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INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

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27 September 2016

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

Dear Mr. Hull:

Thank you for the North Pacific Fishery Management Council's (the Council) continued attention to Pacific halibut management and continued coordination with the International Pacific Halibut Commission (IPHC or Commission). There are several halibut-related agenda items at the Council's October 2016 meeting, and the IPHC is commenting on two of them here:

- 1) the *Halibut Management Framework*; and
- 2) abundance-based management of Pacific halibut bycatch.

The IPHC requests a meeting between Council and IPHC representatives before the Council's December 2016 meeting. This committee should discuss abundance-based management of Pacific halibut bycatch prior to a range of alternatives being adopted for detailed analysis. This and other topics could benefit from the Halibut Management Framework's recommendation for increased coordination and communication between the Council and the IPHC.

1) Halibut Management Framework

As stated in our letter to the Council dated 25 February 2016, the IPHC supports the Council's efforts through the Halibut Management Framework to increase coordination and communication between the IPHC and the Council. Given our respective jurisdictions over the Pacific halibut resource and its fisheries, this coordination, communication, and collaboration is crucial if we are both to ensure that our respective mandates are met and our stakeholders' needs are addressed.

In the spirit of the Halibut Management Framework document, the IPHC requests a meeting between Council and IPHC representatives before the Council's December 2016 meeting. The main objectives of such a meeting would be to discuss the following:

- 1) the coordination of Pacific halibut research efforts among the Council, the National Marine Fisheries Service, and the IPHC;
- 2) ways to secure directed Pacific halibut fisheries in Alaska, including use of abundance-based management of Pacific halibut bycatch;
- 3) the implications of the Council's Pacific halibut management recommendations and their effects beyond Alaska into Canada and the U.S. West Coast.

2) *Abundance-based Management (ABM) of Pacific Halibut Bycatch*

The IPHC is encouraged by the efforts of the Council and its ABM working group to address Pacific halibut bycatch (also called prohibited species catch [PSC]) in the Bering Sea and Aleutian Islands (BSAI). The use of ABM has the potential to set more appropriate harvest limits for directed Pacific halibut fisheries and for fisheries with Pacific halibut bycatch, balancing the needs for both.

The ABM working group's "*BSAI Halibut Abundance-based PSC limits discussion paper*" (September 2016) translates the Council's purpose and need statement into objectives meant to guide the development of appropriate indices of abundance, potential harvest control rules, and management approaches. The Council's purpose and need statement for ABM notes:

The current fixed yield based halibut PSC caps are inconsistent with management of the directed halibut fisheries and Council management of groundfish fisheries, which are managed based on abundance. When halibut abundance declines, PSC becomes a larger proportion of total halibut removals and thereby further reduces the proportion and amount of halibut available for harvest in directed halibut fisheries. Conversely, if halibut abundance increases, halibut PSC limits could be unnecessarily constraining. The Council is considering linking PSC limits to halibut abundance to provide a responsive management approach at varying levels of halibut abundance. The Council is considering abundance-based PSC limits to control total halibut mortality and protect the halibut spawning stock biomass, particularly at low levels of abundance. The Council recognizes that abundance-based halibut PSC limits would increase and decrease with changes in halibut abundance.

Using this purpose and need statement the ABM working group has developed several objectives. These objectives are presumably intended to guide development of a range of reasonable alternative management measures for analysis, including harvest control rules. The IPHC is concerned that the ABM working group's proposed objectives dampen the intent of the Council's purpose and need statement. The IPHC is also concerned that the ABM working group's proposed objectives do not sufficiently address the Magnuson-Stevens Fishery Conservation and Management Act's directive to reduce bycatch to the extent practicable.

To balance the needs of the directed Pacific halibut fisheries and other groundfish fisheries in the BSAI and achieve the intent of the Council's purpose and need statement, the IPHC recommends the Council prioritize two objectives when considering management measures. The objectives should include (1) greater emphasis on protecting spawning stock biomass at low levels of halibut abundance, and (2) an increased emphasis on providing opportunity for the directed halibut fishery via a measure like ABM. These objectives are consistent with the intent of the purpose and need statement and should not unnecessarily constrain NPFMC groundfish fisheries in times of high Pacific halibut abundance.

In addition to prioritizing objectives for ABM, the IPHC encourages the Council to further develop incentives to reduce Pacific halibut bycatch. This is consistent with the mandate of National Standard 9 of the Magnuson-Stevens Fishery Conservation and Management Act

(2007; Title Three Section 301) to reduce bycatch to the extent practicable. It could be accomplished a number of ways, and should clearly involve input from affected stakeholders.

The Council and the IPHC share a common goal of protecting spawning stock biomass of Pacific halibut at low levels of abundance and of providing opportunity for the directed Pacific halibut fishery, while minimizing bycatch to the extent practicable. Ultimately, this issue affects more than just the BSAI because of the migratory nature of Pacific halibut. Because of our shared goals and the interrelated jurisdictions between our agencies, bycatch management measures like ABM could benefit from increased coordination between the Council and the IPHC before a range of alternatives are adopted in December, 2016.

In closing, the IPHC welcomes the opportunity to work more closely with the Council on Pacific halibut matters. As such, we request a meeting between Council and IPHC representatives before the December 2016 Council meeting to further coordinate on the matters raised in this letter.

Sincerely,



Chairperson
International Pacific
Paul Ryall,
Halibut Commission

cc: IPHC Commissioners
Dr. Wilson, Executive Director IPHC
Mr. Oliver, Executive Director NPFMC