

August 19, 2004

Dr David Hanson
Chair of the Trawl IQ Committee
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220



Agendum C.11d
Public Comment
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PFMC

Dear Dr. Hanson:

The Council took an important step forward when they began the process of examining how an individual quota system could promote both the biological and economic health of our West coast trawl groundfish fishery. Studies of IFQ programs from around the world have shown that a properly designed system can enhance safety, increase the value of fishery products, reduce discards and bycatch, increase the availability of fresh seafood, improve fishing industry profits, and provide for effective harvest capacity management and sustainable fisheries. IFQs contribute to safe, stable jobs that pay living wages. They are a crucial part of a rational fishery.

We have a chance to realize these benefits in our trawl groundfish fishery, but only if all stakeholders work together in developing and discussing alternatives in a rational, analysis-driven process. As harvesting sector representatives of the Trawl Individual Quota Committee, we are committed to working with our colleagues representing the processing sector, conservation groups, and coastal communities to properly and effectively evaluate alternatives and provide advice to the Council on designing an IFQ program that balances the needs of harvesters, processors, coastal communities, and the resource. To this end, we propose that:

- The decision rules of the Trawl IQ Committee be changed so that all Committee recommendations are developed through consensus rather than by voting. If, after full deliberation, consensus is not reached, the Committee will provide the Council with position statements that identify each group's key concerns and rationale for their position, and discuss why consensus could not be achieved.
- The Council's IQ analytical committee be requested to outline what information is needed, and whether this information is available, so the impacts of a full range of harvester/processor initial harvesting quota allocation options can be assessed.
- We meet informally with processors, conservation and coastal community interests prior to the next Trawl IQ Committee to discuss what each sector believes to be essential sector-specific objectives achieved from an IQ program, as well as to discuss information that could be made available to the analytical committee to assist in their impact analysis. We hope that such a dialogue could help us focus our discussions on the relative benefits of alternatives when we next meet as a Committee. Understanding and clearly defining

these objectives – including those that may be conflicting – will aid in understanding the trade-offs between alternatives currently under discussion as well as designing new alternatives that may better address specific concerns.

We are committed to doing our part in developing an IFQ program that best meets the unique needs of West coast harvesters, processors, coastal communities, government managers, and, most importantly, the resource. We support funding this initiative, because adequately funded analysis is a critical component of our ability to fully discuss trade-offs between alternatives and provide reasoned advice to the Council. We believe it is imperative for all the stakeholders in the west coast trawl groundfish fishery -- the harvesters, processors, the coastal communities, environmental groups, and fishery managers -- to work cooperatively towards improved fisheries management. A safer, more profitable, and better managed fishery is possible, if only we can all work together.

Sincerely,

Steve Bodner
Chris Garbrick
Alan Hightower
David Jincks
Marion Larkin
Pete Leipzig
Brad Pettinger
Rich Young

cc: Don Hansen, Chair, PFMC
Don McIssac, Executive Director, PFMC
Other members of the Trawl IQ Committee
Steve Freese, NMFS, NW Region
Dr. Bill Hogarth, Assistant Administrator for Fisheries, NMFS, NOAA
West Coast Congressional delegation