



**November 6, 2025**

Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220

**RE: Letter of Support – Exempted Fishing Permit to Process Pacific Whiting At-Sea South of 42° N Latitude**

Dear Chair Hassemer and Members of the Council:

On behalf of United Catcher Boats (UCB), I am writing to express our strong support for the *Exempted Fishing Permit (EFP) to Process Pacific Whiting At-Sea South of 42° North Latitude*, submitted by the Pacific Whiting Conservation Cooperative (PWCC) with co-applicants Arctic Storm Management Group, American Seafoods, and Phoenix Processor Limited Partnership.

**Purpose and Need**

The Pacific whiting fleet has long operated under a regulatory framework that prohibits at-sea processing south of 42° N latitude – a restriction established more than three decades ago in response to conditions that no longer reflect today’s fishery. Since that time, the at-sea whiting fishery has been fully rationalized under the Pacific Coast Groundfish Fishery Management Plan, with 100 percent monitoring, individual accountability, and cooperative management, with hard caps on salmon bycatch. These tools ensure that modern fleet operations meet the highest standards of conservation and accountability.

The proposed EFP would test whether expanding the processing footprint between 40° 10’ N and 42° N latitude can provide greater flexibility to target clean whiting aggregations while minimizing interactions with salmon and rockfish. This carefully controlled experiment aligns directly with Council priorities to reduce bycatch, improve utilization of available quota, and strengthen the science underpinning adaptive management decisions.

**Commitment to Conservation and Data Collection**

UCB supports this EFP because it is designed with robust safeguards. The at-sea sectors already operate under industry-based Salmon Mitigation Plans and have mandatory movement and real-time information-sharing requirements. All catch and bycatch are monitored under existing NMFS observer and EM programs, ensuring full transparency and data integrity.

In addition, the EFP includes a limit on the amount of whiting that can be processed by each sector (35%), a 500 fish Chinook cap, and will collect genetic stock-identification data on any salmon encountered in the area.

These samples could improve our collective understanding of salmon stock distribution and migration, supporting better management for both groundfish and salmon resources.

In addition to the safeguards present in the submitted EFP, UCB also recommends inclusion of a May 15 start date for the first two years of the EFP, as proposed by Midwater Trawlers Cooperative.

### **Alignment with National Standards and Council Goals**

The proposed EFP directly supports National Standards 1 and 9 of the Magnuson-Stevens Act by promoting optimum yield while minimizing bycatch. It also advances the Council's EFP priorities under COP 19, emphasizing conservation-driven research and practical management innovation.

### **Conclusion**

Authorizing limited, carefully monitored at-sea processing south of 42° N latitude will allow the fleet to respond adaptively to shifting biomass distributions, maintain operational efficiency, and contribute valuable scientific data to inform future management decisions. We believe this project exemplifies the spirit of innovation and stewardship that defines the Pacific Council's management framework and EFP process.

Thank you for your consideration and continued commitment to collaborative, science-based management. We appreciate the opportunity to support this important initiative and stand ready to assist Council and NMFS staff throughout its implementation.

Sincerely,

A handwritten signature in cursive script that reads "Andrea Keikkala". The signature is written in black ink and has a fluid, elegant style with a long, sweeping underline.

Andrea Keikkala  
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United Catcher Boats  
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