



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

September 28, 2020

Dear Chair Kinneen & Council Members

Please accept these comments on behalf of Alaska Groundfish Data Bank, Inc (AGDB) and Midwater Trawlers Cooperative (MTC). AGDB and MTC collectively represent a large majority of the catcher vessels and seafood processors who depend on trawl groundfish being harvested in the Gulf of Alaska and landed into the community of Kodiak.

It is well documented that the community of Kodiak relies heavily on the economic benefits of federal trawl groundfish fisheries. The Rockfish Program offers a stable management regime; however, the unproductive race for fish still exists for the non-rockfish trawl fisheries. The Council has long recognized there is a need for a durable management structure in the Gulf which ends the inefficient and archaic race for fish while promoting an accountable and viable trawl fishery. AGDB and MTC believe that moving forward with a rationalized program in the Gulf meets the directive of the May 7<sup>th</sup> Presidential Executive Order. Following this letter is the rationale of why we believe this recommendation is justified.

Alaskan businesses who rely on Gulf trawl groundfish fisheries have been struggling for several years. The current Covid-19 pandemic has exacerbated the challenges that harvesters and processors must overcome now and moving forward. The State of Alaska is making progress on its stated priorities and implementing a new program for the Gulf complements those priorities. The EO provides an opportunity for the Council to begin to move forward with a much-needed management program that is supported by the majority of participants. A rationalized program will end the race for fish, improve stability, provide for increased accountability and enhanced product development, increase economic benefits, and equip the fleet with the tools that they need to minimize bycatch to the extent practicable.

AGDB and MTC feel confident that rationalizing the Gulf not only meets MSA requirements but is one of the most beneficial federal actions that can be taken to support Alaskan fishing businesses and communities.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Julie Bonney". The signature is written in a cursive, flowing style.

Julie Bonney, AGDB

A handwritten signature in black ink, appearing to read "Heather Mann". The signature is written in a cursive, flowing style.

Heather Mann, MTC

**GOA Rationalization Meets Objectives of Executive Order 13921, “Promoting Seafood Competitiveness & Economic Growth” and Will Help the NPFMC Achieve its Goals for Fixing the Observer Program and Implementing a New BSAI Cod Trawl Rationalization Program**

Julie Bonney, Alaska Groundfish Data Bank and Heather Mann, Midwater Trawlers Cooperative  
September 28, 2020

Rationalizing the Gulf of Alaska (GOA) trawl fisheries is the exact type of action that the North Pacific Fishery Management Council (Council) can undertake to meet the intent of the May 7<sup>th</sup> Presidential Executive Order (EO) 13921. Not only would a rationalized management program meet the desired objectives of the EO, it would provide meaningful and direct benefits to participants, GOA coastal communities, the State of Alaska and the broader nation. GOA trawl rationalization would also help the State of Alaska meet its stated priorities, particularly fixing the observer program and designing a rationalization program for the Bering Sea Aleutian Island (BSAI) cod trawl fishery.

The EO seeks to strengthen the American seafood industry which has been decimated in places like the GOA due to climate variability, a Pacific cod fishery disaster, impacts of Covid-19 and tariffs on established seafood markets, and an unsustainable and inefficient race for fish. Exacerbating all of these challenges are numerous and competing regulations aimed at minimizing bycatch, protecting threatened and endangered species and essential fish habitat, and complicated and inefficient regulations to manage open access fisheries. Rationalized fisheries that end the race for fish were explicitly mentioned by NMFS leadership to the Council Coordination Committee during the May 27, 2020 meeting as a viable response to the EO. Ending the race provides many benefits to participants and communities, not the least of which is stability which results in increased revenue and American jobs.

As demonstrated by the 2016 McDowell Report, the community of Kodiak relies heavily on a healthy trawl industry. Trawlers delivered 83% of all groundfish to Kodiak in 2014 and 49% of all Kodiak seafood employment was driven by groundfish (1,952 FTE jobs) which have downstream benefits to fund infrastructure and other important community assets. The Social Impact Assessment (Council document, May 2016) shows that most GOA trawl catcher vessels are family-owned, and the majority are Alaskan residents. The Council has been on the cusp of rationalizing the GOA trawl fisheries many times, but unfortunately politics has gotten in the way of meeting the intent of the Magnuson-Stevens Act (MSA). The EO provides a fresh opportunity to implement a program responsive to the goals of the MSA that provides the community and participants with the tools necessary to increase production and value of sustainable seafood, minimize bycatch, become more competitive in the global market, end the inefficient, high-cost race for fish once and for all and move the industry into the 21<sup>st</sup> century. One has only to look at the glowing review of the Central GOA Rockfish Program to see the accrued benefits from a rationalized trawl program.

The EO directs managers to “strengthen the American economy; improve the competitiveness of the American industry; ensure food security; provide environmentally safe and sustainable seafood; support American workers; ensure coordinated, predictable and transparent Federal actions; and remove unnecessary regulatory burdens.” A rationalized GOA trawl fishery accomplishes all of these goals and more. Without the race, the fishery becomes more predictable with a strategic flow of fish resulting in higher quality fish for traditional products as well as the opportunity to create new product forms. Rationalized programs are highly regulated to ensure transparency, which in turn provides for increased food security. Wild fish in itself is an environmentally safe food source. Rationalization improves the sustainability of the fisheries by increasing accountability, reducing regulatory discards and allowing individual fisherman to fish more carefully, retain more fish and utilize tools to minimize bycatch – these are not viable options during the race for fish. As we continue to experience the dire economic impacts

of the Covid-19 pandemic, fisheries can be a bright spot if opportunities are seized upon. As essential food producers, a rationalized GOA trawl fishery sets the industry on a long-term sustainable path. The stability of and efficiency in the fishery become more attractive to investments, new entrants and preserves the independent family ownership nature of the fishery. And while rationalized fisheries are highly regulated, they also streamline management providing the participants with a flexibility that is not afforded under a race for fish, thus meeting the goal of the EO to eliminate unnecessary regulatory burdens.

In the fall of 2019, the State of Alaska announced its priorities for the Council agenda: (1) fix the observer program and incorporate electronic monitoring systems into the program; (2) BSAI catcher vessel (CV) cod trawl rationalization incorporating meaningful sideboards for the GOA; (3) IFQ halibut recreational quota entity program; and (4) BSAI halibut bycatch abundance-based management. Development of a rationalization program for GOA trawl did not make the list. However, the state suggested that they would appreciate suggestions from stakeholders for regulatory measures to improve management of the fisheries under the current management structure.

Rationalized GOA trawl fisheries would go far in helping the state meet the objectives of two of the priority items, fixing the observer program and BSAI cod trawl rationalization. Many in the fishing community would prefer that GOA catcher trawl vessels have 100% observer coverage. This high level of monitoring is not necessary for a fleet wide management structure (race for fish) nor is it cost effective. Electronic Monitoring (EM) for the pelagic pollock fleet is well underway; while still early, the testing thus far appears to suggest that EM works well in the rationalized Bering Sea (BS) pollock fishery but not in the GOA open access pollock fisheries. A GOA trawl rationalization program would fix both –EM for GOA pollock and 100% observer coverage when the management structure is changed to an individual vessel-based system. Sideboards, as a rule, are complicated. Sideboards for the BSAI CV trawl vessels that participate in the GOA trawl fisheries will be hugely complicated to design and enforce. Some trawl participants want to re-examine all existing GOA sideboard regulations which will slow and complicate the BSAI package even more. Designing a GOA program in tandem with the BSAI CV cod program would remove the need for any GOA sideboards saving analytical and Council agenda time and would avoid going down the GOA sideboards rabbit hole.

We hope the Council agrees that moving the GOA trawl fisheries into a more stable and rational management program meets all the objective of the EO, helps fix two of the state of Alaska and Council priorities -- observer program and BSAI cod trawl rationalization. Building on previous work already completed, the Council could implement a much-needed program within a relatively short timeline, putting GOA trawl fisheries in a competitive position coming out of the Covid-19 pandemic, providing security and revenue to the community for decades to come.