

# HALIBUT ASSOCIATION OF NORTH AMERICA

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Mr. Simon Kineen  
Council Chair  
North Pacific Fishery Management Council  
605 West 4th Avenue  
Anchorage, AK

September 27, 2019

Re: C1 BSAI Halibut ABM PSC limits – Initial Review

Dear Chairman Kineen and Council Members,

The Halibut Association of North America represents U.S. and Canadian processors in matters of halibut sustainability, market access, and product promotion. Twenty years ago we formed the Processors Advisory Group within the International Pacific Halibut Commission to formalize decades of advice on management issues to the six Commissioners. We enjoy a working relationship with IPHC that has been close and productive.

HANA generally keeps our comments to the Council focused on issues that may impact the sustainability of the North Pacific Halibut stocks. It is under that rubric we offer the following comments on C-1.

The Council's Purpose and Needs statement addresses sustainability explicitly in two sentences: *"The Council is considering abundance-based PSC limits to control total halibut mortality, particularly at low levels of abundance. Abundance based PSC limits also could provide an opportunity for the directed halibut fishery and protect the halibut spawning stock biomass."*

We are concerned that none of the Alternatives in the analysis currently address the extreme low end of the abundance spectrum, the area on the Control Rule slope where directed fishing would be prohibited. Under current management at both the Council and the Commission, that situation -- where halibut biomass is at such low levels that the directed fleet is either highly curtailed with some areas not fishing at all, or it is shut down completely -- the groundfish fleets in the Bering Sea and Aleutians could continue fishing at a floor that wouldn't go below 1,000 mt.

These thresholds are included in the IPHC harvest policy under the 30:20 Control Rule. As the halibut biomass declines, at 30% of the unfished biomass, the directed fishery would be restricted with extremely conservative management measures, which would continue until the stock showed a reversal. At 20% of the unfished biomass, IPHC would prohibit all commercial fishing.

Because they have no jurisdiction over Pacific halibut bycatch in the BSAI and GOA, those removals, as modest as they may be, would continue.

The North Pacific Council has enjoyed a reputation of state-of-the-art management on the largest scale of any regional management councils in the nation. We believe if this extremely rare contingency is not addressed, the final policy will be silent on an issue that could have catastrophic impacts.

This issue -- of creating a truly abundance based policy that would rise and fall with biomass including closures on both sides during the rare possibilities of record low biomass -- was is not new to the ABM discussion, but difficulties encountered that were jurisdictional could not be resolved.

We believe there is merit in using either a performance metric on a revised ABM model (areas to be addressed follow) or including in a preferred alternative and option that would include a truly abundance-based feature specifically for extreme low abundance years.

The ABM model needs to address the IPHC's harvest policy's 30:20 Control Rule, that sets thresholds for the directed fleet severely curtailing removals. We and others encourage the revised analysis to reflect this.

Using these thresholds ( $B_{30}$  to  $B_{20}$ ) choose one along the line that would reduce the current floor level of PSC halibut to a level that is some fraction of that, *in the following year*.

Delaying this action by 14 months eliminates the jurisdiction issue, putting the action squarely within the purview of the Council.

If the biomass does not increase but drops closer to  $B_{20}$  then PSC limits drop further. At some point, but at least a few years after the commercial fleets have stopped fishing and this is undeniably a conservation issue for four states and British Columbia, the PSC limits for Pacific halibut in BSAI would drop to zero.

We will continue working with others on both sides of this issue refine this concept for presenting to the Council in fuller form.

We want to emphasize that this scenario would be the result of an extremely rare set of conditions, prior to which are many decision points at both the Council and the Commission, that could mitigate or avoid its occurrence.

But to craft a policy of abundance-based management on a high-value, prohibited species caught in an important federal fisheries without providing some guidance for when biomass is at extreme lows would be putting the Council in a position of having remained silent on a situation that later required action.

Thank you for your attention to this issue.

Sincerely,

s/  
Peggy Parker  
Executive Director