



**WESTERN FISHBOAT
OWNERS ASSOCIATION®**

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RECEIVED

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PFMC

Mr. Donald K. Hansen, Chair
Pacific Fishery Management Council
7700 N.E. Ambassador Place, Ste 200
Portland, Oregon 97220-1384

BY FACSIMILE ONLY TO 503-820-2299 - NO ORIGINAL TO FOLLOW

Dear Don:

I have recently received a copy of Rod McInnis' July 22nd letter to you as Chair of the PFMC. As the Executive Director of the Western Fishboat Owners Association, I thought it would be important for you and the Council to know the views of our albacore fishermen concerning the Resolution on albacore passed by the Inter American Tropical Tuna Commission at their June 2005 annual meeting. I have attached a copy of the Resolution for your information.

As you can see from the Resolution, there has been no Pacific wide total allowable catch (TAC) set by the IATTC, nor even one for that part of the North Pacific east of 150 degrees west, (the general area of the IATTC's management concerns having to do with albacore.) Likewise, there has been no international agreement as to whether to approach a cap on effort with effort or catch controls, (although the resolution talks about effort remaining at current levels, not necessarily catch). We were concerned that the statements in Rod McInnis' letter that "As the Council begins to address how to maintain North Pacific albacore fishing levels, it will need to determine how best to achieve this by use of either effort or catch controls. It is my understanding that Canada may be looking at total allowable catch as the mechanism they will use for implementing the resolution," might be misinterpreted as a call to the Council for some action in this regard.

Since the letter was written we have received assurances from Rod that his letter was not a call to action, but only meant to have the Council begin to think "about how they will be engaged in shaping the domestic management measures by which NOAA will implement the IATTC agreements." He did not believe his letter could be interpreted "as directing the Council to consider a limit on albacore catch for the US vessels to the exclusion of other means of capping participation in that fishery. Also, I did not set a timeline for Council actions."

WFOA explained to the U.S. Delegation that we did not want specific control language set forth in the IATTC Resolution. This was also reflective of the similar concerns expressed by the Council, the

HMS-AS, and the General Advisory Committee to the U.S. Section of the IATTC, that the U.S. albacore troll fleet might be limited before those of other nations were similarly regulated. We also explained to the U.S. Delegation and the U.S. Section why we did not think it necessary or advisable to put any Council imposed cap on U.S. albacore troll fishing effort whether it be a limited entry system or some self imposed TAC. To reiterate, the U.S. Pacific albacore troll fleet is contracting, not expanding. Older fishermen are leaving the fishery or dying, with no younger replacements such as their sons. It has been ten years since a new albacore troll vessel has been built. The price for troll caught albacore has hardly increased over the last 15 years (adjusted for inflation), and yet the cost of fuel and liability insurance for the vessels has doubled and tripled. Economic studies done in preparation of the HMS FMP tell the same story. The U.S. fleet is contracting when it should be expanding to maintain the traditional U.S. share of any TAC based on historic catch levels.

Finally, as was testified to both the Council and the HMS-AS, the problem we were and are attempting to fix --- that of the Asian fleets hitting the albacore stocks too hard in the western north Pacific before the fish get to the eastern north Pacific where the U.S. effort is concentrated --- has a few more steps to be taken. Primarily, (1) the U.S. becoming a member of the Western and Central Pacific Fisheries Commission; (2) the WCPFC establishing the Northern Committee; and (3) some agreement among the members of the Northern Committee to not expand effort and/or curtail effort, in the western North Pacific.

Given the other HMS issues the Council has on its plate such as the drift gill net fishery and off-shore long line fishery, we at this time see no need for Council action on the albacore fishery

Sincerely



Wayne Heikkila
Executive Director

cc Dr. Fox
Mr. McInnis
Mr. Helvey
Mr. Gibbons-Fly.