

WEST COAST SEAFOOD PROCESSORS ASSOCIATION

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March 30, 2016*

Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Dear Chair Lowman:

The following comments are submitted by the West Coast Seafood Processors Association (WCSPA) as public comment relating to Agenda item C.3 – *Catch Share Program Review: Comments on National Guidance and Preliminary Plan for West Coast Trawl Catch Share Program Review*.

WCSPA represents shoreside processing companies and related businesses located in California, Oregon and Washington. Our members process about 80 percent of the groundfish landed on the West Coast, and many of them have been greatly affected by the West Coast groundfish trawl catch share program. Because we believe the national guidance regarding catch share program reviews will remain in flux for several months, our comments at this time focus on planning for the upcoming review of the groundfish trawl Individual Quota (IQ) program.

We are eager for the review to begin because the sooner the catch share program is thoroughly analyzed, problems can be recognized and solutions can be developed and implemented, the sooner the groundfish trawl fishery can reap the economic benefits that have been promised – but have never been realized – under the IQ program. This does not mean we should focus on only one or two high profile areas, nor does it mean we should hurry through the review. On the contrary, we believe a thorough review and analysis, combined with a commitment from the Council and NMFS to enact the resulting recommendations, will help resolve many concerns fishermen and processors have about the groundfish trawl IQ program.

Commitment to Follow-up

It will be critical for the Council to commit, early-on, to developing a follow-up management action to address the recommendations resulting from the trawl IQ review. While preliminary discussions about the review have suggested the Council could begin considering revisions to the IQ program in June 2018 (as part of the omnibus prioritization process), we believe the Council should commit **now** to prioritizing a management action dedicated specifically to addressing the review recommendations as soon as they are finalized. This issue can certainly be anticipated as the priority for groundfish management in 2018; in fact, it is the priority for groundfish management **now**. Making this commitment early-on will allow for some preliminary steps to start developing the follow-up action during the final phase of the review process, allowing for a more expeditious transition into the next phase – the management response. A formal commitment will provide some comfort to the industry by sending a clear signal the Council and NMFS are serious about following up on the recommendations resulting from the review as quickly as possible. This may also increase industry interest and participation in the review process itself.

Review Timeline and Process

WCSPA recommends the Council establish a clear and detailed timeline for the review, highlighting opportunities for public input and identifying milestones for interim reports, presentation of recommendations, and Council follow-up action. Both the public and managers should be made aware of the timeline up-front so as not to create false expectations about the process and to ensure adequate time can be spent preparing the information and analyses necessary for an effective review. A clear timeline will also help the Council make decisions regarding staff workloads and the allocation of available resources as the review proceeds.

We anticipate the trawl catch share program review will be widely-publicized, transparent and all-inclusive, and we urge the Council to provide as much opportunity for input and feedback from affected parties as possible. We were encouraged by the discussions at the recent catch shares workshop in Portland, OR (“Santa Rosa III”), and we hope the Council will consider the report from this workshop as a good starting point for further discussions with affected fishermen and processors. We suggest the Council cast a wide net when seeking input, as many of the people who have been most affected by the catch share program are not those who regularly participate in the Council process and/or attend Council meetings. Furthermore, we encourage the Council to seek input from all affected parties during the drafting of interim reports and prior to the completion of the final report.

The trawl IQ review process should begin with a thorough and critical evaluation of the program relative to the goals and objectives set forth in Amendment 20 to the Pacific Coast Groundfish Fishery Management Plan. This approach should help identify which elements of the trawl IQ program have been effective and which elements have failed in achieving the stated objectives. The process should then focus on addressing and correcting the elements that have failed. We also recommend the review process include a comprehensive evaluation of the monitoring programs currently required under the program. The industry is now incurring significant costs associated with observer coverage, dockside monitoring, and electronic monitoring. It will be important to understand specifically how the data collected by these monitoring programs are being utilized to support the IQ program and enhance groundfish management in order to determine whether the benefits of collecting the information outweigh the costs. With this analysis, the Council can consider ways to streamline monitoring requirements, thereby increasing efficiency and reducing costs.

Community Advisory Body (CAB)

Amendment 20 notes that the Council will form a *community advisory body* (referred to as CAB in the April 2016 Situation Summary) to better understand and address concerns related to communities affected by the trawl IQ program. WCSPA supports the involvement of an advisory body, and we urge the Council to ensure a wide diversity of interests is represented on the CAB. Unlike the Groundfish Advisory Subpanel (GAP), however, membership on the CAB should not include every interest associated with the West Coast groundfish fishery, but rather, should be inclusive of only those parties that are directly affected by the IQ program, i.e., groundfish fishermen, processors and other related businesses in fishing communities along the West Coast. This is consistent with the approach the Council took when it formed the Trawl IQ Committee to provide input during the development of Amendment 20.

Even when limiting membership on the CAB to only those parties directly affected by the trawl IQ program, it will be challenging to ensure the diversity of perspectives needed during this review is adequately represented. Doing so will require inclusion of ***multiple fishermen and processors*** from a number of fishing communities. We note that some impacts have been experienced differently in the northern and southern regions of the groundfish fishery; therefore, it will be important to include

representation of fishermen and processors from both northern and southern areas to gain a more comprehensive understanding of the full range of fishery and community impacts.

We hope the CAB will be formed as soon as possible so this group can be engaged in the review process from its onset. The CAB may be particularly helpful in providing perspective on whether the trawl IQ program has met its goals/objectives. Through this process, it may also be useful for the CAB to identify some general performance metrics that could be evaluated relatively easily at the onset of future catch share reviews, especially if the Council intends to review this program every four years after this initial review, as the language in Amendment 20 suggests. There is no need to “reinvent the wheel” every time the catch share program is reviewed; the initial review should serve as an opportunity to develop a checklist of indicators or performance metrics to facilitate and streamline future reviews.

Outside/Independent Reviewers

At the April 2016 meeting, the Council should discuss the composition of a technical workgroup for the trawl IQ review and determine whether funding exists to contract outside expertise to participate on the technical workgroup. There may be cases where the expertise to review particular program components lies outside existing NMFS or Council staff resources. If resources are available, the workgroup should be augmented with academicians, consultants, or other expertise as necessary. Often, a review of complex problems such as those associated with the trawl IQ program can benefit greatly from a fresh perspective from an outside or independent source. Incorporating outside reviewers will also help to reduce workload demands on Council and NMFS staff and provide some staff time to begin preliminary work on developing the Council’s follow-up management action.

Thank you for your attention to this important issue and your consideration of our recommendations. We assume that this is the first of many opportunities for public input regarding the trawl IQ review, and we look forward to providing additional comments on many other aspects of the review. We are eager to work with the Council and NMFS to ensure this review is effective in addressing the existing problems in the Pacific Coast groundfish fishery.

Sincerely,

A handwritten signature in cursive script that reads "Lori L. Steele". The signature is written in black ink on a white background.

Lori Steele
Executive Director