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INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

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January 31, 2014

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

re: February 2014 meeting, agenda item C-7 BSAI Halibut PSC

Dear Eric:

The staff of the International Pacific Halibut Commission (IPHC) has reviewed the recent report authored by Northern Economics on halibut bycatch in the Bering Sea/Aleutian Islands groundfish fisheries. The report provides a very extensive set of information about when, where and by whom, halibut bycatch is taken. While informative, it is not clear how this report will be evaluated with regard to the overall impact of bycatch mortality. Thus, the IPHC staff would like to provide comment on several aspects of the report, and follow with recommendations for future steps.

Comments on the report

The report provides a view of bycatch in the BSAI from the perspective of impacts of PSC measures on the groundfish fishery. As such, it lacks any discussion of the impacts of the bycatch loss on halibut harvesters, the directed fishery, the resource, or coastal communities. We agree that the report helps inform part of the discussion on BSAI PSC limits but we believe that discussion will be incomplete without the companion information on the impacts we note. In our view, this is a serious deficiency and we assume the Council will direct its analysts to address this aspect of bycatch in the next phase of evaluation of BSAI bycatch measures. The report of the Commission's Halibut Bycatch Work Group may be of assistance here.

The report contains several statements (pages 15, 19, and 48) about the normalized wholesale value of halibut landed by the directed BSAI halibut fisheries. We found only one instance where the source of this value was explained (footnote on page 19), and we assume that it applies to the other instances. However, the documentation is inadequate to review and evaluate the methodology used for the estimate.

The report also makes comparisons of the value of halibut bycatch to several groundfish fisheries. The first example is the directed pollock trawl fishery, which is arguably the largest fishery in the world and one of the cleanest from a bycatch standpoint; the second is the yellowfin sole trawl fishery, which has some of the highest bycatch rates among bottom trawl fisheries. Using pollock fisheries as a component of the relative value comparison distorts the estimation of total impacts and contribution to lost groundfish yield because the pollock fisheries

have a low bycatch rate. As noted in the report, pollock fisheries are not constrained by the current PSC limits (page 8). These comparisons also use different metrics of value that do not account for eventual losses to the directed halibut fishery from the sizes of fish caught in the trawl fishery. The simple comparison with landed value of the directed halibut fishery in the report does not capture these yield losses. In addition, one example (page 15) includes the value of the landed groundfish bycatch for some unknown reason; the other examples apparently do not. The purpose of making the comparisons is neither explained nor supported.

Finally, the valuations cited in the report are a product of the current management system. The use of fishery cooperatives, limited access programs, and open access all serve to create the environment under which value is added in the groundfish and halibut fisheries. Based on experience in other jurisdictions, changes to the management programs can do much to improve the valuations for all elements of this complex under both existing and future PSC limits.

Recommendations on future steps

Experience with previous bycatch discussions, such as the recent action with the Gulf of Alaska fisheries, suggest that this issue will take some time to work through the Council process. In the interim, we would urge the Council to pursue short term solutions, which would benefit both halibut and groundfish fleets. We encourage the Council and industry to find measures to improve communication on halibut bycatch while fishing, and explore the use of incentives to reduce bycatch through cooperative agreements such as those used for Chinook salmon under Amendment 91 to the BSAI FMP.

A regulatory solution might be to provide allowances for deck sorting of halibut on BSAI catcher processors, provided that bycatch can be adequately monitored. The recent study by John Gauvin, which was supported by the Commission, showed that significant reductions in the discard mortality rate are possible when halibut are sorted and returned to the sea within 15-30 minutes of being emptied from the cod end. This may require creating deck sampling protocols for observers. However, there is industry interest in moving to deck sorting, so we believe that sampling concerns can be identified and addressed, leading to solutions.

Final comment

We were somewhat surprised to find an excerpt from the recent report by the Commission's Halibut Bycatch Work Group (HBWG), pasted into the Northern Economics report (Section 5). We acknowledge that the HBWG report has been made available to the public for comment and discussion, but it is still in draft form and the material excerpted may be revised before the Commission adopts a final report. For this reason, we caution the Council in how it considers the excerpted discussion.

Thank you for this opportunity to provide comment. Gregg Williams from the IPHC staff will be attending the meeting and can address any questions on this issue that the Council may have.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Bruce".

Bruce M. Leaman
Executive Director

cc: Commissioners