



**Da Yang Seafood Inc.**

Seafood Processing & Trading

March 10<sup>th</sup>, 2010

Dear Council Members,

Thank you for the opportunity to provide our perspective on the groundfish rationalization process. We are writing to object to any proposed alterations that include processor shares or processing rights granted through historical landings.

I am writing on behalf of Da Yang Seafood, a small processing plant in Astoria. We started participating in the shore-side hake program in 2006. We are a small hake processor in Astoria. Our products include frozen HGT and whole round whiting and our markets are based upon exports to China, Europe and Russia.

As a small processor, we must be creative in our marketing and production techniques to ensure our niche market for hake overseas. It has given us an opportunity to continue our investment and our operation in Astoria and help promote the local economy.

The addition of the whiting production has extended our plant season from 3 months to 4 months out of a year, including our sardine production. Two whiting vessels deliver to our plant and we employ over a hundred workers in our processing plant. In early 2007, we continued investing in our plant and upgrading our production capacity to meet the needs of our global customers.

Fisherman benefit when new processors enter the market participating against the bigger players and competition between processors to buy fish from fishermen is an essential component to the success of our fishery – at all levels. Any exclusive grant to a processor to buy hake will stifle competition, limit advancements in technology and product forms and drive down the price to the fisherman - as such an arrangement have done in the Alaska crab fishery after implementation of a “two pie system.” We strongly oppose any plan which includes such an element.

However, in the event that the Council includes some type of processor allocations or rights as a component of the alternatives, we request that (1) a significant portion of the allocation (>25%) be available on the open market without restrictions allowing new processors to enter

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the fishery and buy hake, and (2) that any qualifying period for shore based processing include the years 2006, 2007, and 2008.

Thank you for your consideration of these issues.

Sincerely Yours,

*Chih Yuan, Wang*

President and CEO



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March 24, 2010

Mr. David Ortmann, Chairman  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220-1384

Re: Clarifications Requested of Council, Deadline for co-op fishery declarations & permits, Issue #7

Dear Chairman Ortmann and Members of the PFMC:

On behalf of the whiting mothership *Golden Alaska* and the whiting catcher vessels *Pacific Challenger*, *American Beauty*, *Ocean Leader* and *Aleutian Challenger*, we write this letter in support of Option B (NMFS preferred) which establishes the most appropriate deadline for a co-op permit and for a MS/CV endorsed permit to declare into a MS co-op or the non co-op fishery.

As provided in both option A and B and consistent with Council action, it is reasonable for whiting catcher vessels in the MS/CV sector to declare their intent to participate in either the co-op or non co-op fishery during the period of September 1 to December 31 of each year for the following season's fishery. However, for reasons stated below, it is not reasonable to require CVs to register for a co-op permit during the same September-December time period. The timing is much better for both management and CVs to register during the NMFS preferred period of February 1-March 31:

- Under rationalization, the fall season will be increasingly important as a time period to conduct the CV/MS whiting fishery. As we all know, the fall season of September-December is the period of highest whiting quality and meat yield which provides maximum economic return per fish caught and processed. The fall season is also most favorable for low rockfish and salmon bycatch rates. The important fall season fishery should be concluded before CVs are required to register for the next season's co-op.
- The February 1-March 31 registration period will provide CVs an opportunity to evaluate the past season's results and make proper arrangements for the next season. This timing will not cut short planning and will result in a minimum of problems that will occur if CVs are forced into making market choices for the next year before the current season is concluded.
- The February 1-March 31 co-op permit registration period provides plenty of lead time prior to the May 15 start of the fishery and also provides the industry with more information on the upcoming season's OY than would be available during the prior September-December period.

We thank you for the opportunity to provide these comments in support of Option B.

Sincerely,

NATURAL RESOURCES CONSULTANTS, INC.



Steve Hughes  
President