



WESTERN FISHBOAT OWNERS ASSOCIATION®

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Don McIssac - Executive Director
Pacific Fisheries Management Council
7700 NE Ambassador Place, Ste 200
Portland, OR 97220-1384

February 23, 2006

Re: I.U.U. Fishing

Dear Mr. McIssac:

There is growing evidence that there is an increasing number of illegal, unregistered, and undocumented (IUU) driftnetters that are operating in the North Pacific and Indian Ocean, many flagged in the former Soviet republic of Georgia. Western Fishboat Owners Association (WFOA) is concerned about this ruse to prevent enforcement of existing international bans on illegal high seas drift netting. We are very concerned about this buildup in illegal effort, especially at a time when effort restrictions are being proposed on legitimate fleets fishing for albacore and other tunas in the Pacific Ocean. The elimination of these types of vessels should be a major concern to NMFS and the Fishery Management Councils.

Unless the problem of IUU fishing is adequately addressed there is serious concern about the effectiveness of US management measures and the future sustainability of both the resource and the legitimate fishing industry. WFOA has been working with the USCG and DHS to monitor and report these vessels in the North Pacific for a number of years. WFOA will continue to work with the Coast Guard to locate and apprehend these vessels, and will continue to raise this issue with elected and appointed leadership of the US and Canadian governments until this problem is brought under control.

We understand that the U.S. Coast Guard continues to receive information from the U.S. albacore fleet. The Coast Guard has reacted in the past to the fleet reported sittings of illegal high seas gillnets. While the USCG has limited resources to react to these reports, it does want to continue getting the reports and the USCG will react to the best of their ability. WFOA and AFRF will continue to educate regulators on the increase in this activity and the potential threat to the health of the albacore fishery. We are very concerned, as we were in the late 1980's and early 1990's, that unenforced fishing by these vessels will have dramatic impacts on the North Pacific albacore stocks where in the late 1980's catch dropped by nearly 80% by U.S. albacore fleets and did not recover until the mid 1990's. WFOA believes that the detrimental effects of this current IUU activity seem to

be detrimental to the U.S. offshore troll fleet is already clear as catches have been falling in the region in the past three seasons.

Fishermen have been active in reporting sightings as well as gillnet marked fish, however being in such a remote area makes it problematic to have enforcement in the area other than by air. Thus, they are unsure of the how to best report evidence of illegal fishing, such as the observation of violations on the high seas in order to get the most efficient response. The U.S. Coast Guard (USCG) Pacific Area Command and the National Marine Fisheries Service Office of Law Enforcement (NMFS OLE) needs to inform fishermen, of the best points of contact for the reporting of suspected IUU activities. WFOA and AFRF also recommend agencies involved coordinate their enforcement efforts more effectively.

At the November 2005 Pacific Fisheries Management Council meeting the Highly Migratory Species Advisory Subpanel (HMSAS) noted West Coast albacore fishermen have been encountering more net-scarred fish as well as visual sightings of active driftnet vessels. This raised a concern that there has been a recent marked increase especially in the region west of the international dateline. The HMSAS advised, and the Council concurred, that the Coast Guard and National Marine Fisheries Service Enforcement step up surveillance and international coordination to eliminate the illegal take of fish important to U.S. fishermen.

Once again WFOA strongly encourages coordination between any and all enforcement bodies both at the Federal and International levels to track and apprehend any vessels and vessel owners fishing with illegal gear types for albacore and salmon. WFOA also encourages more scrutiny of this activity by all Federal and International management bodies, and that those bodies call for enforcement reporting and follow through. Finally we also would like to see better and more thorough estimations of IUU catch and tracking of where and to whom those fish are marketed.

Sincerely,

Wayne Heikkila
Executive Director

cc: Mark Helvey, NOAA/NMFS
Dave Hogan, U.S. Department of State
Brian Corrigan, USCG