

News Release

May 8, 2012

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COMMISSION RECEIVES REPORT OF EXTERNAL PERFORMANCE REVIEW AND ANNOUNCES FRAMEWORK FOR PUBLIC FEEDBACK

In 2011, the International Pacific Halibut Commission contracted an external review of its structure and function under the Halibut Convention between the United States and Canada. This Performance Review was conducted by CONCUR, Inc. and the Commission has received the final report of the Review:

http://www.iphc.int/documents/review/FINAL_IPHC_Performance_Review-April30.pdf

A public presentation of the report was conducted on May 7th via webcast.

The report identifies a number of recommendations to improve governance processes, increase transparency, and build on the strengths of the Commission to enable it to continue the sustainable management of the halibut resource. Planning and action on several aspects of these recommendations are already underway as a result of decisions made at the Commission's Annual Meeting in January 2012. The Commission's consideration of the report's findings will benefit from stakeholder's views and a public comment period has been established for this purpose. **The public comment period will extend to June 30 and comments can be submitted via email here: Review@iphc.int**

Through the summer 2012, the Commission will carefully review the report taking into account the feedback received during the public comment period before developing a response to the Performance Review. This is expected to include identification of priority areas for implementation and opportunities for further stakeholder participation. Significant discussion on an Implementation Plan is expected to take place at the upcoming Interim and Annual Meetings in late 2012 and early 2013 respectively.

END

Bruce M. Leaman, Executive Director
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LUCKILY SHE ENJOYED FISHING,
AS SHE HAD JUST OPENED
UP ANOTHER CAN OF WORMS.

6/16/12



Eric Olsen, Chair NPFMC
605 West 4th Street Ste 306
Anchorage AK, 99501

May 29, 2012

Agenda Item B: NMFS Report, Observer Program

Dear Chairman Olsen and Members of the Council,

At the June 2010 NPFMC meeting, the Council tasked the Observer Advisory Committee and Council and NMFS staff with developing electronic monitoring (EM) as an alternative tool for fulfilling observer coverage requirements. The Council stated that its intent was for EM "to be in place at the same time as the restructured observer program." The April 2012 proposed rule to implement the restructured observer program does not reflect this commitment. Because the rule fails to include a viable EM option, the analysis to support the restructured observer program fails to adequately assess the logistical, economic, and social impacts of placing observers on the less than sixty foot fixed gear fleet.

Throughout the development of the restructured observer program, we have consistently identified the need for EM as an alternative to human observers for fixed gear vessels less than sixty feet to mitigate the significant social and economic impacts. The EA/RIR/IRFA to implement the restructured observer program indicates that the sablefish/halibut fleet will pay approximately 67% of the costs associated with the partial coverage category. Although this places a substantial burden on these small businesses, we continued to support the goals of the restructured observer program to gather unbiased at-sea data from all sectors and have stated our willingness to pay a fair share of the future observer program costs. We have taken the initiative to operationalize EM to ensure it meets at-sea monitoring needs, is cost effective, and avoids impacts on fishing behavior associated with human observers. At this point, we are willing to provide unbiased at-sea data that meet program goals and to pay more than our fair share of the program costs. What we cannot accept is a program that does not include EM as a viable option for meeting at sea coverage requirements, and relies on supplemental funding, rather than the fee assessed on the fleet, to develop and integrate EM. That, combined with the current dearth of specificity in the deployment plan for the fixed gear fleet, render the program as proposed untenable to our memberships.

We appreciate that the Council has repeatedly directed NMFS to develop EM, and we appreciate the effort the Alaska Fisheries Science Center has committed to the joint industry/agency EM pilot program. We are willing to continue to do all we can to develop a cost effective EM program compatible with the operational constraints of the 1,400 small fixed gear vessels operating off Alaska. At this point we ask that the Council direct NMFS to include in the final rule a commitment to:

1. Dedicating 15- 20% of the fees collected from the industry to develop, implement, and fully integrate EM into the restructured observer program;
2. Providing EM as the preferred monitoring tool for the less than sixty foot sablefish/halibut fleet in 2013 and providing EM as the preferred monitoring tool for all fixed gear vessels by 2016.

Until the restructured observer program includes these two commitments, the undersigned organizations cannot support observer requirements on fixed gear vessel less than sixty feet in length overall.

Respectfully,



Linda Behnken
(Alaska Longline Fishermen's Association)



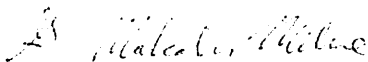
Julianne Curry
Petersburg Vessel Owners Association



Kathy Hansen
Southeast Alaska Fishermen's Alliance



David Polushkin
Kachemak Bay Fisheries



Malcolm Milne
North Pacific Fisheries Association

Jeff Stephan



United Fishermen's Marketing Association

CC. Senator Mark Begich
Senator Lisa Murkowski
Rep. Don Young
Governor Sean Parnell
Commissioner Cora Campbell

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: B - Items

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	Miles Szymanski	Fishermen's Finest Inc.
2	HERMAN SQUARTSOFF	OCHC OUSIAKIE
3	Stephen Tanen	Groundswell Fisheries Movement
4	Linda Behnken	ALFA
5	(my group)	
6	Don Lane	NPFA
7	Paul Olson	The Boat Company
8	DAVE WOOD	US Seafoods, LLC
9	Stephanie Madson	At-sea Processors
10	KEITH BLUON	O'HARA CORP
11	Todd Loomis	Groundfish Forum
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.



Fishermen's Finest, Inc.

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June 6, 2012

Mr. Eric Olsen, Chairman
North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Re: Agenda Item C-1(b): Gulf of Alaska Pacific halibut prohibited species cap (PSC)

Dear Chairman Olson,

Fishermen's Finest operates two trawl catcher processors in the A80 sector. Both of the vessels have fished in the Gulf of Alaska since the mid to late eighties, targeting on various rockfish and flatfish species, as well as atka mackerel and cod. We continue to target groundfish fisheries in the Gulf, even though regulations over the past twenty years have reduced access to many target fisheries. We would like to take this opportunity to comment on the proposed Gulf of Alaska halibut PSC reductions.

Halibut sideboards for the Amendment 80 fleet are based on the fleet's history in the Gulf from 1998 through 2004. The A80 fleet has not been able to achieve its sideboard history due to premature fishery closures. Prior to 2004, catcher vessels had few markets for the DW flatfish on which the CPs targeted. The second seasonal apportionment of DW halibut used to stay open well into May. The fishery was spread out in terms of time and location, without CPs racing. As shoreside markets developed for DW flats in 2004, the increased effort added pressure on the halibut. DW flats closed within the month of April – forcing all vessels to fish starting April 1st when the fish are not well aggregated, and as such, halibut rates are higher. Reducing the halibut will only exacerbate the status quo, since there will be even less halibut in each seasonal apportionment. (See Tables 4-23, 4-32)

We strongly urge the Council to be more deliberate and strategic in its actions to reduce trawl halibut bycatch consumption. This can be done without roadblocking the fleet from responsible bycatch avoidance practices, without reducing revenues, and without increasing halibut rates.

For example, when the A80 fleet was given the Groundfish Retention Standard, the Council understood that the fleet could not increase retention without the tools to end the race for fish. The groundfish retention standard was implemented in 2007, and the A80 coop structure was implemented in 2008. This was a rational way to induce the fleet to improve its practices.

We strongly urge the Council to not reduce halibut to the trawl fleet until the fleet is given tools to manage the halibut more effectively – by way of either deck sorting to reduce mortality, individual bycatch accounts, PSC cooperatives, or full rationalization. There are several more reasons not to reduce halibut at this time:

- Halibut abundance, in terms of numbers, are very high, especially since the 1987 and later year classes. High abundance logically means increased chances of interception for our vessels. If there was less halibut, we would see less incidental catch; this is not the case.
- The decreasing size at age issue has not been linked, either directly or indirectly, to incidentally caught halibut. While it does result in a reduced CEY/GHL for the directed and charter fleets, the groundfish fleets experience the same reductions in catch and revenue when TACs and Directed Fishing Allowances are reduced. Incidental catch needs to the non-directed fishermen are not adjusted downward just because there is less target opportunity for the directed fishermen. We would like to tell the pollock fleet to catch less rock sole, but so far we just haven't gone there. This may serve as a good precedent though!
- Starting in 2007, the A80 fleet was mandated to retain almost all the flatfish it caught, without regard to market consequences. We have mandatory retention limits whether the flatfish are spawning are not. Directed halibut fishermen balk at retaining fish smaller than 32 inches, citing that buyers don't want smaller fish. The 2011 Statewide ex-vessel price for halibut is \$6.50/lb – certainly not the high end of the price; there will be a market for 26 or 28 inch fish. Lowering size limits, and coincidentally increasing retention, for this fleet needs to be further explored.
- The imposition of halibut reductions disproportionately affects the observed fleets. CPs have 100 – 200% observers on board when in the Gulf. CVs have 30-100%. However, the directed halibut and sablefish users self-report discards and bycatch, without adequate or any observer coverage. The fleet that self reports discards, does not have observers on board, and hi-grades by regulation, should not dictate our incidental catch needs.
- Finally, one of the more frequently cited hypotheses for the smaller size at age is competition - both within the halibut species itself, and between halibut and arrowtooth. It seems counter intuitive then to reduce bycatch. Reducing bycatch leaves more small halibut in the water, which creates more competition between halibut and also reduces targeted arrowtooth, another competitor.

June 6, 2012

We would like to recommend the following options which the Council should take positive action:

- A80 sideboards should roll from season to season. This allows us to get back to the management status quo under which all other fleets operate.
- We are not opposed to the CVs having their DW and SW sideboards combined after May 15th, however we are extremely disappointed that the Council did not reinstate combined sideboards for A80 in the 5th season, like the other fleets have and we are used to. The CVs have a competitive advantage over the CPs in 5th and now in the 2nd seasons where deep and shallow water halibut can be combined. This is a large competitive loss for us, and further reduces access to our sideboard history.

The most important recommendation we have for the Council is not to take halibut reductions at this time. If the Council is pressured to do so, then the reductions should not take place until some sort of rationalization is in place. If that is not a procedurally viable option, then reductions should not go into place until 2016, or 2015 at a minimum.

We also recommend that the qualifying years for a rationalization program have an end date of 2012, as everyone is on notice that rationalization is on its way, and the race for history will commence, if it hasn't already.

Thank you for taking the time to consider these comments,

Susan Robinson

Susan Robinson