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May 27, 2014

Mr. Eric Olson, Chairman
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252

RE: Agenda Item D-2 Sector Reports on BSAI Halibut PSC Measures

Dear Chairman Olson:

Thank you for the opportunity to provide a report to the North Pacific Fishery Management Council (Council) on the actions by the Freezer Longline Coalition (FLC) to minimize BSAI halibut PSC mortality by the FLC members' fleet. The FLC recognizes the importance for Council to address halibut mortality and efforts to ensure the sustainability of the BSAI halibut stock. This report will provide you a synopsis of actions by FLC and our members on halibut PSC and efforts we are engaged in to further minimize our PSC mortality. I will note that this is an issue that has produced much discussion, but little consensus within our membership. Actions we propose to move forward with at this time are only a small part of the extensive talks we have had on this issue. The FLC and its members will continue to examine how we can further contribute to minimizing halibut PSC mortality going forward. We appreciate the opportunity to comment and look forward to a continued dialogue with Council on this important issue.

The FLC represents the owners and operators of over 30 U.S.-flag vessels that participate in the freezer longline sector of the Pacific cod fishery in the Bering Sea and Aleutian Islands. FLC member vessels range in size from approximately 110 to 185 feet with a gross tonnage of approximately 140 to 1400 tons. The mission of the FLC is to promote public policy that facilitates the sustainable and orderly harvest of Pacific cod and other groundfish species. All members of the FLC who participate in the BSAI Pacific cod fisheries are also members of the Freezer Longline Conservation Cooperative (FLCC), a voluntary cooperative established in 2010. The mission of the FLCC is to sustainably manage the quota allocated by the Council to the freezer longline sector of the BS and AI Pacific cod fisheries. FLCC and its members work collaboratively with NMFS to ensure the efficient and responsible harvest of the Pacific cod quota allocated to the sector, including maximizing optimum yield in the fishery and minimizing bycatch of other species. Since its establishment, FLCC has been a leader in efforts to reduce bycatch and promote more sustainable fishing practices in the BSAI.

FLC actions to minimize halibut PSC mortality

The FLC and its members take seriously our responsibility to be stewards of the environment and the resources that inhabit the waters we fish. Our members are Alaskans and Washingtonians who have spent their careers living and working in Alaskan communities. We understand the reliance of Western Alaskan communities on the Bering Sea and share an interest in sustaining its resources for all of us to continue to harvest now and in future generations.

FLC members have a long record of voluntary actions to minimize halibut PSC mortality by our fleet. A driving factor of our decision to form the FLCC in 2010 was to enable our fleet to more carefully manage our harvest of targeted and bycatch species, including halibut. Our FLCC membership agreement includes specific language on the management of PSC catch by members, including severe penalties for exceeding limits on PSC catch established by the cooperative. These are actions that were facilitated by our own efforts to proactively address PSC mortality by our fleet. Other actions taken by FLC to minimize halibut PSC mortality include:

- *Weekly reports on halibut PSC:* Janet Smoker/Fisheries Information Services (FIS) provides our fleet with two weekly reports, including information on halibut mortality by our boats and updates on discard mortality rates for each vessel. These reports help members to monitor halibut PSC trends and rates by season.
- *Catch data on Sea State:* Similarly, our members have access to regularly updated catch data produced on targeted and bycatch species, including halibut. This services provides members with extensive, near real-time data on their catch and enables them to map their recent activity.
- *Careful release practices:* FLC members train all crew on careful release practices. Crew are taught the best methods for handling PSC species to enable them to return to the sea minimally affected by their encounter with our boats.
- *Annual meeting for crew officers:* FLC hosts an annual symposium for officers and crew to give them an opportunity to hear reports about actions at Council and other developments impacting their operations. We held our 2014 symposium in May, which featured a report on halibut DMR from Janet Smoker, amongst other presentations from current and former NMFS officials and others. These events help keep our officers and crew current on management and regulatory actions in the fishery and helps inform other symposium participants about what's happening on the water.
- *100% observer coverage, plus scales:* The FLC collaborated with NMFS to institute 100% observer coverage on our entire fleet. Members were required to accept observer coverage on their vessels as a component of membership in the FLCC. More recently, our entire active fleet except one vessel added flow scales as a means of further monitoring our catch. Vessels without flow scales began carrying two observers until a scale was installed. The addition of scales, completed in the past year, required nearly \$100,000 of new equipment on each of the FLC vessels. The one vessel that does not currently have a flow scale maintains two observers on the vessel.

The result of these actions by the FLC and our members has been a dramatic reduction in halibut PSC mortality rate in since the formation of the FLCC. The FLC fleet's BSAI halibut

mortality rate in 2011, the first full year operating under the cooperative, was 29% lower than in 2010.

- BSAI halibut mortality rate (kg halibut/mt cod, not incl. CDQ), FLC fleet:
 - 2010: 66
 - 2011: 47
 - % reduction: 29%

Our fleet has effectively maintained this rate since then, with little discernable change. The rate for the most recent three years (2011-2013) is 24% lower than the previous three years, demonstrating the effectiveness of the steps we've taken to minimize halibut PSC.

- BSAI halibut mortality rate (kg halibut/mt cod, not incl. CDQ), FLC fleet:
 - 3yr avg. for 2008-2010: 62 (rates: 64, 56, 66)
 - 3yr avg. for 2011-2013: 47.3 (rates: 47, 48, 47)
 - % reduction: 24%

The discard mortality rate (DMR) for our fleet tells a similar story. DMR in our fleet has decreased each year since the initiation of our coop, with numbers indicating a further decline in 2014.

- BSAI halibut discard mortality rate, FLC fleet:
 - 2011 (1st yr of FLCC): 9
 - 2012: 8.9
 - 2013: 8.4
 - 2014 (to date): 8

A commitment to continued stewardship by FLC

The FLC is committed to continuing to examine the most appropriate steps for minimizing halibut PSC mortality, both within our fleet and across the industry. Since the Council last considered halibut PSC issues in February, we established a Halibut Bycatch Committee to examine specific actions our coalition can take to further minimize our PSC mortality. Our committee has met four times just in the past few weeks to talk through these issues. In our discussions, we've consulted with the IPHC and enlisted FIS and Sea State to provide data on halibut PSC metrics related to our fleet, including PSC mortality, rates, and DMR. We've broken down data by vessels, seasons, months of the year, and other categories and reviewed the data on maps of the BSAI and in charts. All of this has given us a higher awareness and more comprehensive understanding of halibut PSC and our fleet. None of this has produced a clear path forward on how to address this issue. If anything, it's emphasized the complexity of the matter. However, it has greatly informed our discussions and will be important for our future deliberations on the issue.

FLC halibut PSC incentive program

As noted, opinions continue to differ on what actions FLC may take to further minimize halibut PSC by our fleet. One point of agreement by our Halibut Bycatch Committee is to establish an FLC incentive program to encourage further reduction of halibut PSC mortality. Details on this

program would be worked out by the full FLC membership, but the framework discussed (to be confirmed by our Board) is to encourage actions to reduce mortality through setting aside a certain amount of BSAI P-cod allocation for the A and B seasons at the beginning of each year and awarding the amount to the member/vessel with the lowest mortality rate during each respective season. In such a program, the amount would likely be awarded near the conclusion of each season to allow for harvesting of the allocation during the same season. The FLC board will be taking up this incentive program at our next meeting. Should it be approved, we will move forward to implement this program this summer.

Other actions

The FLC is focused on continuing our efforts to minimize halibut PSC so we do our part to responsibly manage the resource. However, to arrive at a broad solution to concerns on halibut biomass we would suggest that there needs to be additional consideration of the most beneficial steps for stakeholders to take to minimize halibut PSC and sustainably manage the resource. This should include consideration of the most impactful measures to preserve a targeted halibut fishery.

When examining halibut PSC, it's important to consider the impact of different participants on the resource. The following is a look at BSAI halibut PSC harvest by the FLC fleet:

- BSAI halibut PSC harvest, FLC fleet (FLC figures):
 - 2011: 473 MT
 - 2012: 541 MT
 - 2013: 466 MT
 - 3yr total: 1,480 MT

From the years 2011-2013, the FLC fleet harvested a 3yr total of 1480 MT of halibut PSC. This is over 300 MT less than the lowest 1yr harvest (1810 MT) recorded by the Amdt 80 fleet over the ten year time period of 2003-2012, per the discussion paper prepared by Northern Economics on halibut mortality in January 2014. Figures from the same report show that the FLC fleet had a lower average halibut PSC mortality over the same time period than the trawl limited-access fleet. The most recent year documented in the report, 2012, showed mortality by the FLC fleet to be about half of the trawl limited access fleet. Halibut mortality rates by the FLC member fleet paint a similar story relative to other major PSC participants. The point isn't so much to point the finger at others as it is to put the impact of the FLC fleet into some perspective relative to other sectors. Council action to facilitate selected management changes sought by individual sectors (e.g. deck sorting) to reduce their halibut PSC mortality may go a significant way toward addressing the PSC concerns, lessening the need to implement additional reductions or other measures.

The FLC believes it is also important that Council begin to consider action to tie the halibut PSC allocation to sectors to halibut biomass. This revision would appear to be a rational approach toward making shared cutbacks in years of low abundance while allowing sectors to jointly benefit from years where biomass numbers are strong. Implemented properly, this would seemingly provide benefits to all stakeholders, including western Alaskan communities that participate in and rely on operations by the FLC fleet and participants in the other sectors.

Thank you for your consideration of this important issue for the FLC. We look forward to talking with you further on these proposals. Please be in touch if you have any questions for other follow-up to these comments. Thanks.

Sincerely,



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