



## **WESTERN FISHBOAT OWNERS ASSOCIATION**

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October 13, 2011

Dr. Don McIsaac - Executive Director  
Pacific Fisheries Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220-1384

Re: HMS Framework Management

Dear Dr. McIsaac:

Western Fishboat Owners Association (WFOA) submits the following thoughts on the concept of what might be some elements of a "management framework" for albacore tuna. The 2011 stock assessment indicates that the North Pacific albacore resource is near long-term average abundance, and likely to remain there, at current levels of fishing effort. We believe we have adequate time to develop reasonable management framework options that are beneficial to the west coast albacore fishery which take into account the international and highly migratory nature of the albacore. This is an opportunity for the PFMC to work with all the other councils, RFMO's, and industry to implement a plan that is beneficial for the U.S. albacore fisherman and the U.S. consumer.

Over the past decade WFOA has seen the fleet size and effort already significantly decrease because of the aging of the fishermen and their vessels, a decrease of port infrastructure, the timing and markets of other fisheries, and a general lack of interest to pursue albacore tuna by many who had fished in the past. This season is a perfect example. Ex-vessel prices for the product increased by 40% -100% over 2010 due to a weak dollar, earthquakes, and worldwide and domestic demand. However, environmental conditions along the west coast not were not conducive for a productive troll fishery in 2011. The net result was that effort was again reduced from 2010 and previous years.

One would think that the higher ex-vessel prices would result in more effort from the coastal U.S. fleet. Remarkably, this was not the case in 2011. At this time without further research, we speculate that the reduced effort may be due partially from the aging fleet and the fact that the albacore fishery is conducted farther offshore in which seasonal wind patterns that make seas rough and fishing difficult for smaller boats much of the time. Older fishermen with older vessels are not willing or able to endure the physical effort required. Other factors influencing the decision to fish albacore are a re-opening of coastal salmon fisheries, improved shrimp harvests, and a good crab season last winter.

All these factors, while not based in science, influence effort in the albacore fishery probably more so than other factors. Thus, any consideration of a future management framework should take those factors into consideration. Economic Surveys such as the one presented to the PFMC in April 2011 by Lisa Wise Consulting can do a lot to fill this informational void and should be thoroughly considered.

Since the 2011 Albacore Stock Assessment looks favorable at least for the next few years. There does not appear to be any reason to rush the development of a management framework. Implementation of drastic and unreasonable measures would only further hamper a fleet already facing new international one size fits all regulations. The international RFMO's with a focus on purse seine issues and the politics of the numerous Pacific Island entities has put in effect (CMM's) that are based on that gear type and vessels 100 times larger than your normal U.S. artisanal albacore troller. We are caught in the middle of issues such as vessel markings and VMS which make it increasingly difficult for the U.S. fishermen to compete with larger foreign vessels fishing the North Pacific Ocean.

The VMS issue alone has severely restricted the U.S. albacore troll fleet from exploring west of 150W longitude in areas that were very productive in the past. The cost, expense, and hassle are not worth it for many of our small family operated vessels. This is a shame, as it leaves a vast area open to IUU fishing with only the occasional overflight observing that effort. The PFMC should support fair and equitable reporting requirements through VMS that take vessel size, capacity, and effect on the stocks into consideration, and recognize that current management practices allow for full reporting of catch, effort, and location of catch.

Some factors that should be considered in the near future keeping in mind that any regulations and management measures placed on the U.S. fleet absolutely needs to be multilateral in nature are;

1. The U.S. could also be the leader in determining biological reference points (BRP's) for North Pacific albacore if countries feel the need to not use the temporary 10 year measure now in effect. The PFMC should work with the international process to develop fair, reasonable, and long term BRP's based on sound science.
2. The HMSAS and HMSMT teams also should be tasked on researching the definition and application of "artisanal" in determining fleet dynamics in the US. If Japan can claim they have an artisanal fleet in the 1000's that could potentially be exempted from a number management measures then it should be equally available for the U.S.
3. Continued vigilance from enforcement and management bodies to identify and enforce IUU fishing and their markets. Even though the IUU fishing occurs usually far from shore, in the North Pacific the vessels eventually have to unload and market their catch in some port in some country. More effort from enforcement should be directed at the sales, marketing, and consuming of the illegal product as a way to control the harvest.

Also, given the amount of tonnage the Canadian fleet extracts from the U.S. EEZ compared to what the U.S. takes out of the Canadian EEZ, the U.S. /Canada Albacore treaty has potentially reached a point where changes need again be considered. The next round of negotiations begins in December 2011.

Presently;

- Canadians are allowed 110 vessels in US waters during July through October, and have landing privileges in six U.S. ports of Bellingham, Westport, Astoria/Ilwaco, Newport, Coos Bay, and Eureka. U.S. vessels similar access and port privileges in Canada.
- In the past 10 years U.S. effort in Canada has been very little compared to Canadian effort in the U.S.
- A large percentage of Canadian Landings are caught in U.S. waters, and account for more than 1/3 of total North American landings.
- Crowding and aggressive operations on the grounds is a present and growing problem that has not been resolved.
- Almost all Canadian caught albacore in U.S. waters is landed in Canada with little benefit to U.S. ports and businesses. In today's market if 4,000 tons are caught in U.S. waters and delivered in Canada that is a \$20 million outflow that does not benefit U.S. ports or processors.
- Canadian fishermen with the exception of those landing in the U.S. pay no fees directed at research and science, but use the information collected by U.S. research to justify eco-certification, and promotion of their product in North America.

Given that RFMO's such as the Pacific Fisheries Management Council at the Federal Level and the IATTC and WCPFC at the international level are now looking at ways in the future to control, cap, or reduce effort through management framework plans, a place to begin would be to eliminate foreign fishing in the U.S. EEZ for albacore tuna. Therefore, given the above points, the PFMC and its advisory bodies could play a role in collecting data which could be utilized by the U.S. delegation to the Treaty negotiations. Some information, data, and discuss should therefore be but not limited to:

1. Compare 2011 Canadian fleet capacity and vessel size to what it was in 2001.
2. Determine the amount of albacore caught by Canadians in US waters being landed and sold in Canada compared to the US from 2001 - 2011.
3. Research tonnage landed and unloaded by Canadian vessels in the US that are actually sold and transported to Canadian buyers.
4. Research potential effects of treaty changes such as reduced area of the treaty, reduced length of season, reducing the number of vessels allowed in the U.S. waters, and if the U.S. fleet would make up the difference in tonnage.
5. Discuss whether a council recommendation to the U.S. Dept of State to issue a letter of termination by December 31, 2011 would give the U.S. a forceful negotiating tool.

The U.S./Canada albacore treaty was promoted by U.S. albacore fishermen and put into force in 1981. Termination or major changes are very serious issues with many opinions on both sides. It could be a very useful tool in international management and research if the correct approach is

taken. However, more and more U.S. albacore fishermen think they get very little benefit any longer from this agreement as it stands. WFOA recommends the PFMC be involved in a serious discussion about this issue with west coast albacore fishermen.

Thus, in the large picture of international management of HMS, WFOA remains somewhat hesitant to promote the “framework” route but feels many options should be explored. Also, if the next assessment is similar or higher than the 2011 assessment, then does the PFMC or U.S. government find ways to promote its’ own fishery and fishermen? For too long all management bodies have been programmed to react to the “crisis”, but never to react if there are positive developments. For the PFMC, this is a unique opportunity to be ready for any negative issue but also be aware of a clean productive fishery and what can be done to more enhance and promote it for future generations and for the consuming public.

Sincerely,



Wayne Heikkila  
Executive Director

cc: WFOA Board of Directors  
Dave Hogan, U.S. Department of State  
Mark Helvey, NMFS