

**HALIBUT AND SABLEFISH IFQ PROGRAM  
AMENDMENT PROPOSAL  
North Pacific Fishery Management Council  
Fax: (907) 271-2817**

Name of Proposer: **Rhonda Hubbard**

Date: 1/19/12

Address: **P.O. Box 3302**

Telephone: **(907) 224-5584**

**Brief Statement of Proposal:**

**The mandated 63% product recovery rate (from round weight to an H&G Eastern product-condition code 08) for Sablefish, as established in the federal register, is inaccurate and needs revision. The revision should establish other methods in which a more accurate PRR can be used by fishers who land eastern cut H&G Sablefish from federal waters. Agency should also consider potential PRR differences for Eastern Cut Sablefish that is frozen at sea, where less shrink is possible, versus aged product landed and frozen on shore.**

**Objectives of Proposal (What is the problem?):**

**The PRR for Sablefish landed as condition code 08 does not take into account seasonal or size variances of actual harvest. Consequently the rate is not fully representative of what is actually delivered. This causes agency to slightly over- calculate a fishers actual IFQ harvest resulting in lost revenues to those who may land and deliver their product under the 08 condition code. This low rate also proves discriminatory and inequitable to vessels that freeze sablefish at sea or deliver their products H&G to shore-based processors.**

**Example of potential loss: Landed lbs = 50,000 H&G, Condition Code 08**

**@ 63% NMFS PRR = 79,365 Round lbs deducted from IFQ share.**

**@ 66% (Suggested PRR per attachments/Canadian PRR) = 75,758 lbs deducted.**

**Difference = 3607 lbs extra deducted from fishers IFQ but not harvested**

**Multiplied by \$5.54/lb average raw fish price per 2011 NMFS fee schedule = \$19,985 loss**

**Need and Justification for Council Action (Why can't the problem be resolved through other channels?):**

**While I have consulted agency on possible ways to resolve this matter, it appears that in order to bring this forward with priority and to make changes in the Federal Register, where PRR's are published, going through the Council process provides the most credible and expedient method of resolve.**

**Foreseeable Impacts of Proposal (Who wins, who loses?):**

**Winners –**

- 1. Fishers who deliver sablefish under the 08 condition code to shore base facilities, and those who process sablefish at sea and also deliver in the 08 Condition code.**
- 2. NMFS (RAM) and State of Alaska - since they would realize more IFQ sablefish pounds to collect fees and fish taxes on.**
- 3. NMFS Resource Managers / Public – due to more accurate accounting of resource.**

**Losers—Not aware of any**

Are there Alternative Solutions? If so, what are they and why do you consider your proposal the best way of solving the problem?

**Alternative solutions are currently unknown until this proposal can be brought forward for discussion by agency and industry participants.**

Supportive Data and Other Information (What data are available and where can they be found?):

- 1. This inaccurate PRR is commonly and empirically evidenced by sablefish landed in the round at shore-based processing plants where a recovery rate of around of 65%-68% is typically realized-- See attached settlement sheets.**
- 2. The Canadian Department of Fisheries & Oceans maintains not only a higher recovery rate but also distinguishes rates between Sablefish that is frozen on shore and frozen at sea -- as noted.**

Sablefish:

Frozen: Japanese cut, 1.48 = 67.5%

Fresh: Japanese cut, 1.51 = 66.2%

- 3. Check with Archipelago Marine Research Limited (250) 383-4535 – Contracted research firm for CDFO**

Signature: