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FINAL MAILING OF PROPOSAL BOOKS

August 2003

In response to significant programmatic reductions, the number of proposal books published and mailed each year will be significantly reduced. The August 2003 proposal book will be the last that many of you receive in the mail.

Beginning in 2004, only current advisory committee members and board members will receive a copy of board proposal books in the mail. A limited supply will be produced each year for public use at various libraries and department offices around the state.

The public, staff, and other agencies are now directed to the Boards Section website for copies of proposals.

For Board of Fisheries proposal books, please access an online copy at:

<http://www.state.ak.us/adfg/boards/fishinfo/bofhome.htm>

We regret any inconvenience this may cause.

PLEASE READ CAREFULLY—NEW INFORMATION  
**REVIEWER LETTER**  
August 2003

DEAR REVIEWER:

Attached is new and updated information regarding the Board of Fisheries upcoming meeting cycle (2003/2004). Please review carefully the following information.

**SUPPLEMENTAL PROPOSALS**

The Alaska Board of Fisheries will consider the attached packet of supplementary regulatory proposals during the 2003/2004 meeting cycle. These proposals concern: Chignik Area cooperative purse seine salmon fishery. The proposals are the result of the Supplemental Call for Proposals for the Chignik Area cooperative salmon fishery.

These proposals and this book are supplemental to the main proposal book distributed in July 2003. You are encouraged to read all proposals presented in this packet, and the remaining proposals in the July 2003 main proposal book.

**PROPOSAL NUMBERS AND NEW SCHEDULING DETAILS**

1. The proposals described above are numbered and scheduled as follows:

<u>NO.</u>	<u>SUBJECT</u>	<u>MEETING SCHEDULE</u>
247	<b>Chignik Cooperative Salmon Fishery</b>	November 18-19, 2003 Anchorage
thru		
252		

2. A complete revised meeting schedule follows:

<u>SUBJECT</u>	<u>DATE MEETING BEGINS</u>	<u>LOCATION</u>
<b>Work Session</b>	October 1, 2003	Downtown Marriott, Anchorage
<b>Pribilof Is. Blue King Crab Plan</b>	October 4, 2003	Downtown Marriott, Anchorage
<b>Statewide Finfish Provisions</b>	November 12, 2003	Downtown Marriott, Anchorage
<b>Chignik Cooperative Salmon Fishery</b>	November 18, 2003	Downtown Marriott, Anchorage
<b>Bristol Bay Finfish</b>	December 9, 2003	Downtown Marriott, Anchorage
<b>Arctic/Yukon/Kuskokwim Finfish</b>	January 12, 2004	Princess Hotel, Fairbanks
<b>AK Peninsula/Aleutian Is. Finfish, and Supplemental Issues</b>	February 15, 2004	West Coast Int'l., Anchorage

**OTHER INSTRUCTIONS**

For detailed instructions on how to submit written or oral comments to the Alaska Board of Fisheries, refer to the "Dear Reviewer" letter in the main July 2003 proposal book. After reviewing the proposals you may send written comments to:

ATTN: BOF COMMENTS  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 25526  
Juneau, Alaska 99802-5526  
Fax: 907-465-6094

Written comments will be accepted on any subject in this notice and may be submitted to the Board of Fisheries any time before the proposal is voted on by the board in deliberations at the scheduled meeting, but, as a practical matter, comments submitted after the board begins deliberations on relevant proposals

are likely to receive less consideration than comments submitted earlier. You are encouraged to have your written comments presented to the above Juneau address at least two weeks before the scheduled meeting. Receipt by this date will ensure that your written comments will be published in the board workbook. All comments received later will be presented to board members at the time of the meeting, but will not be printed in the board workbook.

Additional copies of this proposal booklet (August 2003) or the main Proposal Book (July 2003) may be obtained at offices of the Department of Fish and Game or on our web site at:

<http://www.state.ak.us/adfg/boards/fishinfo/bofhome.htm>

The Alaska Department of Fish and Game administers all programs and activities free from discrimination based on race, color, national origin, age, sex, religion, marital status, pregnancy, parenthood, or disability. The department administers all programs and activities in compliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, and Title IX of the Education Amendments of 1972.

If you believe you have been discriminated against in any program, activity, or facility, or if you desire further information please write to ADF&G, P.O. Box 25526, Juneau, AK 99802-5526; U.S. Fish and Wildlife Service, 4040 N. Fairfield Dr., Suite 300, Arlington, VA 22203; or O.E.O., U.S. Department of the Interior, Washington, DC 20240.

For information on alternative formats for this and other department publications, please contact the department ADA coordinator at (voice) 907-465-4120, (TDD) 907-465-3646, or (FAX) 907-465-2440.

**PROPOSAL 247 - 5 AAC 15.359. Chignik Area Cooperative Purse Seine Salmon Fishery Management Plan.** Amend this regulation as follows:

I would prefer that the board do away with the allocation only. Let the Chignik coop be a marketing coop. If the allocation is not done away with let other areas have the opportunity for an allocated coop. See how this would affect all of Alaska’s fishing industry.

**PROBLEM:** Independent fishermen are suffering because of having an allocated coop in Chignik.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** All Chignik independent fishermen will be forced out of business because of not enough fishing time. Because of the coop right now we have a derby style fishery.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** If the Chignik coop is so successful with quality it should be done in every fishery in the state.

**WHO IS LIKELY TO BENEFIT?** Only time will tell after the allocation is done away with.

**WHO IS LIKELY TO SUFFER?**

**OTHER SOLUTIONS CONSIDERED?** Removing the coop all together – but since there is one more year to go on the state’s trial, that’s not going to happen.

**PROPOSED BY:** Mori Jones (HQ-03-F-197)  
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**PROPOSAL 248 - 5 AAC 15.359. Chignik Area Cooperative Purse Seine Salmon Fishery Management Plan.** Amend this regulation as follows:

Coop can remain without an allocation.

**PROBLEM:** Chignik allocation. To remove the Chignik allocation.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The communities and the residents that live in them die out.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Cannery’s will address the quality and harvest that they sell.

**WHO IS LIKELY TO BENEFIT?** All fishermen and communities. It will hurt no one.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** Lower the allocation. Higher the allocation for local residents.

**PROPOSED BY:** Native Village of Chignik Lagoon (HQ-03-F-198)  
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**PROPOSAL 249 - 5 AAC 15.359. Chignik Area Cooperative Purse Seine Salmon Fishery Management Plan.** Amend this regulation as follows:

Go back to the way it was.

**PROBLEM:** Chignik River leads. To remove the Chignik River leads.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Resident will not be able to subsistence fish in traditional spots. Residents from the communities will get hurt with the leads closing off the river.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?**

**WHO IS LIKELY TO BENEFIT?** Won't affect no one. All year around residents and visitors.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** There is no other solution.

**PROPOSED BY:** Native Village of Chignik Lagoon (HQ-03-F-199)  
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**PROPOSAL 250 - 5 AAC 15.359. Chignik Area Cooperative Purse Seine Salmon Fishery Management Plan.** Amend this regulation as follows:

We understand the board's original intent, but after two seasons of operations, we hate to see something evolve that was not intended, and then become permanent. We therefore propose a graduated allocation percentage, so that the incentives to not join the coop are minimized. Under the current membership (77) the allocation would stay the same, but if the transition were graduated, then this might ease the pressure on those who may want to join, but who are now pressured to not join.

The allocation plan would read:

(7)(d) based on the number of permit holders participating in the cooperative as follows:

- (1) if participation in the cooperative is less than 79 [85]percent of the registered Chignik Area CFEC purse seine permit holders, the allocation to the annual cooperative fishery will be nine/tenths (.9%) of one percent of the harvestable surplus for each participant in the cooperative; and
- (2) if participation in the cooperative is less than 84 percent of the registered Chignik Area CFEC purse seine permit holders, the allocation to the annual cooperative fishery will be nine and ½ tenths (.95%) of one percent of the harvestable surplus for each participant in the cooperative; and
- (3) if participation in the cooperative is 85 percent or more of the registered Chignik Area CFEC purse seine permit holders, the allocation to the annual cooperative fishery will be one prorated share (1%) of the harvestable surplus for each participant in the cooperative.

(e) [existing language continues]

**PROBLEM:** When the cooperative fishery was created by the board in the winter of 2001, the main issue of contention was over the allocation scheme.

Those opposed to the cooperative argued that all the “highliners” would not join the coop, and therefore a larger share of the “pie” should be allocated to the competitive fleet.

We knew at the time of the board meeting that many highliners would join the coop, and we argued that if too much of a difference in allocation existed, then there would be always be an incentive to not join the coop. (We will supply transcripts of the meeting to support this information.)

In the end, the board decided to give each coop member .9% in consideration of the highliner argument, so a larger percentage was left to those not joining the coop. But the board also agreed that there should not be an incentive to not join the coop. So they decided to make the allocation equal (1%), when the coop reached 85 members, out of the total of 101 permits in the fleet.

The way the math works out, the competitive fleet ended up with an average per permit allocation of 1.4% vs. our .9%. According to the study conducted by the Commercial Fisheries Entry Commission, (Report 02-6N, December 2002) for both sockeye and all species combined, the competitive fleet, “did better on average in 2002 (under the cooperative regime) than they did over the 1994-2001 time period.” So in other words, the competitive fleet was allocated more with the existence of the cooperative fishery than what they had historically caught as a group before the coop was created.

This, along with the “when it becomes equal” point being too high (85), is where we see the potential problems.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Unfortunately, under the current situation, there actually is a greater incentive to not join the coop, which is certainly not what the board originally, intended. The more members the coop has (less than 85) the smaller the individual coop membership share becomes. Consequently, the closer the competitive fleet approaches 85, the larger the individual non-coop fisherman percentage becomes, and therefore, the greater the incentive for people to not join the coop as you approach 85 members.

To explain – if the coop had 84 members, then the competitive fleet would have  $17 - 84 \times .9\% = 75.6\%$ . This leaves 24.4% for 17 individuals, or an individual allocation of 1.44% per person. There also exists the possibility for people to actually pressure other permit holders to not join the coop the closer you get to 85 people joining the coop, since there is such a big difference in the allocation (.05%). This was not the board’s intention when they created the coop.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Absolutely – this would mean that more fish would be caught under the cooperative harvesting methods and quality measures: “live” fish deliveries to the dock, a third party quality certification program, fresh markets, boneless filet production, etc.

**WHO IS LIKELY TO BENEFIT?** The coop and local communities will benefit by higher prices to the fishermen, the processors will benefit by increased amounts of high quality fish which will enable them to pursue more profitable markets. Local communities, the State of Alaska and ASMI will benefit by greater tax returns because of the higher prices. Hope for a different future in the salmon industry for all fishermen.

**WHO IS LIKELY TO SUFFER?** Under some membership scenarios, some competitive fishermen may be allocated less than what they have been under the first two years of the

cooperative fishery, but since they are currently being allocated more than their historical averages than this different allocation plan would probably be closer to their typical percentage. However, nothing shall change if the current number of coop members stays the same.

Besides, all Chignik permit holders have the free choice to join the coop and enjoy the benefits of the coop if they wish.

**OTHER SOLUTIONS CONSIDERED?** We have considered “status quo” at length, but we are afraid that if the current allocation plan becomes permanent, than there will always be the incentive to not join the coop, and that some who would greatly benefit by the coop will continue to suffer, and the rifts and animosity that are building in some of the local communities will never heal. We would hope that this “graduated allocation” would help bring us closer together.

**PROPOSED BY:** Chignik Seafood Producers Alliance (HQ-03-F-201)  
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**PROPOSAL 251 - 5 AAC 15.332(g). Seine specifications and operations.** Amend this regulation as follows:

(g) For the cooperative fishery only, in the Chignik Bay District only, purse seines and hand purse seines may not be less than 50 fathoms or more than 225 fathoms. If there are ever concurrent cooperative and competitive openings in the Chignik Bay District, then seine regulations for the cooperative shall revert to paragraph (c) of this section. (Existing regulations).

**PROBLEM:** With the inception of the cooperative fishery, “normal” gear restrictions do not necessarily apply. There is an allocation, the department limits the cooperatives daily harvests when necessary to ensure escapement, and we all share the proceeds equally. Therefore, we would like to be able to use longer or shorter seines within the Chignik Bay District, as it makes sense under different fishing conditions in our fishing areas.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The coop will not be able to maximize its harvest potential and efficiency and improved quality. Under some conditions existing seine length limits our ability to harvest more fish in a shorter time, so we have to make more sets, which costs more money and decreases quality.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Yes, because we will be able to catch more fish in a single set or shorter period of time, and then we can tender those fish quicker from the water to the tender and to the processor in a shorter period of time. Shorter tendering and delivery times vastly improve quality. This will also help our “live” fish tendering because it is better for fish survival if we fill our live fish tenders quickly, and best of all in a single set, rather than having them take multiple deliveries, which may increase deadloss.

**WHO IS LIKELY TO BENEFIT?** The coop will benefit by increased efficiency, cost savings and the ability to move more live fish in a timely manner. This increases the overall value of the fishery.

**WHO IS LIKELY TO SUFFER?** No one shall suffer – the allocation ensures that both cooperative and competitive fleets get their share, so how the coop harvests their allocation is irrelevant to how the competitive fleet harvests their allocation.

**OTHER SOLUTIONS CONSIDERED?** Status quo? But why keep the same seine regulations when we can improve our harvesting and handling techniques within the coop by changing a little? It does not affect the competitive fleet at all because of the allocation, and quality and efficiency are improved.

**PROPOSED BY:** Chignik Salmon Producer's Alliance (HQ-03-F-202)

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**PROPOSAL 252 - 5 AAC 15.359. Chignik Area Cooperative Purse Seine Salmon Fishery Management Plan.** Amend this regulation as follows:

Sections (d) and (e) shall be removed from the regulation.

Section (b)(4)(B) shall be removed and replaced with the following new section:

The Chignik Area purse seine fishery shall be managed consistent with the state laws that apply to the salmon fishery resources of the state, which mandate equal opportunity for all limited permit holders to harvest the available surplus, without any allocation allotted to any group or individual.

**PROBLEM:** We ask the board to remove the existing regulation granting allocation of a percentage of the Chignik sockeye to any group or individual. While membership in the cooperative is voluntary, the existence of the cooperative and its power over the management of the fishery literally forces permit holders to either agree to the coop's principles or suffer the consequences of the coop's unfair access to the resource. This system of management that allows control of the resource by one group has caused the following problems:

1. Severely limited access to sockeye harvest opportunity for independent fleet

Again in 2003, just as in 2002, the 23 independent fishermen who chose not to join the cooperative were confined to very few days of access to the sockeye salmon returning to the Chignik management area.

As of August 18, the independent fleet had been allowed 14 and 2/3 days of fishing in the Chignik Lagoon and Central (outside the Lagoon) areas, out of a total of 71 possible sockeye fishing days. A further three to four days fishing time was possible.

In the 2002 season, the independent fishermen were allowed only four fishing days in June, four fishing days in July, and seven days and 20 hours in August, for a total of 15 days and 20 hours for the year. Prior to 2002, a normal average fishing season was 60 days on the water.

2. Severely limited access to traditional outside sockeye fishery for independent fleet

The independent fleet was once again in 2003 limited to very few days of access to the traditional central district sockeye fishery outside Chignik Lagoon. The sockeye openers outside the Lagoon took place at the same time as the Lagoon fishery openers, as usual. However, because of the short fishing time for the independent fleet there was no consideration given to those fishermen who normally make their total season in the central district. These fishermen fish outside the Lagoon because their boats and/or gear are not usable in the shallow waters inside the Lagoon. The ruling of the board in managing the allocation fishery discouraged the majority of the outside fleet from participating when the realization of no fishing time became a regulation. As in 2002, the lack of traditional effort displaced five outside tenders and their crews, leaving them with zero income from this season.



Openers for the independent fleet outside the Lagoon/Central district were in the Western/Perryville district, where approximately 70% of the fish caught were pinks, 15% were coho, and only 2% to 3% were sockeyes. Because of market conditions, the non-sockeye fish were worth very little, and did not add significantly to the income of the independent fishermen.

### 3. Potential loss by independent fisherman of a significant portion of the season

Due to the greatly reduced number of available days of access to the sockeye fishery, the effect of losing even one day of fishing time to weather or mechanical breakdown is magnified.

### 4. Loss of a market in the latter part of the season

As occurred in 2002, again in 2003 the permit holders not in the coop will lose access to the sockeye in late August and to the September peak of the coho run in the Chignik area, due to a continuous coop fishery based on achieving their sockeye allocation. As a result, the market for the independent fleet is disappearing. The processor not working with the coop is closing early this season (August 21 instead of September 10-15 as usual), due to the lack of volume caused by the coop boycott of their plant.

This situation hurts the local Chignik permit holders more severely, as they traditionally did well after the departure in mid-August of the fishermen from outside Chignik.

### 5. Processor losses and potential permanent closure

Historically, two plants have operated in the Chignik area. In 2002, the processor that did not reach an agreement with the cooperative (Processor #1) was practically shut out of the fishery due to severe reduction of poundage sold to the plant. The cooperative fleet sold all their fish to the other plant (Processor #2) and none to Processor #1. The percentage of fish allotted to the independent fleet was not enough to keep Processor #1 economically operational.

In 2003, Processor #1 negotiated pre-season with the coop, which controls processor access to almost 70% of the sockeye. Processor #1 offered the coop a higher price per pound, and the benefit of a more diversified product mix than Processor #2. They also asked for delivery of what amounted to 25% of the projected coop harvest. Regardless of that agreement, the coop fleet delivered less than 5% of their sockeye to Processor #1, effectively boycotting the plant.

The continued lack of access to a reasonable level of sockeye production threatens to cause the permanent closure of Processor #1 in Chignik, at a time when the state's salmon fisheries are in desperate need of progressive, solvent, American processors.

### 6. Loss of employment and income for fishing boat crewmembers

The cooperative promised that the allocation would benefit the local residents and communities. Instead, the reduction in the number of fishing vessels drastically reduced the number of crewmembers needed, causing loss of jobs. Also, the coop methods reduced the income to crewmembers working on coop vessels. The only beneficiary of the coop is the coop permit holder.

### 7. Loss of employment for tenders and their crews

All tenders not members of the coop, both poundage and daily, have seen their operations eliminated or drastically reduced, creating unbearable financial losses.

### 8. Loss of business and employment in support sector

The reduction in the number of fishing and tender vessels has hurt the operators of the local air service provider, the bulk fuel companies, the local retailers, and the only marine supply store. The reduction in business has harmed local and nonlocal employees who depend on work in the local businesses, and has impacted the economies of Chignik area, Anchorage, Naknek and King Salmon.

#### 9. Crew problems

Due to the reduction of fishing time, the ability to hold and manage a crew is difficult. The amount of idle time without income has increased the consumption of alcohol and general mischief, and decreased the morale and income to these valued members of our communities.

#### 10. Social problems

The experiment of allocation has driven a wedge of division through our communities, families and friendships.

#### 11. Double dipping

Some coop permit holders in both 2002 and 2003 have transferred their Chignik permits to relatives and participated with their vessels in other salmon and other species fisheries in the state and in Washington. These individuals collect income from those fisheries, and from the Chignik fishery, while the cooperative benefits from the addition of their allocations. This practice could be stopped with a focused regulation.

#### 12. Inequitable transfer of economic benefit from one group to another.

Rather than a true rationalization scheme, which includes a reduction in the number of permit holders or participants as well as a reduction in the number of actual vessels fishing, the cooperative management scheme maintains the same number of participants into perpetuity, and guarantees them a share of the benefits from the resource. In one sense, this promises that permit holders will always have a certain level of income from the fishery, no matter how difficult the circumstances of the market. This has a strong appeal to certain individuals, particularly those who do not want to fish or who can no longer fish because of age or infirmity.

However, effectively the same pie – Chignik sockeye fishery income – is cut into the same number of pieces as it always has been, but with the addition of the latent (non-fished) permits which before the coop numbered as many as ten or more per year. Each latent permit, if a member of the coop, is now rewarded with a share in the benefits from the fishery, reducing the share available to the independent fisherman who continues to fish.

Similarly, an individual who wishes to buy into the fishery can now do so with no thought to actually fishing his/her permit – reportedly three permits have already been sold to these “investor” permit holders or coop “shareholders” who will simply add their individual allocation to the cooperative pot and take their checks at the end of each season.

Because each member of the coop takes a portion of the benefits from the resource out of the Chignik “pie,” this management scenario in effect forces the independent fishermen to subsidize the members of the coop, particularly those who do not fish.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** If this problem is not solved, vessel owners who do not belong to the cooperative will continue to lose money until they lose their investments and livelihoods; crews, tenders and processors will continue to be unemployed and

disadvantaged; communities will lose population and economic viability; permits will continue to leave the local area, and an entire way of life will cease to exist.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** The quality of the sockeye harvested in Chignik – or anywhere – depends on proper management, proper handling by harvesters and tenders, and proper grading and processing at the plant. All of these can be achieved in a normal, open fishery without allocations, particularly in a small and easily managed fishery such as Chignik. We can look for models to the Copper River sockeye and king successes, and, more recently, to the Aleutia branded chum project.

The department, in Chignik and all over the state, has a superb record of enlightened management, with a growing emphasis on managing for quality as well as for their first charge of sustainability. This proposal puts great faith in the department and their impeccable intentions.

With the passage of this proposal, Processor #1, referred to in the above sections, would maintain the opportunity to buy fish from harvesters and continue the quality programs they and the independent fleet have instituted in Chignik. This processor has slush iced totes on board its tenders for the premium sockeye. There is therefore no pumping of the fish, which detracts from quality, and the ice maintains the superb intrinsic quality of the sockeye.

At the plant, the processor has the ability to send out fish fresh by air, freeze fish either headed and gutted or in fillets, and can fish in quarter pound, half pound or tall cans. Typically, all the sockeye over four pounds is headed and gutted, then anything over six pounds is sorted out, as is any fish not a number one grade. Top quality fish of six pounds and over are filleted. Top quality four to six pound fish are frozen headed and gutted.

Any fish not graded as number ones are sent to the can lines, as is any fish six pounds or more not proving to be number one after filleting. Further sorting takes place before canning, with the best quality going into the quarter-pound premium product, and the others into half-pound cans.

This ability for diversification of product type is a real advantage. Processor #2 has no can lines, and therefore must put all sockeye on the market either fresh or frozen, whether it is premium quality or not.

**WHO IS LIKELY TO BENEFIT?** The permit holders and crews, tender operators and crews, processors and processing workers, support industries, community members and organizations, consumers of Chignik sockeye, the economy of the area, and of the state.

**WHO IS LIKELY TO SUFFER?** No one. As outlined above, the goals of the Chignik fishery can be achieved within the normal management system if all parties make quality a priority and the market rewards their efforts. Increased quality can be accomplished without restricting other fishermen's access to the public resource.

**OTHER SOLUTIONS CONSIDERED?** An alternate solution considered was the allocation of his or her historic share of the total harvest to each permit holder, based on his/her average catch during a certain number of years' participation. However, although this approach is more equitable than the allocation of equal shares, if there were more than one group of permit holders, as in the case of the current cooperative, and the fishery were managed as it is currently, the management of the fishery to achieve the collective harvest of these individual shares would

still force one group to sit on the beach while the other group reached a certain point in their allocation, and vice versa.

This could cause the same problems currently experienced, as illustrated by the situation towards the end of the 2002 season when the cooperative harvest vessels were not catching enough fish to prevent fish passing through in numbers well over the desired escapement levels – yet the non-coop permit holders were not allowed to fish for the surplus fish.

Also, the control of harvest rights to the resource by any one harvesting group could still lead to an imbalance in processor opportunity, or to the “boycott” of a processor by that group. Clearly, if a formal sharing of the harvest rights to the resource based on historic participation is acknowledged, processors would ask for a similar sharing of the rights to process that resource.

**PROPOSED BY:** Chignik Fishermen United

(HQ-03-F-203)

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