

## Trawl IQ Program & Southern Blackcod

To: PFMC Council Members,

My name is Barry Cohen

1. I have been both a Processor and Trawler since 1965. So I understand the issues from both perspectives.

2. I was on the Gap when the discussions took place with the council for a "Trawl IFQ program". **These are the points that were agreed upon:** This was a **Trawler/Council management program** where the Council set the **"Specie Caps" (which were established to prevent unfair competition or any kind of monopoly)** and the **"Yearly Harvest Limits"** then the Trawlers would **"self manage"** our fishery with a minimal amount of **discards and waste.**

**These were the Trawlers' benefits:** The trawlers **could catch their quota whenever they wanted, they could catch their quota with whatever gear they chose so long as it was legal, and the trawlers could trade, lease or sell their quota so long as the trade, lease, or sale was legal.**

For these benefits the Trawlers agreed to allow the council to **track their daily take of fish to insure no unreported waste or illegal activities.** (Observers, at sea and unloading).

3. Now for the Southern Blackcod: In 2002, the surveys were extended coastwide and included the "southern blackcod". The scientists found that the "Southern" Blackcod were genetically the same as the "Northern" Blackcod and so the two Blackcods were the same specie and Blackcod are migratory. So after learning those facts, we should have faced the reality that the 36 line is now only an unnecessary burden on the Trawlers. **There is no Biological or Scientific reason NOT to eliminate the Blackcod 36 line.**

**\*\*Today there are approximately 750 tons of "dormant blackcod quota" south of the 36 Line because there are not the fishermen to catch the quota. If the 36 Line were to be eliminated it would allow the "dormant blackcod quota" to be available to the Trawlers that need blackcod to catch their full quota. I believe the Council has an obligation to do what's best for the trawlers and that's to help them, where possible, to maximize their ability to catch their full quota. The Council should, where possible, remove all restrictions preventing the trawlers from maximizing their legal catch. As they "Expect the Trawlers" to do their best to minimize "Waste and Discards".**

Another factor the Council must consider is what and who depends upon the good health and survival of the Trawlers: The processors, the fuel facilities, ice houses, gear, equipment stores, all the related workers, the tourism, etc., in fact the health of the coastal communities as a whole have a stake in the health of the Trawlers. The Trawlers are the "backbone" of a healthy fishing community.

**In Conclusion: I believe:**

**i. The 36 line should be removed for "southern" blackcod..**

**The Trawlers will get more "Much Needed" Blackcod. Also of importance is the law that applies to the removal of the 36 Line. "(vii) (A) Reallocations: (2) (ii) A person holding QS or IBQ in the newly created area will receive the same amount of total QP or**

**IBQ pounds as they would if the areas had not been combined.** In summation, Your QP (Quota Pounds) will stay the same if the 36 Line is removed and the trawlers will have access to "**More Blackcod**".

ii. If a trawler wants to use any legal method to catch his quota he should be free to do so (as was initially agreed).

iii. If a trawler wants to sell, trade, or lease his quota or any part of his quota to any other legal gear type fisherman, he should be free to do so.

iv. This should always remain a Trawl IQ Program as it was meant to be.

\*\*\* v. The Council and/or NMFS should Enforce the Regulations associated with the IFQ program. ie. No One Entity or Person Can Own Or Have "Control Over" More Than One Cap Of Any Specie!!! No Games Or Legal Maneuvers Should Be Allowed. (ie. Several Corporations Under ONE Control.) This would destroy the whole "Spirit" and "Fairness" of the IFQ Program and would untimely put an end to the "Independent Trawlers".

There are only a few Trawlers and one or two Processors that say there are "Big Problems" with the IFQ Program.

One being "Gear Switching". Yet when I ask them what's the "Big Problem" with Gear Switching, I have not heard one legitimate explanation. That's because there are simple solutions to these "Big Problems" that the industry can fix themselves.

The majority of Trawlers would rather have the Program "as is" rather than one with "New Fishing Regulations"! I now believe these Trawlers are "Pressured" or "Forced" (By the LEGAL OWNER or PROCESSOR to say there is a "Big Problem" with Gear Switching). I can not see any other reason why a Trawler would vote against his or her own "best" interest!!!

The second "Big Problem" is that some Processors say they are not getting enough bottomfish. Well, I was a Processor since 1965 and I needed more bottomfish many times. Did I go to the Council to complain? No! I fixed the "Big Problem" by offering more money or helped the Trawlers' needs in many other ways. One easy example with this alleged "Big Problem" today is that the Processor could help "The Trawler" buy more Blackcod Quota. And the Processor would get his "more bottomfish". That's Called Self Management!!!

Let's face it. These are normal industry problems that should be "worked out" by the industry. Not the Council.

To the Trawlers: This is a "Fishery Managed Program". If we give away any benefits, we will never get them back and we will, again, be "Managed By The Council"!!!

If we don't manage our own Fishery and ask the Council to manage it for us, then we the Trawlers, have "Lost Our Minds"!!!

When we see an efficient and healthy trawl fishing industry that has close to zero waste, is well managed, and the Trawlers make a fair profit; then the Council has done its job well with the Trawlers, the pot fishermen, the Processors, the other shore side facilities, and the communities.

Thank you for your time and consideration,  
**Barry A. Cohen**