



**Joint Protocol Committee of the NPFMC and Alaska BOF
Area O Pacific cod proposals 12, 13, and 14**

October 2018

Freezer Longline Coalition

Who we are

- 11 Alaska and Washington-based members, including family-run businesses and CDQ organizations committed to sustainable harvest and protection of the Pacific cod resource.
- FLCC: Voluntary cooperative of 23 active vessels (2018; 36 permits) that almost exclusively target Pacific cod in the BS and AI.
 - Coop established in 2010; 35+ years of history in fishery.
- In 2017, FLC members employed over 1,700 full time workers (in FTEs) in Alaska and Washington.

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- Alaska connections with FLC members:
 - FLC vessels between 33%-100% Alaskan-owned: 14
 - Members with 33%-100% Alaskan ownership: 5 (of 11)
 - Members w/Alaskan partners in fisheries: 11 (of 11)
- Annually, nearly 100% of landings are in Alaska, all of which is assessed a 3% fishery resource landing tax and a separate seafood marketing assessment (0.5%).
 - In 2017, ~\$2.75 million contributed by fleet to State of Alaska for Pacific cod harvest
 - 98% of 251 m lbs x \$.32 (state avg ex-vessel value) x .035%

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- Examples of FLC member investments in Alaska:
 - CDQ groups: Economic development and education resources in western AK communities
 - Prowler Fisheries: Arctic Prowler constructed in Ketchikan, AK; completed in 2013
 - Clipper Seafoods and Siu Alaska: Cod oil processing facility in Dutch Harbor
 - Alaskan Leader Foundation: Grants for rural Alaskan communities in Kodiak, Bristol Bay regions
 - FLC: Partnerships with NMFS on research to better understand Pacific cod stocks, e.g. genetics research

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- Commitment to sustainability
 - Cooperative management: Established voluntary coop in 2010, following rationalization of BSAI cod fishery.
 - Ended race-to-fish, facilitates spread out fishery over time, space.
 - Observed fleet: All vessels 100%+ human observed and use cameras, flow scales to ensure precise catch data.
 - Bycatch reduction:
 - *Seabirds*: Pioneers in seabird mitigation, use of streamer lines
 - *Halibut*: Weekly catch reports; halibut PSC numbers ~1/4 of limit (2017); early adopters of careful release practices
 - MSC/RFM: The BSAI FLL Pacific cod fishery was first cod fishery in the world to obtain MSC certification. Maintains certification through MSC, RFM.

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Impacts on fleet of GHL increase

- Pacific cod-dependent fleet: FLL fleet harvests almost exclusively Pacific cod
 - >95% of targeted catch is Pacific cod (Gturbot, IFQ sablefish)
 - 90% of total catch (retained) is Pacific cod (2017)
 - Historically, 92% of FLL Pacific cod harvest is in BS
 - 2018: ~99% of Pacific cod harvested in BS
 - *Highly specialized*: FLL vessels are highly specialized and cannot easily convert to participate in other gear types or fisheries (due to configuration and federal license requirements).

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- Reduction in operations: With less Pacific cod to harvest, vessels get tied up and jobs are lost.
 - In 2018, four fewer vessels operating vs. 2017 (27-23) due to 80% decline in GOA, reductions in BS.
 - More expected in 2019 if GHL increases, BS stock declines.
- Higher GHL=Lower TAC: Particularly in times of low abundance, any reduction to the BS Pcod ABC = a reduction in BS Pcod TAC.
 - Cod needed by all sectors. TAC set to ABC except in years of very high abundance.

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- Compounding reductions: An increase in GHL would be 3rd decline in the available harvest for our fleet in the past two years, with more expected in 2019
 - 2018 GOA: 80% reduction of ABC, TAC from 2017
 - 2018 BS: 16% reduction of ABC, TAC from 2017
- Buy-back loans: Reductions in available harvest threaten ability for fleet to pay back federal buy-back loans initiated to promote sustainability of fishery.
 - To address overcapitalization in sector and latent permits, FLL sector took out federal loans in 2007 (\$39m for 30 yrs) for voluntary buyback of 3 vessels and 13 permits/licenses.
- Investment in Alaska: Less harvest means less revenues to invest in Alaska, less reinvestment in future of fleet.

FLC Recommendation

- Request the proposals to increase the allocation to the GHL in the Dutch Harbor Subdistrict (Area O) Pacific cod fishery not be adopted.
 - Proposals 12, 13, and 14
- Rationale:
 - Conservation of resource in period of high uncertainty
 - Unjustified costs to federal fishery participants primarily for benefit of selected few within single sector.