

PFMC Public Comment for April 7, 2008

Thank you Mr. Chairman and members of the Council for this opportunity to speak to you.

This Council was short-sighted when it created the Trawl Individual Quota (TIQ) committee. This Council has been unresponsive to suggestions of adaptive management included within the OSHUA plan. This Council has continued to promote unbalanced management - unbalanced in favor of the trawl fleet. The TIQ committee was given a purpose and goal of developing options that are primarily focused on economic improvement for the trawl component of the groundfish fishery. All of the options produced by the TIQ committee reflect this charge.

Instead of creating a TIQ committee of fishermen and processors this Council would have been acting responsibly and within the law by creating a Sustainable Groundfish Management committee with broad representation. The goal for this committee would have been to produce options for implementing a truly sustainable management plan for all groundfish sectors including: landing all marketable bycatch and thus preventing overfishing, minimizing discard of non-marketable bycatch, minimizing habitat destruction, and creating a healthy economic environment for the fleet. This committee would have been comprised of professionals from the state and federal agencies, council staff, environmental organizations, academia, and the fishing fleet. This committee would have had the breadth to address the issue of developing a truly sustainable management plan. As the TIQ committee has been constituted it can only produce options that are distorted in favor of the trawl fleet and the processors dependent on trawl caught fish.

The OSHUA plan is a balanced plan. It favors no gear-type group. It relies on personal responsibility. This personal responsibility will be the result of annual allocations assigned directly to individual permits. This is the only rational method that will place absolute limits on the number of participants. The first requirement for a sustainable fishery is an absolute limit on the number of participants. Once that has been achieved then devising an allocation method is the next step. Producing an allocation plan can be as simple as developing percentages using the

most recent five years of historical catch data. There is no need to produce an allocation plan any more complex than this.

The OSHUA plan focuses primarily on developing a sustainable plan with no overfishing. Economic benefits to the fleet will proceed from implementation of a sustainable management regime. More fish will benefit fishermen and processors alike. In contrast to the OSHUA plan, all of the TIQ committee options focus on how to privatize projected future allowable catches. The OSHUA plan demonstrates that a plan incorporating individual responsibility need not privatize the resource.

Other key features of the OSHUA plan are:

The OSHUA plan allocates fairly to all fishermen

All commercial sectors are eliminated allowing trading of allocations among all fishermen.

Each fisherman has the potential to increase his annual share of the fishery.

OSHUA is adaptive, sustainable management.

OSHUA guarantees that overfishing will not occur.

There are no property rights in the OSHUA plan.

Conforms to section 303A of the 2006 FCMA law

Uses the existing limited-entry permit system to allocate catch to individual fishermen.

Uses the most recent five year catch history to allocate catch.

The competition will be transformed into one of sustainable fishing competition.

Rebuilding species will be allocated in the same proportions as target species.

The OSHUA plan inherently allows for transition between rebuilding and target status

Includes mandatory quotas for the recreational fishery

Includes 75% observer and 100% video coverage

Eliminates all Unnecessary Complexity

Minimizes Habitat Destruction

Will eliminate latent effort

All marketable catch will be landed, improving catch accounting

Under OSHUA economic benefits will proceed to fishermen, processors, and communities from healthy fish stocks with higher OYs.

Expands the limited-entry permit system to include open access vessels.

Rewards successful fishermen with additional allocations in subsequent years while TIQ options do not.

Distributes allocations for overfished species equitably, while TIQ options disadvantage one group or the other.

Allows annual allocations for overfished species to be purchased by any permit within the composite commercial groundfish fleet, while TIQ options prevent this by confining trading of allocations to within a sector.

Eliminates 5 annual sector allocations and the gear switching issue.

The OSHUA plan is less expensive than any of the TIQ options, for both implementation and ongoing operations.