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INTERNATIONAL PACIFIC HALIBUT COMMISSION

ESTABLISHED BY A CONVENTION BETWEEN CANADA
AND THE UNITED STATES OF AMERICA

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AGENDA D-1(d)
Supplemental
DECEMBER 2011

November 30, 2011

Mr. Eric Olsen, Chair
North Pacific Fishery Management Council
605 West 4th avenue, Suite 306
Anchorage, AK 99501-2252

Re: December 2011 Agenda Item D-1(d): Halibut deck sorting EFP

Dear Eric:

The staff of the International Pacific Halibut Commission (IPHC) has reviewed the draft application for an Exempted Fishing Permit (EFP) to evaluate the ability to deck sort Pacific halibut bycatch on Amendment 80 Bering Sea trawl vessels. The experiment, proposed by the Alaska Seafood Cooperative (AKSC), will evaluate the potential to reduce discard mortality by sorting halibut on deck, and also evaluate several deck sampling procedures.

The IPHC staff supports the research being proposed and the issuance of the EFP. Our experience with evaluating deck sorting procedures has shown that mortality can be reduced with improvements in handling procedures aboard trawl vessels. Current Amendment 80 requirements for the unsorted catch to go below deck for sampling admittedly facilitates observer sampling but inevitably mandates unnecessarily high mortality rates. We believe that alternatives exist which would allow for observer sampling on deck, and the participating trawl operators are willing to change their practices to accommodate the alternatives being evaluated. We have the following comments in support of this recommendation:

1. The proposed 2012 EFP expands on similar work conducted under an EFP in 2009 by applying the deck sorting approaches to different target fisheries and vessel configurations. We believe this will provide background evidence of conditions where the methodology will and won't work;
2. Concerns noted by NMFS regarding sea samplers providing catch estimates appear inconsistent with practices in past EFPs, where catch and bycatch estimates have often been provided by sea samplers to observers, or from EFP holders to NMFS;
3. We note that the catches taken under the proposed EFP would essentially be accounted for within the groundfish and halibut PSC allocations, i.e., a request for additional halibut PSC is offset by a set-aside of the same amount from 2012 cooperative operations. AKSC acknowledges it will forfeit any savings created by a lower amount of mortality. Procedures were also outlined so that the total 75 mt will not be exceeded;

4. IPHC staff worked with the applicant on designing the on-deck sampling protocol, which we support for this investigation;
5. AKSC will hire a third party to track bycatch and groundfish catch amounts. We support this, as it creates an arms-length role for the catch tracking. Though not stated in the application, we would suggest that the third party selected also be agreeable to NMFS.
6. We would support the requested regulatory exemptions (page 17) for purposes of this EFP.
7. We note this EFP does not include any use of EM to ensure the deck sorting practices. The applicant used EM in their 2009 EFP, and found that, while costly, it was useful for monitoring the crew behavior and sorting practices on deck. Given the exemptions from current A80 requirements which are being requested, we believe it would be useful and instructive to also consider EM for this EFP, especially for those vessels where the sorting protocols may be more difficult to consistently follow.

Gregg Williams of the IPHC staff will be in attendance at the meeting and can answer any questions the Council may have on this issue.

Sincerely yours,



Bruce M. Leaman
Executive Director

cc: Commissioners

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: D-1 (d) EFP (Halibut Mortality Trawler^{on})

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	GREGG WILLIAMS	IPHC
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.