January 10, 2018

Re: Comment for the Board of Fisheries Proposal 91 (EF-F17-072)

The Underwater Harvesters Association (UHA) represents the geoduck licence-holders, divers, and exporters in British Columbia. The geoduck fishery is a co-management success story and is consistently one of the most valuable fisheries on the Pacific coast.

The UHA is writing to comment on Proposal 91: 5 AAC 38.142. Southeastern Alaska Geoduck Fishery Management Plan. Establish a weekly geoduck harvest limit of 1,000 lb per diver...

The UHA does not pretend to know how to best manage the wild geoduck fishery in SE Alaska. That said, the UHA supports measures designed to minimize flooding the market and initiatives designed to maximize the value of the wild SE Alaska geoduck fishery.

In BC the fishery operates via an Individual Quota system. The Geoduck and Horseclam Integrated Fisheries Management Plan summary is available online at [http://www.pac.dfo-mpo.gc.ca/fm-gp/ifmp-eng.html](http://www.pac.dfo-mpo.gc.ca/fm-gp/ifmp-eng.html). There are 550 quota blocks in BC and each block is assigned 1/550th of the available quota for a given 12 month season. Harvesters work closely with BC geoduck buyers/exporters in order to supply a 365 day market. When a harvester and their buyer(s) decide to fish, the vessel receives daily orders depending on market demand. Daily vessel harvests range from 15 – 70 cages per day (average cage weight 50 lb) depending on market demand.

When SE AK fishes the BC fishery is often shut down for 2 to 3 days. This may not concern the AK industry, but it is evidence of oversupply. The dock price for BC geoduck in 2017 has
averaged about $15.00 Can/lb. There is an Economic Profile of the fishery available via the IFMP link above.

Thank you for the opportunity to comment and we wish the SE AK geoduck fishery continued success.

Regards,

UNDERWATER HARVESTERS ASSOCIATION

Grant Dovey
UHA Executive Director