

As the analysis and discussion of abundance-based PSC limits move forward, the IPHC notes the following items for the NPFMC's consideration:

- Given ongoing concerns regarding the conservation implications of bycatch mortality, we suggest that protection of the coastwide Pacific halibut spawning stock biomass should be identified as a high priority by the NPFMC, consistent with the Commission's responsibility for ensuring conservation and optimal yield of the stock in the IPHC Convention and the priority afforded conservation in US domestic legislation and policy.
- A key feature of any abundance-based management approach will be the baseline or starting point from which PSC limits will vary with Pacific halibut abundance. The IPHC remains very interested in how this point is determined and in further efforts to reduce Pacific halibut bycatch mortality in Alaskan waters, consistent with the magnitude of reductions achieved in other IPHC regulatory areas.
- The IPHC is also interested in discussing measures that will mitigate the potential for increased Pacific halibut bycatch mortality should overall Pacific halibut abundance increase. An overall cap or other measures may be possible management options, as well as appropriate incentives.
- The implications of abundance-based PSC management for overall management of the coastwide Pacific halibut resource remain unclear; the IPHC anticipates that future opportunities for in-depth discussion of the proposal with the NPFMC will be necessary and desirable as it develops further.

The IPHC appreciates the opportunity to work with the NPFMC on both our shared and our complementary goals with respect to the Pacific halibut stock and fishery, and the IPHC Secretariat will continue to be engaged with the technical work to develop the NPFMC's abundance-based PSC management proposal.

Sincerely,



Dr. James W. Balsiger
Chairperson
International Pacific Halibut Commission

cc: IPHC Commissioners
Dr. Wilson, Executive Director IPHC
Mr. Witherell, Executive Director NPFMC