

November 30, 2021

Simon Kinneen, Chairman
North Pacific Fishery Management Council
Anchorage, Alaska

Submitted electronically

Regarding: C2 – Halibut Abundance-Based Management

Dear Mr. Kinneen and members of the Council:

We, the undersigned Alaskans, strongly support meaningful reduction in halibut bycatch, and for the upcoming Council meeting, that means we strongly support Alternative 4 – the only of the four abundance-based management (ABM) of halibut bycatch alternatives before the Council that would provide any meaningful reduction to halibut bycatch and therefore any meaningful benefit for Alaska’s halibut fisheries.

Never before have Alaskans from all regions and sectors come together in this way to support Council action to protect our fisheries and communities.

BACKGROUND

Alaska is famous for its bountiful fisheries resources, including salmon, halibut, crab, sablefish, and herring. It is also well-known for its sustainable stewardship of fisheries resources. For more than half a century, with inevitable fluctuations, the resources off our shores have been successfully managed, and have provided food and livelihoods for our people and communities.

However, one of the most iconic and valuable of our resources – Pacific halibut – is facing a crisis that threatens the way of life for commercial and sport halibut fishermen, and the economic driver for halibut-dependent communities throughout coastal Alaska.

The Bering Sea (BS) halibut fishery has been crippled by the devastating direct effects of bycatch by large factory trawlers that come north from Seattle to fish for various groundfish species, which are processed at sea and primarily exported to Asia. Bycatch and discard of halibut during those BS groundfish fisheries also affects the availability of halibut to all users throughout the species’ range.

Halibut stocks have declined substantially over the past 30 years. As halibut stocks declined, bycatch mortality consumed a larger and larger share of the available halibut. Bycatch mortality – dead halibut – is “taken off the top” by the managers at the International Pacific Halibut Commission (IPHC), and the commercial and sport (“directed”) halibut fisheries get whatever is left.

This is unfair to Alaska and Alaskans.

Bycatch limits must be reduced for Alaska-based commercial and sport fisheries to survive. The future of halibut IFQ holders, sport charter operations, and communities hangs in the balance.

HERE ARE THE FACTS:

- **Every Alaskan pays the price for bycatch.**
- Since 2015, trawlers have killed and discarded more than 3.1 million halibut in the Pribilof Island area of the Bering Sea (Area 4CDE). This is eight times more halibut than the Pribilof Island halibut fishery landed, based on mean weight. At an average price of \$5.10 per pound, this amounts to \$56 million in ex-vessel revenue lost by local halibut fishermen and fishing communities in the Pribilof Island area alone.
- For 2021, the IPHC projects that **bycatch will account for 63% of all halibut removals** in Area 4CDE, based on the 3-year average of bycatch mortality. The directed fishery landings will receive only 35%.
- If bycatch users take their current full limit, **bycatch would account for 97.5% of halibut removals in Area 4CDE.** The directed fishery would receive just 1.7%. This means bycatch users would receive more than 5 million pounds of halibut, leaving only 90,000 pounds for the halibut fishermen.
- There is a **net migration of halibut from the Bering Sea to the Gulf of Alaska**, hence halibut bycatch directly affects all who depend on halibut in the Gulf as well as the Bering Sea.
- The recent average annual catch limit for the **entire** Southeast Alaska commercial halibut fishery is LESS than the annual Bering Sea halibut bycatch.
- In Southcentral ports like Homer and Kodiak, **commercial and sport harvest of halibut has declined by more than 50% since 2010** to conserve the halibut resource, while halibut bycatch limits have stayed the same.
- Sport charter operations in all areas of Alaska have reduced allowable halibut size, or lost one or more charter days **per week, with each lost day** representing thousands in lost revenue to that small business alone, along with associated tax income to the community, and related local expenditures by the businesses and their clients.
- Each time an Alaska business or community loses income as a response to halibut stock changes, those **businesses and communities financially subsidize the trawl fleets,**

whose halibut bycatch is guaranteed. This subsidy is inequitable, unsustainable and is not supported by Alaska's fishermen, fishing businesses and communities.

- Bycatch savings through implementation of an ABM program may provide meaningful differences in annual allocation to the sport sector.

ACTION NEEDED

NPFMC is currently considering an ABM system for the Amendment 80 sector (bottom trawlers) that would tie bycatch limits to halibut abundance, with final action on Halibut ABM at its December meeting. ABM means that as the halibut resource rises or falls, the limits on bycatch by the bottom trawl sector would rise or fall, as the catch limits do for the directed halibut fisheries.

We strongly support Alternative 4 – the only alternative being considered that would provide any meaningful benefit to the directed fishery.

Alternatives 2 and 3 do relatively little to reduce the bottom trawlers' bycatch limits at low levels of halibut abundance, and offer insignificant improvement from the status quo.

Meaningful ABM creates badly needed conservation incentives. These incentives are lost entirely under the current non-constraining PSC limits because groundfish trawlers feel no effects from low abundance — and have no incentive to reduce halibut bycatch or take steps to conserve the halibut resource — because the impacts of low abundance are borne entirely by halibut commercial and sport fishermen.

We ask — and expect — the State of Alaska to use its leadership position at the NPFMC to select Alternative 4.

Alaskans believe in wise resource management and protecting the fisheries that Alaskans rely on. We ask that the State of Alaska take a leadership position in advancing these principles and selecting Alternative 4.

Sincerely,

Ben Mohr, Executive Director, Kenai River Sportfishing Association
Caleb Martin, Executive Director, Alaska Fish and Wildlife Conservation Fund
Karen Gillis, Executive Director, Bering Sea Fishermen's Association
Louis Cusack, Director, Safari Club International Alaska Chapter
Malcolm Milne, President, North Pacific Fisheries Association
Nicole Schmitt, Executive Director, Alaska Wildlife Alliance
Theresa Peterson, Fisheries Policy Director, Alaska Marine Conservation Council