

COMMISSIONERS:
ROBERT ALVERSON
SEATTLE, WA
TED ASSU
CAMPBELL RIVER, B.C.
JAMES BALSIGER
JUNEAU, AK
DAVID BOYES
COURTENAY, B.C.
DONALD LANE
HOMER, AK
PAUL RYALL
VANCOUVER, B.C.

INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

May 26, 2015

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

Re: June 2015 meeting, agenda item C2 BSAI PSC Limits

REVISED June 6 2015

VIA Email

Dear Chairman Hull:

The International Pacific Halibut Commission (IPHC) has reviewed this agenda item and wishes to draw your attention to the context of the item and a number of issues concerning it.

1. The Council's purpose and need statement on item C2 clearly recognized the need for bycatch reduction, noting that:

"...the current low status and continued declines in the halibut resource require immediate action by the Council and the industry. Additional regulatory measures to avoid halibut and further minimize halibut bycatch mortality would help improve the halibut stock conditions, provide additional harvest opportunities in the directed halibut fishery, and be consistent with National Standard 9."

A key element of this statement is the identification of needed reductions in halibut bycatch mortality, i.e., not simply a reduction in the halibut PSC limit but in the halibut bycatch mortality itself.

2. Halibut exploitable biomass and yield to the halibut fishery has declined substantially in the Bering Sea/Aleutian Islands (BSAI) since 2000, however bycatch mortality has not declined by comparable magnitude (Fig. 1). By individual IPHC regulatory areas, the bycatch mortality in the central and western Bering Sea (IPHC Areas 4A, 4B) has declined but in the eastern Bering Sea (IPHC Area 4CDE) has increased substantially since 2011 (Fig. 2). The halibut PSC limits for the BSAI have not been reduced in any significant way over this period and as a result, the Commission has been forced to reduce the catch limits for the directed halibut fishery, particularly in Area 4CDE (Fig. 3). This has been necessary to accommodate an increasing proportion of the available halibut yield being taken through bycatch mortality and to achieve the necessary conservation goals for this area. In the absence of these ongoing Commission actions, a significant conservation crisis would have ensued.
3. In January 2015, NMFS Deputy Administrator Eileen Sobeck sent a letter to the Commission urging it to adopt catch limits for the directed fishery in the BSAI, particularly Area 4CDE,

that would allow adequate fishing opportunity for harvesters in this area. She based her request in part upon a commitment that NMFS and the North Pacific Fishery Management Council would reduce halibut bycatch in the BSAI. After much debate, the IPHC Commissioners unanimously adopted 2015 catch limits for the directed fishery in Area 4CDE that maintained the 2014 status quo fishing opportunity in this area, under assurances from NMFS and the trawl fishery harvesters that meaningful reductions in bycatch mortality to support these limits would be achieved in 2015.

4. The Commission believes it is important to recognize the context of both the existing PSC limits and the current (2014) bycatch mortality when considering how PSC limits can be reduced. Figure 4 illustrates this relationship. The change from the actual 2014 bycatch level in the BSAI to that which is required to support the 2015 directed halibut fishery catch limits is a reduction of approximately 26%. This is equivalent to a reduction in the BSAI PSC limit of approximately 41%.
5. As noted in Deputy Administrator Sobeck's letter, current initiatives by the on-bottom groundfish trawl sector, such as the deck-sorting EFP, present viable opportunities to achieve the required reductions in bycatch mortality for the BSAI and particularly IPHC Area 4CDE. The Commission supports the deck sorting initiative and notes that to implement fishery-wide use of deck sorting the Council and the NMFS will need to adjust the sampling protocols currently used by the groundfish Observer Program, which require all fish to be cleared into below-deck areas before species composition sampling can occur. This protocol effectively prevents deck sorting of halibut and contributes to a high mortality.
6. The Commission and the Council have discussed the longer term goal of developing an abundance-based management framework for all halibut removals, including bycatch mortality. We believe that reduction in bycatch mortality in the BSAI represents a valuable increment in advancing to that framework.

Lastly, we wish to stress most strongly the need to have actual bycatch mortality in 2015 match that which is required to accommodate the 2015 halibut catch limits which were adopted by Commission, based on the commitment from NMFS and the Council that bycatch mortality would be reduced. The Commission appreciates this commitment and welcomes continued work with the Council and the agency on this issue.

Sincerely,

ORIGINAL SIGNED BY

Bruce M. Leaman
Executive Director

cc: IPHC Commissioners

Halibut Exploitable Biomass, Fishery Landings, and Bycatch: BSAI 2000-2015

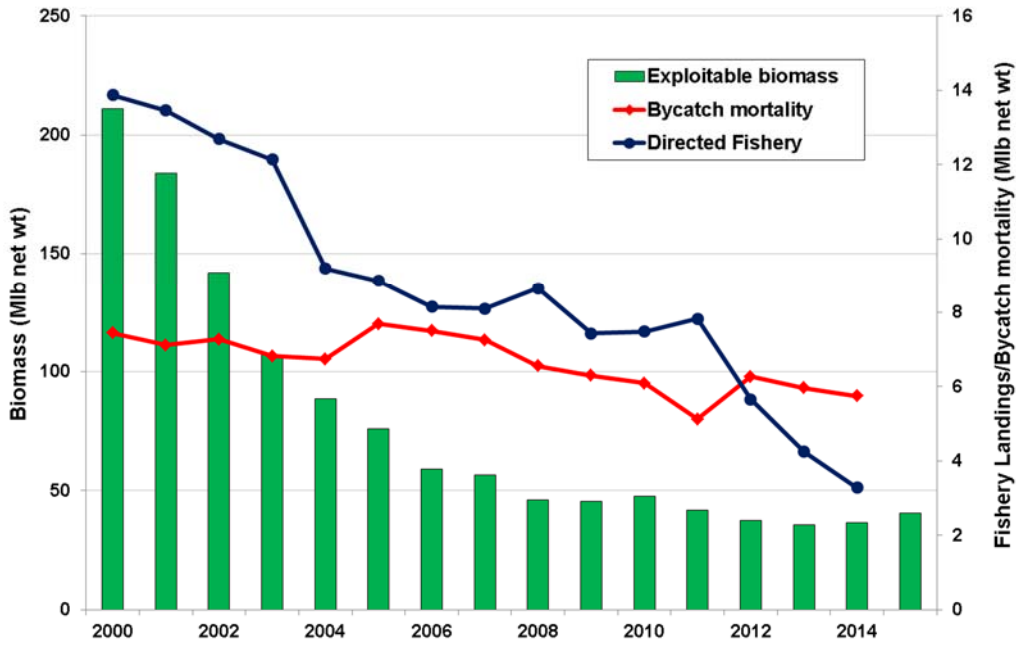


Figure 1. Trends in halibut exploitable biomass, bycatch mortality and directed halibut fishery catch limits in the BSAI, 2000-2015.

Halibut Exploitable Biomass and Bycatch Mortality 2000-2015

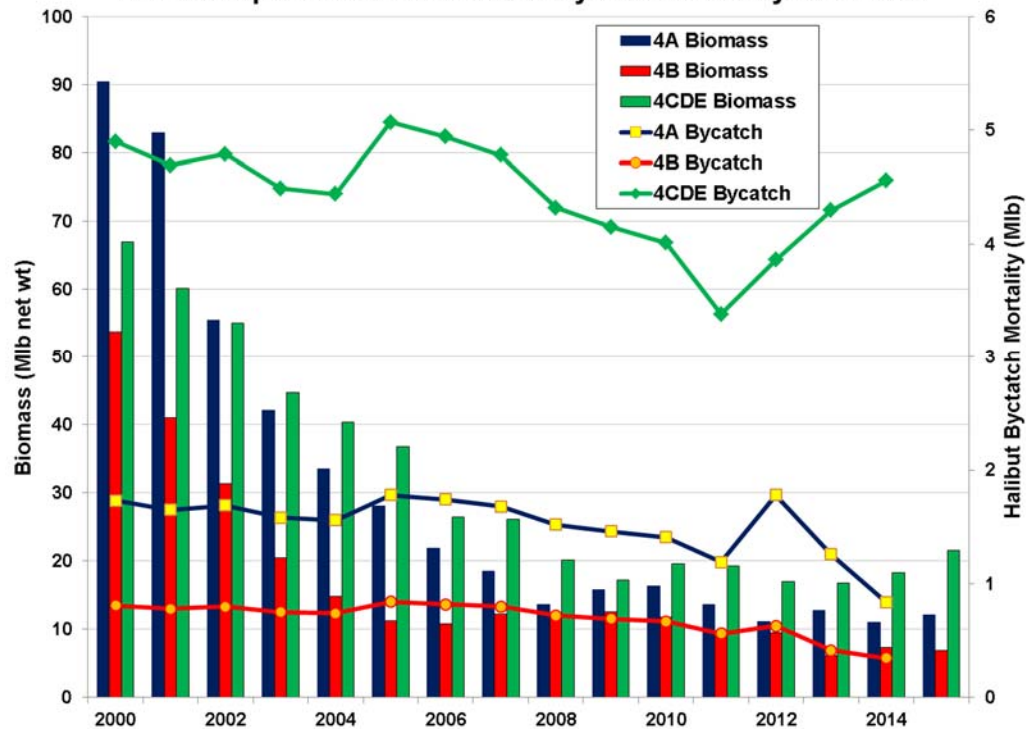


Figure 2. Trends in halibut exploitable biomass, bycatch mortality and directed halibut fishery catch limits by IPHC Regulatory Area, 2000-2015.

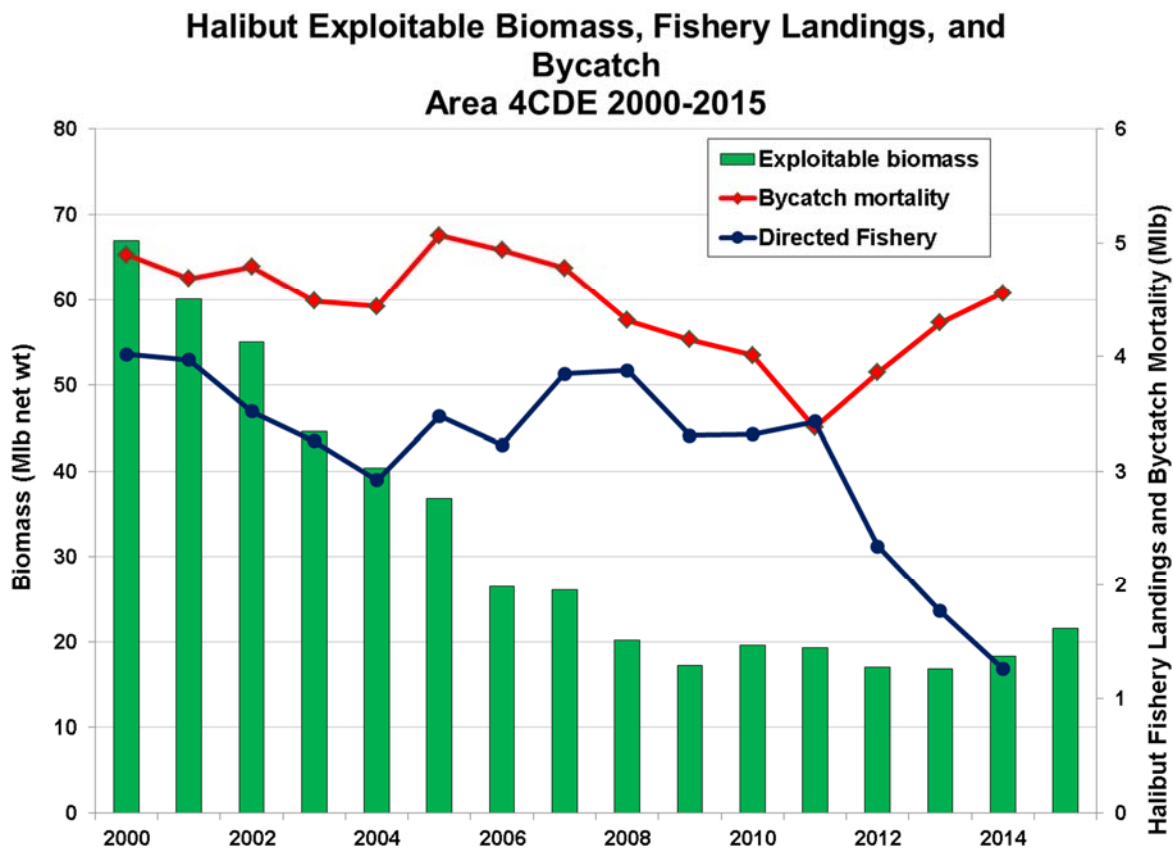


Figure 3. Trends in halibut exploitable biomass, bycatch mortality and directed halibut fishery catch limits in IPHC Regulatory Area 4CDE, 2000-2015.

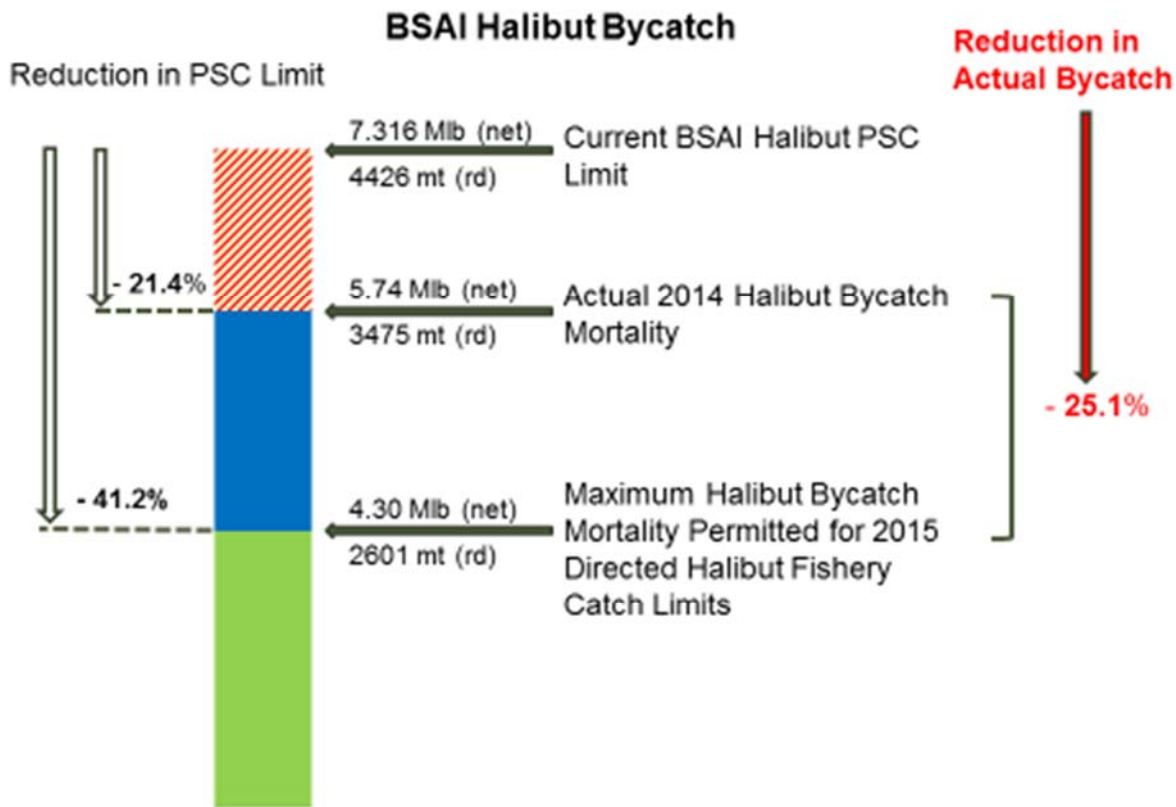


Figure 4. Relationship of BSAI halibut PSC limits, actual 2014 bycatch mortality, and reduction of bycatch mortality required to support 2015 IPHC directed fishery catch limits.