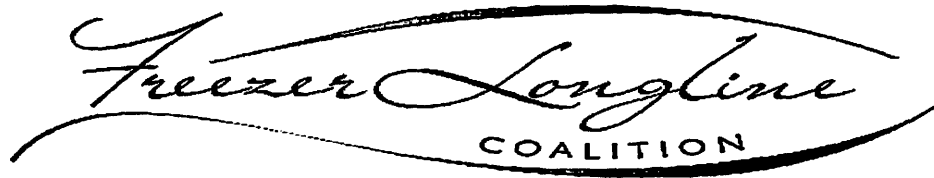


PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: DA Staff Tasking

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	REX MURPHY	ACA / AOC
2	Kenny Down	Freezer Longline Coalition
3	Stephen Taufen	Groundswell Fisheries Movement
4	Dave Fraser	ACDC
5	Clem Tillion	Alevt Corp.
6	Steph Maderer	self.
7	Jon Warrenchuk	Oceana
8	John Gauvin / Julie Brnny	AK Seafood Coop / AGDB
9	George Plsinikoff	Greenpeace
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.



**NPFMC October 2010
Agenda Item, Staff Tasking**

**Request for initial review
Approaches for Catch Accounting in the BSAI and GOA
Pacific Cod Catcher Processor Hook and Line Fishery**

Background

July 2009, Juneau AK, NMFS meeting / informal "CP hook-and-line catch accounting workshop" with Freezer Longline Coalition (FLC) representatives. Proposal for a new catch accounting protocol on board its vessels was presented by industry and overall needs discussed. Present at that meeting for NMFS were staff from inseason management, sustainable fisheries, catch accounting, observer program, enforcement, and general counsel.

September 2009, Juneau AK, NMFS meeting / follow up on catch accounting in the freezer longline sector. FLC and NMFS brought forth more detailed catch accounting proposals including all of the elements that were identified in our first meeting and subsequent conversations with NMFS. Both NMFS and the FLC committed to continue working on the issue in order to flush out concerns.

October 2009, North Pacific Fisheries Management Council, FLC requested that a discussion of improved catch accounting in the Pacific cod longline Catcher/Processor fishery (the freezer longline fishery) be prepared. The Council concurred with the FLC request and NMFS staff was tasked with the preparation of the discussion paper.

December 2009, Dutch Harbor NMFS staff held a public workshop. Following this workshop, NMFS staff visited 21 freezer longline vessels in Dutch Harbor and Seattle and discussed catch handling protocols and factory operations with vessel crew.

April 2010, North Pacific Fisheries Management Council, Discussion paper was presented by NMFS staff. No further action was agreed upon by NMFS staff, FLC representatives and Council. Further on board testing was required to determine feasibility of the flow scale options.

July 2010, On board testing was completed on board F/V Alaskan Leader using a NMFS certified flow scale. A NMFS representative was onboard during the initial testing to witness the effectiveness of this approach.

Initial Review

Approaches for Catch Accounting in the BSAI and GOA Pacific Cod Catcher / Processor Hook and Line Fishery

Document 2010

Industry Draft Problem statement and Alternatives

Problem Statement

In the BSAI, Pacific cod is allocated among sectors including the freezer longline sector, and in December 2009, the North Pacific Fishery Management Council (Council) took final action to implement sector allocations (including allocations to the freezer longline fleet) in the Western and Central Gulf of Alaska (GOA). The combination of a closed-class of vessels and a sector-specific allocation of Pacific cod has created the opportunity for these vessels to form voluntary cooperatives. The general management approach changes since entities that receive allocations are prohibited from exceeding those allocations, and if an allocation is exceeded, NMFS may initiate enforcement actions against the entity. These programs also impose additional burdens on industry to monitor their own allocations of catch and to cease fishing when those allocations are reached, which requires that program participants have quick access to catch accounting data so that they can monitor their quotas. Observer estimates of catch with only random samples weighed are problematic in this type of fisheries management.

Observer estimates of catch that are derived from samples always have some degree of variance or imprecision. Adding scales onboard vessels to weight total catch is likely to decrease the degree of variance or impression by industry that observer estimates are inaccurate. A regulatory amendment and associated analysis would be required to implement new monitoring and enforcement requirements for the freezer longline fleet if scale weights were to be accepted as official total catch for catch accounting purposes.

There are issues associated with catch accounting in the freezer longline fishery that make standard approaches problematic. Thus current standardized estimates of catch in use in other sectors would require significant modification, for use in the freezer longline fishery. Current practices are also not uniform in the CDQ and non-CDQ segments of the freezer longline sector and should be aligned.

Alternative 1

Status Quo

Alternative 2

Observer-Enhanced Sample Based Methodology under a Quota Program

Under this approach, NMFS would enhance the existing status-quo sampling approach using the sampling strategy from the Community Development Quota (CDQ) program as a starting point. The CDQ program places additional requirements on vessels above the level of non CDQ participants.

Alternative 3

Industry-Developed Product Recovery Rate Based Approach

In the freezer longline fishery, virtually all Pacific cod are processed into one of two head and gut products: western (head removed just in front of the collar bone) or eastern cut (head removed just behind the collar bone). Because there are a limited number of products, accounting for Pacific cod would be accomplished by weighing the entire processed product and using NMFS published PRRs to estimate the round weight of retained Pacific cod.

Alternative 4

Bled-Weight Approach

Depending on the factory layout for a given vessel, either a flow scale or a hopper scale system may be more appropriate, and NMFS anticipates that either system could be approved for this alternative application.

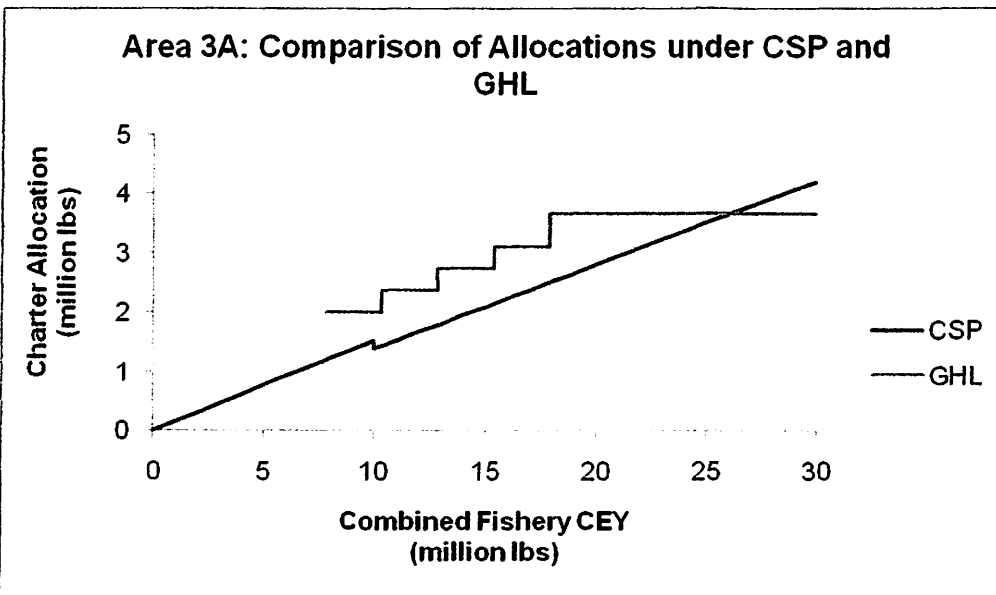
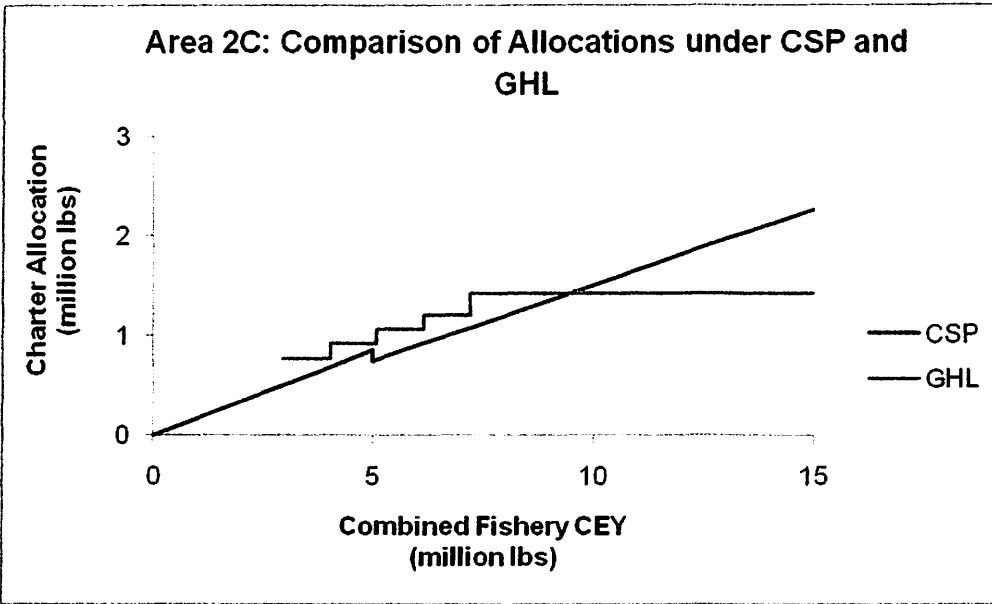
Trawl catcher/processors participating in a quota program are required to weigh all catch prior to processing. This approach would have to be modified for freezer longliners under this alternative, because species composition is estimated upstream from where catch can be weighed. It is not practical to weigh drop offs, fish discarded at the bleeding station, or large skates that are hand processed.

Problem Statement:

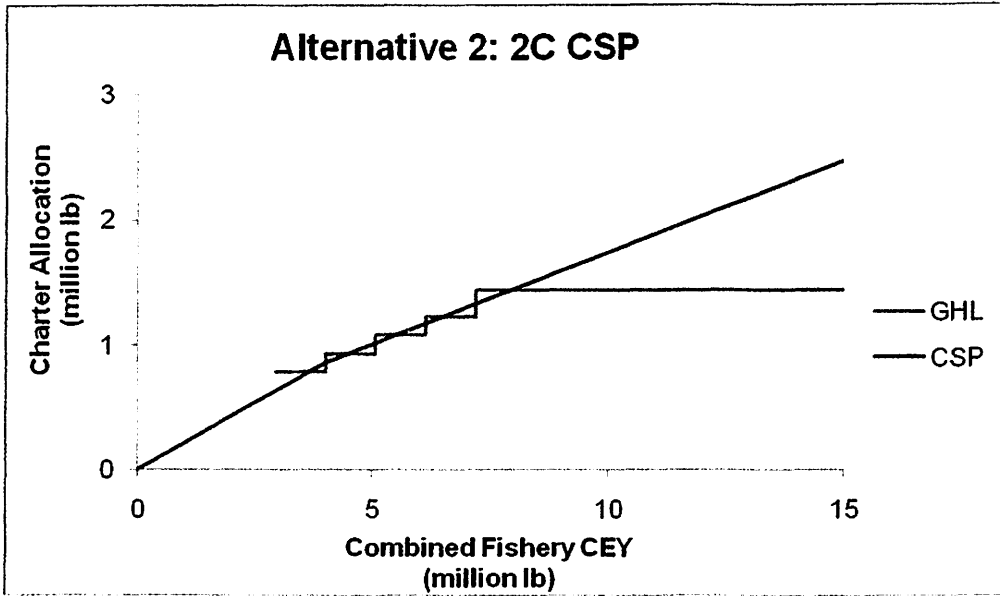
The guided recreational sector allocations chosen by the Council in its October 2008 Catch Sharing Plan (CSP) motion are well below the allocations under the Guideline Harvest Level (GHL) that they replace at all but the highest combined fishery CEY levels.

Alternatives:

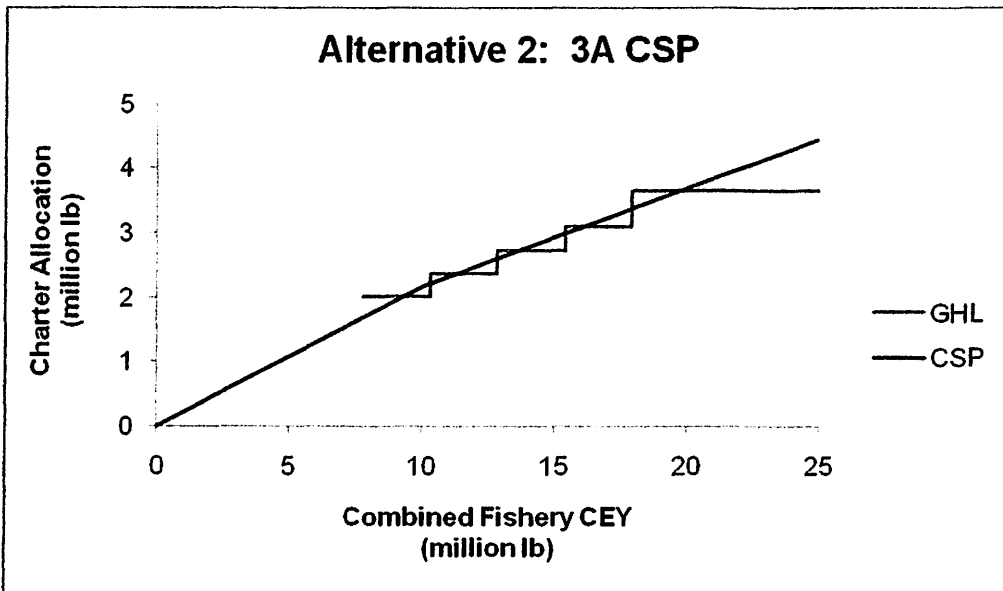
Alternative 1. Status quo. 2008 CSP Motion compared to GHL



Alternative 2:

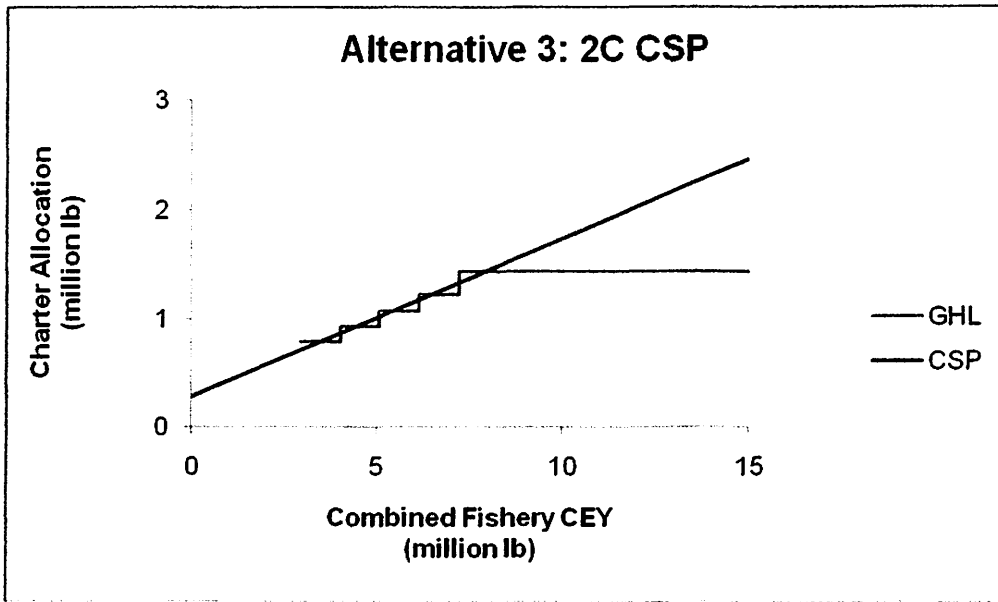


2C Allocation : Up to a CCL of 4.0 million pounds: 21.5% of the combined catch limit
Over a CCL of 4.0 million pounds, 280 k pounds plus 14.5% of the CCL

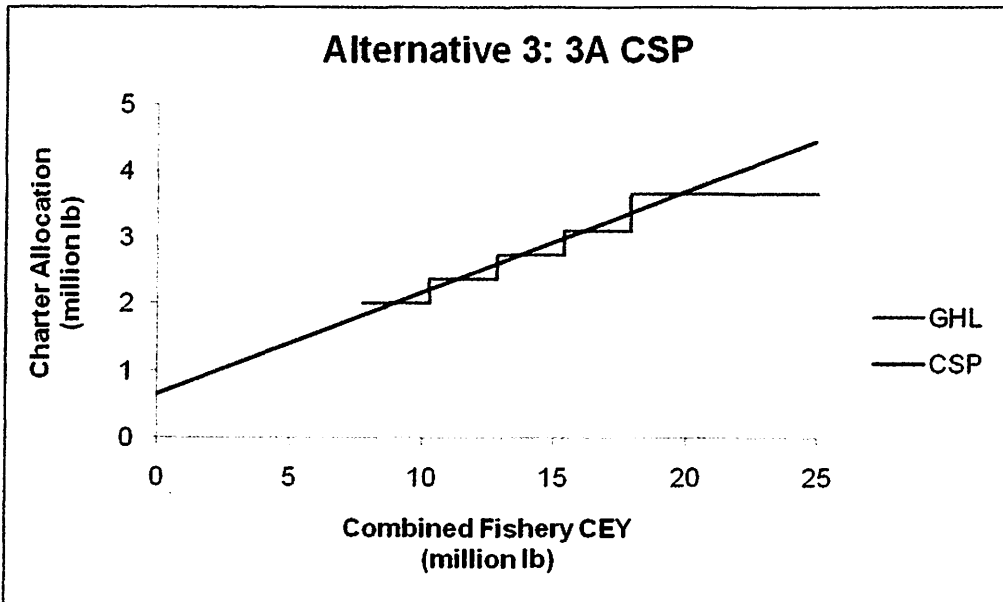


3A Allocation: Up to a CCL of 10.114 million pounds: 21.6% of CCL
Over 10.114 million pounds: 658 k plus 15.2% of the CCL

Alternative 3:



2C Allocation: 280 k pounds plus 14.5% of the CCL



3A Allocation: 658 k pounds plus 15.2% of the CCL