



March 20, 2007

North Pacific Fishery Management Council
605 W 4th Ave, Suite 306
Anchorage, AK 99501-2252

Re: Gulf of Alaska Groundfish Rationalization

Dear Council Members:

On behalf of Food & Water Watch, a nonprofit consumer rights organization that supports economically and environmentally sustainable fisheries policy, I would like to express concerns about Gulf of Alaska groundfish rationalization.

We commend the Council for electing at its December meeting to defer further action on the Gulf rationalization program. However, we respectfully request that the Council use this time to examine whether rationalization is appropriate, not when or how it can be implemented. Groundfish rationalization would exacerbate many of the problems it was designed to address, and would create new socioeconomic, environmental and safety problems.

By establishing tradable quota shares, rationalization allows for consolidation within fishing sectors as larger fishing businesses acquire shares from smaller businesses. This system also decreases crew pay, and as evidenced by the crab rationalization program, eliminates a large number of jobs. (Please see enclosed report)

As people are displaced from one fishery, competition within other fisheries can increase. As the Council has pointed out, rationalization programs in the BSAI and GOA have increased competition in the Gulf of Alaska cod sector. Establishing a new rationalization program would further increase competition in other fisheries.

Rationalization is also inconsistent with the goal of reducing bycatch. Gear types with the highest historic catch levels may also have the highest bycatch levels. Therefore, quota allocations based on historic catch levels can entrench environmentally inefficient gear types and foreclose on management options intended to reduce bycatch. Moreover, rationalization can promote the practice of high-grading by allowing fishermen to keep only the most economically valuable fish, and discard less valuable fish.

Insofar as rationalization proposals include processor linkages, they can fail to address the safety concerns the Council has raised. When fishermen are beholden to the timing needs of processors, they often lose the freedom to fish when conditions are safer.

While the Council may find it necessary to re-evaluate GOA groundfish management, we urge you to avoid programs that rely on tradable quota shares and processor linkages. We also encourage the Council to work with all members of the local fishing communities that would be impacted by any rationalization program. We look forward to working with you in the future. For additional information, contact Konrad Fisher at 202.797.6543.

Sincerely,

Konrad Fisher
Wild Oceans Campaign
Food & Water Watch

Enclosure: Irrational Approach; How Individual Fishing Quotas Protect Private Interests, Not Public Resources