. Complicating the issue is the summer salmon fishery and the resources needed to prosecute and process that fishery. The change in season start date would provide flexibility and more assurance that the rockfish program participants can successfully participate in the fishery. The change also helps to prevent any conflicts between groundfish and salmon processing opportunities, resulting in a longer processing season that allows groundfish to occur prior to the salmon season, instead of potentially at the same time. Following an emergency rule changing the season start date in 2021, it became clear that the earlier start date allowed more harvesting and processing opportunities with no negative associated conservation or socio-economic impacts. A significant amount of fish was harvested and processed, keeping vessels and processing plants operating in April – when they would have otherwise been idle. This change meets National Standards 1, 5, 6, and 8. More time to fish allows a better chance at achieving OY through allocation attainment (NS 1). The fishery will be more efficient (NS 5), and this provides for less chance of conflict with the salmon fishery in the summer (NS 6). Having harvesters and processors active during the month of April is clearly a benefit to the community of Kodiak (NS 8).

### Option 2: Eliminate the CV Cooperative holding cap

This component of the program is unnecessary and as the analysis illustrates, ineffective at staunching consolidation. Eliminating the CV Cooperative cap will result in less reporting burden for the agency which will ultimately cost less for everyone. Efficient and simple regulations provide more flexibility and eliminating unneeded regulations streamlines the process. There is no compelling reason to retain the CV Cooperative holding cap, and the analysis supports this conclusion. This option meets National Standards 5 and 7.

### Option 3: Increase the processing cap to 40%

It may seem confusing to have fishermen arguing to increase a processing cap. The reality is that the current cap is constraining and has resulted in fishermen having to strand fish – this is contrary to how the program is supposed to function. Initially included to prevent consolidation and spur competition, the current processing cap has failed to deliver. There are now only four shoreside processors while there was seven when the program was implemented. The goal from a harvester's perspective is to have healthy processors who can buy and process as much fish as they can market. The current processing cap is preventing this from happening. Raising the processing cap also allows the participants to be nimbler as

unanticipated challenges arise during the season – for example, a fire at a plant, a covid-19 breakout, or some other operational malady. Instead of having to come to the Council and NMFS and ask for emergency action, which is reactive, increasing the cap now is proactive. There are still “checks” to prevent excessive consolidation – but even if there were only one processor in Kodiak, wouldn’t we still want the ability to deliver as much fish to them as they could take? This change clearly meets National Standard 1, as more fish can be delivered achieving allocation attainment. Allocation attainment also support National Standard 8.

Option 4: Revise the vessel aggregated rockfish harvesting cap

A very small subset of the rockfish program participants harvests most northern rockfish and dusky. Removing these species from the aggregate cap will allow those few vessels to specialize in these species when other harvesters don’t catch them. There is no conservation concern here and removing these two species from the aggregate cap will allow more fish to be delivered into Kodiak. This change meets National Standards 1, 5, 7 and 8.

In conclusion, moving forward with the proposed action meets the purpose and need statement for this agenda item. Further, the proposed action meets all the applicable MSA National Standards. The rockfish program is not working as it was intended and these relatively minor changes will have a large positive impact on harvesters, processors, and the community of Kodiak. The proposed action also enjoys broad support from impacted stakeholders making the Council decision to move forward much easier.

Thank you for your consideration.



Heather Mann  
Midwater Trawlers Cooperative

**Midwater Trawlers Cooperative 2022 Members**

*F/V Bay Islander, F/V Excalibur, F/V Excalibur II, F/V Gold Rush, F/V Golden Pisces, F/V Grumpy J, F/V Hickory Wind, F/V Jamie Marie, F/V Leslie Lee, F/V Lisa Melinda, F/V Majesty, F/V Marathon, F/V Michelle Renee, F/V Miss Berdie, F/V Miss Sarah, F/V Miss Sue, F/V Muir Milach, F/V New Life, F/V Nordic Star, F/V Northern Ram, F/V Pacific, F/V Pacific Future, F/V Pacific Ram, F/V Pegasus, F/V Predator, F/V Raven, F/V Sea Clipper, F/V Sea Storm, F/V Seadawn, F/V Seeker, and F/V Winona J*