

COMMISSIONERS:
ROBERT ALVERSON
SEATTLE, WA
TED ASSU
CAMPBELL RIVER, B.C.
JAMES BALSIGER
JUNEAU, AK
LINDA BEHNKEN
SITKA, AK
PAUL RYALL
VANCOUVER, B.C.
JAKE VANDERHEIDE
DUNCAN, B.C.

INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

2320 W. COMMODORE WY, STE 300
SEATTLE, WA 98199-1287

TELEPHONE:
(206) 634-1838

FAX:
(206) 632-2983

EL2018001
17 January 2018

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

Dear Mr. Hull:

The International Pacific Halibut Commission (IPHC) notes with interest the continuing North Pacific Fishery Management Council (NPFMC) discussion of abundance-based management for prohibited species catch (PSC: bycatch mortality) limits in the Bering Sea and Aleutian Islands (BSAI), in particular at Agenda Item C9 of the NPFMC's [October 2017 meeting](#): *Abundance-based Management for BSAI Pacific Halibut PSC Limits*.

At the October 2017 meeting, the NPFMC reviewed a discussion paper on the development of abundance-based BSAI PSC limits for Pacific halibut prepared by an inter-agency working group of analysts from the NPFMC, the National Marine Fisheries Service (NMFS), and the IPHC. The NPFMC recommended moving forward with two indices to link Pacific halibut PSC to abundance in the Bering Sea, as well as potential control rules to establish PSC limits based on the selected indices. The NPFMC also provided direction on explicit elements and options to consider while developing control rules, and tasked the working group to develop a preliminary analysis using these specific elements and options, which is expected to be available in April 2018.

During its October 2017 discussion, the NPFMC made two modifications to the purpose and need statement for this action, which could have implications regarding interpretation of the objectives of abundance-based PSC management. As noted in the IPHC's [letter to the NPFMC](#) for the meeting, the IPHC continues to support current and additional NPFMC provisions for the directed fishery and for conservation of the spawning stock biomass as part of the need for this action.

Actions by the NPFMC can and do have a direct impact on the directed Pacific halibut fishery and the coastwide Pacific halibut resource. We continue to be concerned about the conservation implications of current levels of bycatch mortality from fisheries managed by the NPFMC, particularly in light of the most recent stock assessment that shows large declines of juvenile Pacific halibut and unlikely near term strong recruitment events. We also continue to believe that comprehensive, independent at sea and dockside monitoring coverage, which provides accurate and precise catch data, is essential.

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