



CENTRAL BERING SEA FISHERMEN'S ASSOCIATION

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February 3, 2014

Re: C-7 BSAI Halibut PSC

Statement of concerns:

The Central Bering Sea Fishermen's Association (CBSFA) is the management organization for St. Paul Island under the Western Alaska Community Development Quota Program (CDQ). Since the program was created in 1992, the federal government has been awarding various species of fish (CDQ allocations) from the Bering Sea and Aleutian Islands commercial fisheries to CBSFA. In turn, CBSFA manages these allocations to promote social and economic development at St. Paul Island.

Halibut is the lifeblood of the local commercial fisheries in the Pribilof Islands and a major contributor to the local economy. Halibut is also a customary and traditional food of our communities with deep roots and meaning for the Unangan (Aleut) residents.

CBSFA and the people of the Pribilof Islands have grave concerns about the recent dramatic decline in halibut Exploitable Biomass (EBio) and the below average halibut recruitment in the Bering Sea and Aleutian Islands (BSAI), and the resulting continued decrease in halibut available to directed halibut fishermen and other users of halibut. Our ultimate concern is the health of the halibut resource, and that all user groups share equitably in its conservation and sustainability.

The BSAI encompasses the Halibut Regulatory Areas 4A, 4B and 4CDE. As shown in Figure 1 (BSAI EBio, FCEY and Bycatch Mortality) the exploitable halibut biomass available to the directed halibut fishery and other users of halibut has declined from 77.7 million pounds in 2011 to 35 million pounds in 2014.

Correspondingly, the halibut available to the directed halibut fishery – the FCEY – has also dropped precipitously across most of the halibut regulatory areas. In Areas 4A/4B/4CDE, the International Pacific Halibut Commission (IPHC) Blue Line advice has gone from 8.8 million pounds in 2011 to only 2.3 million pounds in 2014. The Blue Line advice for the FCEY is “the harvest available when the Commission's target harvest rates are applied to the current estimate of EBio.”

In Area 4CDE, the adopted FCEY decreased substantially from 3.7 million pounds in 2011 to 1.285 million pounds in 2014. The 2014 IPHC Blue Line advice was a drastically reduced FCEY of only .64 million pounds.

During the same time period, the total halibut bycatch mortality in Area 4CDE has held relatively steady, as shown in Figure 2 (Area 4CDE Removals). The portion of halibut bycatch that is subtracted from the TCEY (Total Constant Exploitation Yield) to calculate the FCEY (Fishery Constant Exploitation Yield) has also held steady at slightly above 2 million pounds. This number consisted of halibut over 32 inches (O32) until 2011, changing to over 26 inches (O26) in 2012. From 2011 to 2013 total bycatch mortality in the whole BSAI region averaged 5.6 million pounds, and total bycatch mortality in Area 4CDE averaged 3.6 million pounds.

In Figure 3 (Area 4CDE Comparison of Removals), the pie charts show the changing ratio of the directed halibut fishery catch to the total bycatch mortality. The pie chart on the left shows the ten-year average is 38.8% for the directed halibut fishery and 58.9% for total bycatch mortality. Using the 2014 IPHC Blue Line advice, the middle pie chart illustrates that the directed halibut fishery removals would be only 14.7% compared to the total bycatch mortality of 83.4%.

The pie chart on the right compares the adopted 2014 FCEY for the directed halibut fishery (25.8%) to the total bycatch mortality estimate (72.6%). The IPHC commissioners decided to implement the downward movement of the FCEY in increments to lessen the negative economic impacts to fishermen and communities, and moved down only half the distance to the Blue Line in 2014, with the anticipation of moving it the rest of the way down in 2015. The future looks devastating for the directed halibut fishery in Area 4CDE.

The current halibut PSC limits (bycatch caps) came from the recommendations of a Council bycatch committee in the late 1980's, when the directed halibut fishery FCEY was around 70 million pounds. While the crab bycatch caps were set to fluctuate with the health of the crab species, the halibut caps were NOT set to fluctuate because of a reported lack of adequate life history information for halibut.

Indeed, as illustrated in Figure 4, if the bycatch caps in the BSAI were reached, to a total of 7.5 million pounds in 2014, there would be only 800,000 pounds of halibut available for the directed halibut fishery in Areas 4A, 4B & 4CDE combined.

In Area 4CDE, under the same scenario, and based on historic averages, 4.9 million pounds of total bycatch would be removed. This would result in a BANKRUPT TCEY balance of MINUS 200,000 pounds! In other words, the removal of halibut by the bycatch users at the level of the cap would EXCEED the IPHC recommended total constant exploitation yield (TCEY) for this halibut regulatory area, and completely shut down the directed halibut fishery.

Obviously, the North Pacific Fishery Management Council (Council) and industry users of halibut do not want to see these scenarios become a reality. They are provided as an example of the need to reassess the uses of halibut in light of the current status of the resource. Given the current decline of the halibut exploitable biomass and below average recruitment – and the recent conservation burden of the reduced TCEY's being solely borne by the directed halibut fishermen and BSAI communities, and not shared by the halibut bycatch users – it is clearly time for the Council, IPHC and the halibut resource users to collectively search for solutions to alleviate this developing inequity, including consideration of recalibrating the bycatch caps for halibut.

Figure 1. BSAI (Areas 4A/4B/4CDE) EBio, FCEY and Bycatch Mortality, 2005-2014

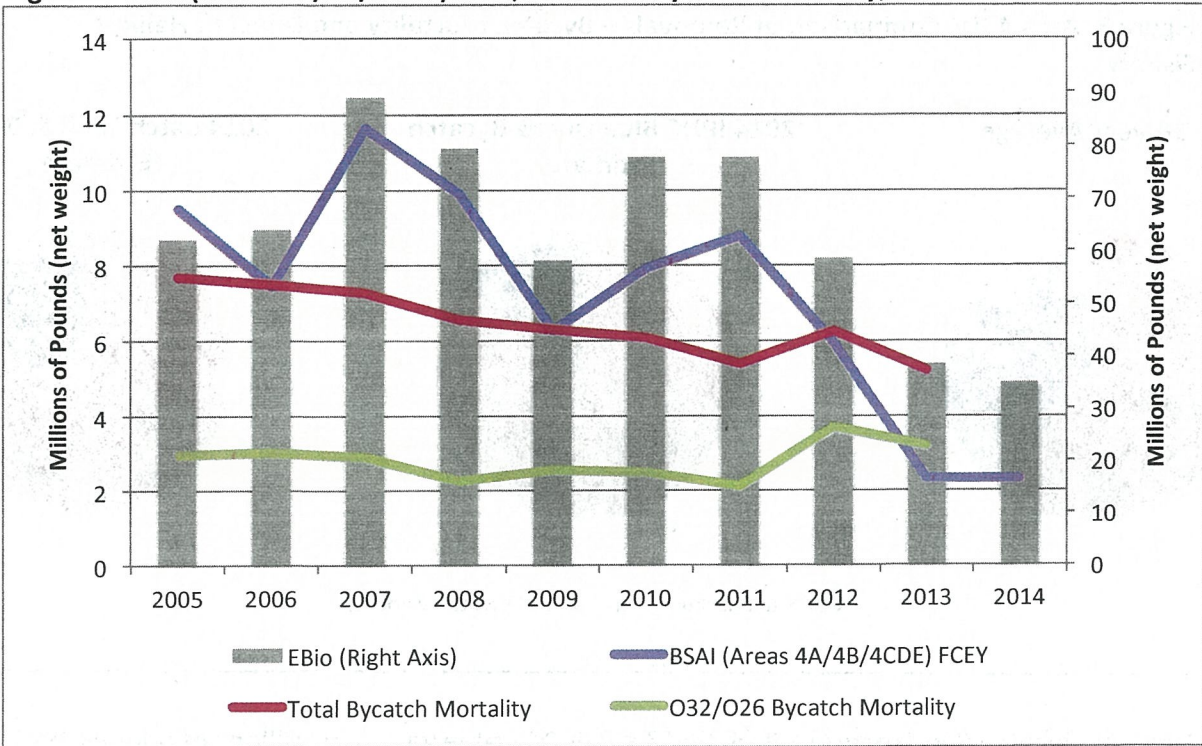
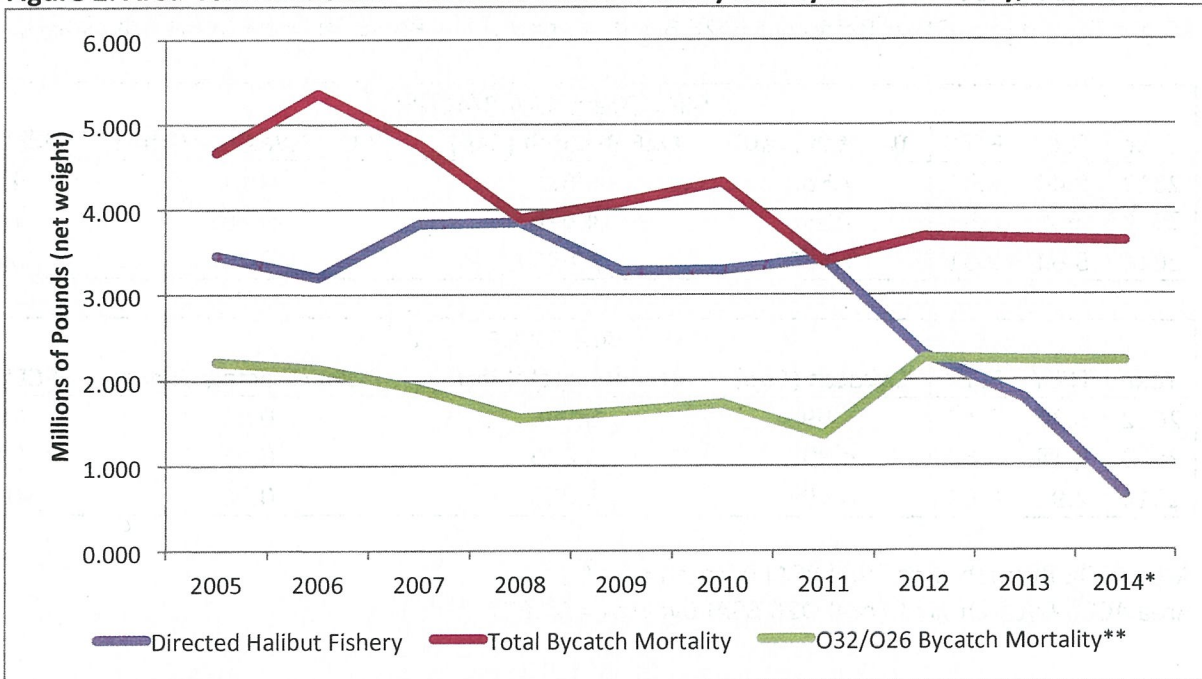


Figure 2. Area 4CDE Removals – Directed Halibut Fishery and Bycatch Mortality, 2005-2014¹



*Values for 2014 are based on IPHC Blue Line and estimated bycatch mortality

**IPHC deducted O32 bycatch mortality from the TCEY until 2011, then changed the deduction to O26 in 2012

¹ Area 4CDE Bycatch Data, 2012 IPHC Bluebook (pp. 195-196)
 Fishery Landings Data, IPHC RARA 2013 (p. 159)
 2013 Bycatch Data, IPHC RARA 2013 (pp. 203-204)

Figure 3. Area 4CDE Comparison of Removals – Bycatch Mortality and Directed Halibut Fishery

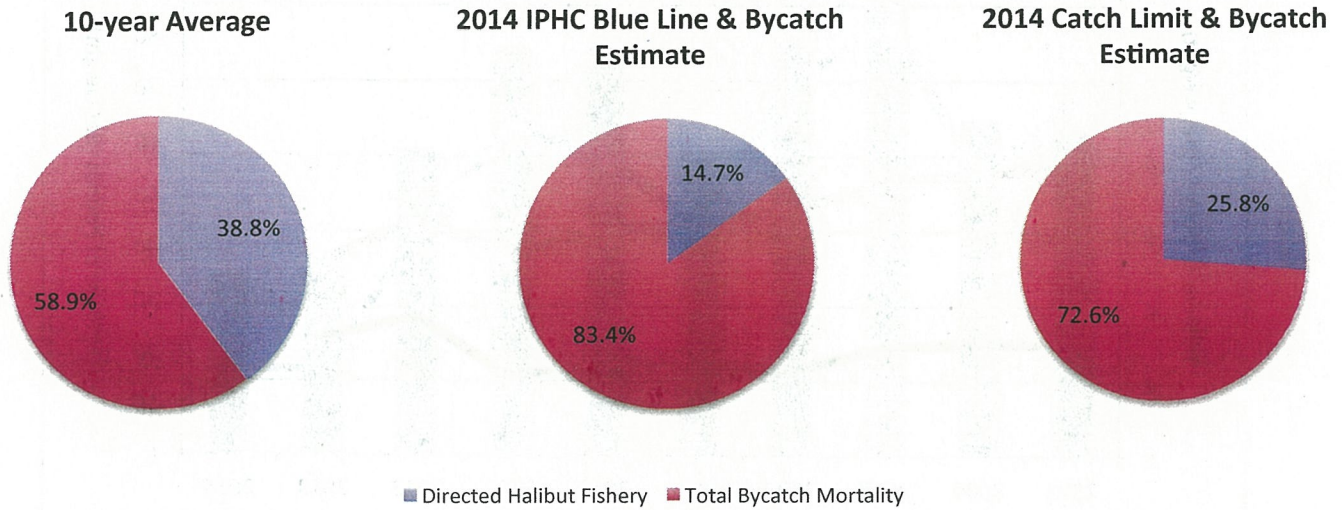


Figure 4. Bycatch Cap Scenario – BSAI and Area 4CDE (table values in millions of pounds, net)

BSAI Halibut PSC Limit: 4,575 mt (round weight) = 7.58 million lbs (net weight)

O26 Bycatch as % of Total Bycatch = 61.03%²

FCEY = TCEY minus Other Removals (O26 Bycatch Removals + Personal Use + Sport + Wastage)

Year	TCEY	FCEY	BSAI (Areas 4A/4B/4CDE)			
			Bycatch (Cap)	O26 Bycatch (Cap)	P.Use/Wastage/Sport	FCEY (Cap)
2012	9.44	5.91	7.580	4.626	0.11	4.708
2013	6.2	2.32	7.580	4.626	0.26	1.319
2014	5.64	2.31	7.580	4.626	0.21	0.807

Year	TCEY	FCEY	Area 4CDE			
			Bycatch (Cap)	O26 Bycatch (Cap)	P.Use/Wastage/Sport	FCEY (Cap)
2012	4.74	2.47	4.999	3.036	0.04	1.661
2013	3.18	0.85	4.999	3.036	0.11	0.034
2014	2.91	0.64	4.999	3.036	0.08	-0.206

Area 4CDE Bycatch % of Total BSAI Bycatch = 65.95%

Area 4CDE Bycatch % of Total O26 BSAI Bycatch = 65.63%

² All percentages based on IPHC Bycatch Data, IPHC Bluebook 2013 & 2014