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RECEIVED

FEB 19 2016

PFMC

Pacific Fishery Management Council  
Don McIsaac, Executive Director  
7700 NE Ambassador Place  
Suite 101  
Portland, OR 97220

February 15, 2016

**Re: Agenda Item F.4 Recommendations for International Management Activities Including U.S. – Canada Albacore Treaty Area Fishery Update**

Dear Mr. McIsaac,

I am writing to you regarding the Pacific Fishery Management Council (Council) March 8 – 16, 2016 meeting agenda item F.4: Recommendations for International Management Activities including U.S.-Canada Albacore Treaty Area Fishery Update. As you are aware the Treaty, which has been in effect since 1981, represents an important and complex agreement between the United States and Canada concerning North Pacific Albacore and, among other things, establishes a reciprocal fishing regime with Canada. This regime terminates in 2016.

In 2011, the U.S. albacore industry raised concerns regarding economic impact of the Treaty on U.S. coastal communities and harvesters, overcrowding of the fishing ground, and the overall capacity of the Canadian fleet. To address some of these concerns two working groups were established at the subsequent negotiations: the Data Working Group and the Economic Working Group. As a result, these working groups provide important data on an annual basis, which informs the Council, the National Oceanographic and Atmospheric Administration (NOAA), the industry, and the Department of State on the impacts of the reciprocal fishing regime to the U.S. albacore industry.

The albacore industry has had a long-standing position that it is important to first review the data in order to evaluate the Treaty and make management recommendations. It has also been the common practice that the U.S. delegation to the Treaty, which includes the U.S. albacore fishermen, is consulted on the data as a preliminary step. As a reminder of this fact, enclosed with this letter is the American Albacore Fishing

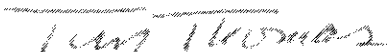
Association letter to the Department of State dated July 17, 2012, outlining these same concerns.

The industry, to date, has not received the 2015 data. Consequently, the U.S. delegation has not yet had the opportunity to consult on the results of the data, the termination of the fishing regime, or consider recommendations for next steps. The Council plays an important role in providing guidance and discussion on this topic. However it is our position that discussing the topic in a public forum before receiving and reviewing the data and before internal U.S. delegation discussions are held, would not be judicious and may inadvertently limit the potential options the U.S. industry will have in moving forward. Therefore, we respectfully request that discussion on this agenda item be limited to inquiring when the data for 2015 will be released to the Council and the stakeholders; requesting the appropriate agencies release the data to the stakeholders; and that a U.S. delegation meeting is scheduled in the near term to discuss the data.

If the Council agrees to this course of action, we would then respectfully also suggest that the Council take the corresponding action for the Treaty agenda item at the Council's Highly Migratory Species Advisory Subpanel.

We thank you for considering our request to refrain from Council deliberations on this topic until the data has been released, and until the U.S. delegation has had the opportunity to review and discuss the 2015 fishing data.

Sincerely,

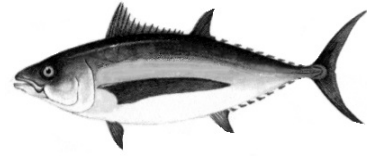


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Tim Thomas  
President  
American Albacore Fishing Association

CC: Heidi Taylor , NMFS  
David Hogan, U.S. State Department

# **WESTERN FISHBOAT OWNERS ASSOCIATION**



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February 16, 2016

Pacific Fishery Management Council  
Ms. Dorothy Lowman - Chair  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220  
Via Email: [dmlowman01@comcast.net](mailto:dmlowman01@comcast.net)

## **Re: Agenda Item F.4 Recommendations for International Management Activities Including U.S. – Canada Albacore Treaty Area Fishery Update**

Dear Ms. Lowman:

Upon reviewing the March council agenda it appears that there is an Action Item under Item F.4 To be heard March 12 - 0800: *“Consider Reports on International Activities and 2015 U.S.-Canada Albacore Fishery and Recommendations for the 90th Inter-American Tropical Tuna Commission Meeting and any Fishing Regime for 2017 and Beyond”*

The IATTC recommendations are something that requires the attention of the council given the IATTC meeting schedule. WFOA requests that the Council assign time for consideration of IATTC recommendations in the April 2016 council meeting agenda rather than at the March meeting. The issues concerning DGN and longline take up the vast majority of time allotted to the Council and advisory bodies. Holding off IATTC deliberations to April will allow greater focus on IATTC issues and also provide an opportunity to focus on contributions to the WCPFC - MSE workshop to be held in May.

On another issue, U.S./Canada Treaty, WFOA believes it is premature for the Council to take action. WFOA is currently polling its membership on what changes should be made to the treaty. During the past two seasons we have seen both better fishing in Canada with warmer waters, but unfortunately we have also had continuing issues with U.S. port access in Canada. WFOA is also concerned about long time Canadian fishermen who have been shut out of U.S. access because of the structure of the current Canadian permit process that seems to favor the larger more productive vessels.

WFOA believes the PFMC could provide useful input into the process by calling for more complete and timely data reporting by Canada for the past two seasons. WFOA believes a full review of all the data is required to enable a complete evaluate the Treaty and formulation of management

recommendations. It would also be helpful for the PFMC to help express our concerns regarding very minimal communication to constituents by the US government on treaty discussions between the U.S. and Canadian government that will be making any proposals for changes, extensions, or modifications to the regime. Many of our members fear an accommodation without proper review of all the information that may lead to unfavorable outcomes to U.S. fishermen.

The WFOA welcomes the support of the Council on international issues. For the U.S./Canada treaty the current default position is that the regime will be suspended indefinitely after the 2016 season unless industry requests otherwise. Council support in obtaining timely data and analysis of that data is most welcome as this will be valuable should the U.S. and Canadian governments enter into negotiations on the Treaty.

Thank you for the consideration of our view and Council efforts in support of U.S. fishermen in the international management.

Sincerely,



Wayne Heikkila  
Executive Director

cc: Dr. Don McIssac - Executive Director PFMC  
Heidi Taylor - NOAA/NMFS  
David Hogan - US Department of State  
Doug Fricke - HMSAS  
Cyreis Schmitt - HMSMT