

Subject: [Fwd: Newport Shrimp Producers council letter] BB Comment
From: "pfmc.comments" <pfmc.comments@noaa.gov>
Date: Wed, 26 Aug 2009 08:27:35 -0700
To: Jim Seger <Jim.Seger@noaa.gov>
CC: John Coon <John.Coon@noaa.gov>

Subject: Newport Shrimp Producers council letter
From: Nick Edwards <fisherman97420@hotmail.com>
Date: Tue, 25 Aug 2009 14:27:21 -0600
To: pfmc.comments@noaa.gov

Newport Shrimp Producers

Mr. Chairman;

My name is Nick Edwards I am representing the Newport Shrimp Producers. I have participated in the Oregon Pink Shrimp industry for thirty years. I have been actively involved in seven different West Coast fisheries during my career. Fifteen years has been in the West Coast ground fish trawl fishery. The commercial fishing industry is the career path I have chosen. I have testified before the California Fish and Wildlife Commission and Oregon Dept. of Fish and Wildlife. This is the first opportunity to voice my concerns before the Pacific Fisheries Management Council. I have represented my industry, both shrimp and crab at supervised negotiations, with processors and the Oregon Department of Agriculture.

Newport Shrimp Producers are the largest shrimp association on the West Coast. We have been representing the West Coast shrimp industry for over fifteen years. Our membership has participated in many trade shows both Domestic and International.

The West Coast Fisheries are in a new risk adverse era. The impacts from the spillover from trawl rationalization will have negative effects on all West Coast Fisheries. How does the council prioritize which fisheries to be economically viable? The EIS (economic Impact Study) is very controversial depending on which state and federal fishery you participate in. In the EIS document Chapter 4 pages 396-404 talk about impacts to non ground fish trawl commercial harvesters (crabbers, shrimpers, Fix Gear). The EIS is in serious question regarding the economic impacts of these different state and federal fisheries.

The ground fish buyback program was implemented in 2003, in Sept 8 2005 the repayment for the buyback started in the shrimp industry. Since that date, my vessel F/V Carter Jon has paid \$70,338.44. My business has personally paid for fleet capacity reduction in regards to Pink Shrimp Fishery. Oregon has averaged forty four vessels in the shrimp fishery since the buyback was imposed. MSC (Marine Stewardship Council) was achieved with a low capacity level of forty five vessels. MSC has awarded pink shrimp a sustainable fishery. The spillover from Trawl rationalization will jeopardize our MSC certification.

The EIS document Chapter 4 page 305 under vessel monitoring cost; it states that "if

at sea monitoring cost for vessel at \$350 per day, this will tend to reduce the ground fish fleet from 40-60 vessels". Because of attrition from the ground fish trawl fishery, ground fish trawl vessels will be forced to enter the shrimp fishery. The infrastructure for the shrimp industry has changed dramatically since buyback inception. The Processing sector has lost half of its processing capacity. There is no longer the economic infrastructure for the fleet to double. We, the Newport Shrimp Producers want to voice our concerns that are real and readily apparent.

Therefore we formally ask the council to go on public record and acknowledge the severe economic impacts that trawl rationalization will have on the West Coast Shrimp Industry. This recognition from the council is needed to start a movement to find solutions to provide economic stability in the Oregon Pink Shrimp Fishery.

Respectfully submitted

Nick Edwards

F/V Carter Jon

Secretary Newport Shrimp Producers

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Newport Shrimp Producers council letter.eml

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AUG 25 2009

PFMC

August 17th 2009

Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Re: Amendment 20, Trawl Rationalization, Individual Fishing Quotas

Dear Mr. Chairman:

We are a coalition of Ground fish Trawler's, Shrimp Trawlers, Crabbers, and Business owners. We rely on the economic stability for our west coast fleet, we are the residents and permit holders from the port of COOS BAY, ORE; our home fishing port. It is with grave concern that we are writing to inform you about the severe economic impacts of Trawl Rationalization on our individual businesses. Unfortunately, the permit related information that gives rise to our issues with Trawl Rationalization was not available to us during the public debate and decision making process of the Council. Had it been available when it was developed by Council staff, or when it was repeatedly requested by many in the industry, permit owner interest in moving forward with the plan would have differed substantially.

We share the Council's desire to improve resource management and are willing to continue to work towards that end. However, we do not support moving forward with the scheduled, January 1, 2011, Non-Whiting Groundfish Trawl Rationalization. Economically, it is a significant step backward from status quo. Quite different than we were led to believe. We have been repeatedly advised by those representing us at the Council, that, with the equal allocation and permit history allocation formula, we would have increased economic opportunity. In fact, the opposite is true.

That is why we are asking this Council to offer a referendum vote on this action. And, in the interim, take action to immediately suspend further Council staff and NMFS resources and effort until that vote is taken. If taking this extra step to hear new concerns, created with this new information, results in some interim steps or even if after all is discussed, Council moves forward as previously decided, then delay and further debate is not only reasonable, it is necessary.

So, we include for your review a few of our specific business concerns:

- The public process was completed without information that would have materially influenced the debate while it was occurring.

Nearly every active permit is being forced to lease or purchase quota to maintain their current business opportunity; this includes those permits with the best available history. This was not the prevailing understanding during the process. It was widely understood that there would likely be winners and losers, it was never expected or represented that all would be losers with the change.

- The Council has moved forward without a full review of a economic impact statement on the adverse affects of all Fisheries both state and federal directly effected by the proposed IFQ program.
- The Trawl rationalization program is going to have a direct impact on Oregon's pink Shrimp fishery. Increased effort shift, will occur potentially doubling the fleet. This will jeopardize Oregon's MSC certification. The MSC label was achieved with a low capacity of forty five vessels. The MSC label is a marketing tool to market Oregon pink Shrimp in the E.U.
- The spillover to various State and Federal fisheries is very concerning to fisherman who have already paid for capacity reduction thru the 2003 Buy-back plan. To maintain current opportunity, vessels will all have to buy or lease substantial amounts of additional quota.
- Now that we have had opportunity to review the economic impact to all of our individual businesses, it is clear that the program is not viable for any of us.
- We clearly understood the program is designed to rationalize the fleet; what we didn't know was that we were the ones that would have to pay for it, just to remain viable. Not that we would have diminished opportunity with an opportunity to "buy back" to our current levels of opportunity.

The West Coast Fishing Industry is at stake. It is imperative that the Council consider our requests.

Sincerely *Nick Edwards F/V CARTER JON*

Permit Owner Signatures by Port