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INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

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EL2025006
 21 February 2025

Angel Drobnica
 Chair, North Pacific Fisheries Management Council (NPFMC)
 Send via email: adrobnica@apicda.com
 CC: David Witherell, NPFMC Executive Director
 Sent via email: david.witherell@noaa.gov

RE: IPHC-2025-AM101-PropC2 – addressing concerns regarding localized depletion around St. Matthew Island

Dear Ms. Drobnica,

On behalf of the International Pacific Halibut Commission (IPHC), I am writing to bring to the attention of the North Pacific Fishery Management Council (NPFMC) Proposal [IPHC-2025-AM101-PropC2](#), which was submitted for consideration at the 101st Session of the IPHC Annual Meeting (AM101). The proposal, prepared by Mr. Shawn McManus, expresses concerns regarding localized depletion of Pacific halibut around St. Matthew Island and proposed regulatory amendments to the application of commercial fishery limits in IPHC Regulatory Areas 4C and 4D.

The Commission requested that the IPHC Secretariat communicate the details of this proposal to the NPFMC for awareness and consideration, noting specifically that the Commission views the proposal as falling under the purview of the NPFMC.

Summary of Proposal IPHC-2025-AM101-PropC2

The proposal advocates for the removal of the provision allowing Pacific halibut IFQ/CDQ quota holders in Area 4C to transfer their quota into Area 4D north of 60°N latitude and east of 174°W longitude. The proponent cites concerns that a significant proportion of the Area 4CDE commercial Pacific halibut landings, up to 70% annually, are occurring near St. Matthew Island, potentially leading to localized depletion.

The proposal references:

- The 2005 NPFMC decision that allowed quota transfers between Areas 4C and 4D;
- The assumption made in 2005 that the likelihood that the localized depletion problem in Area 4C would simply be transposed to Area 4D is low; and
- Recent IPHC data indicating that a substantial portion of 4D landings are concentrated around St. Matthew Island.

The proponent argues that fishing pressure has not been effectively dispersed and that changes in environmental conditions, including increased killer whale depredation, have further exacerbated the issue.

IPHC Considerations and Request to NPFMC

The IPHC takes concerns about localized depletion seriously and recognizes the need for a coordinated approach with the NPFMC to address management challenges in Regulatory Areas 4C and 4D. The Commission has not taken a formal position on the proposal but seeks to advise the NPFMC of its contents and request the Council's review and consideration of the proposal in light of its jurisdiction over the IFQ/CDQ regulations.

We appreciate your attention to this matter and look forward to further discussions on how best to ensure sustainable management of Pacific halibut in these areas. Please do not hesitate to contact us if you require any further information.

Yours sincerely,

David T. Wilson

David T. Wilson, Ph.D.,
Executive Director
International Pacific Halibut Commission

CC:

Jon Kurland, IPHC Chairperson;
Mark Waddell, IPHC Vice-Chairperson;
IPHC Commissioners Robert Alverson, Richard Yamada, Neil Davis, Peter Degreef.

Encl.

IPHC-2025-AM101-PropC2



IPHC Fishery Regulations:

Application of Commercial Fishery Limits (Sect. 12) – addressing concerns regarding localized depletion around St. Matthew Island

PREPARED BY: SHAWN McMANUS (COMMERCIAL FISHER) (10 DECEMBER 2024)

Directed Commercial ☒ Recreational ☐ Subsistence ☐ Non-directed commercial ☐ All ☐
 All Regulatory Areas ☐ All Alaska Regulatory Areas ☐ All U.S. Regulatory Areas ☐
 2A ☐ 2B ☐ 2C ☐ 3A ☐ 3B ☐ 4A ☐ 4B ☐ 4CDE ☒

PURPOSE

To propose closing the one-way door for halibut IFQ/CDQ holders from halibut Area 4C into Area 4D North of 60 degrees North latitude and East of 174 degrees West longitude.

EXPLANATORY MEMORANDUM

Through several years of recent fishing experience as well as supporting IPHC data, I feel that St. Matthew Island waters are facing localized depletion.

Beginning in 2005, the North Pacific Fishery Management Council (NPFMC) made a recommendation to change the IPHC Regulatory Area 4 Catch Sharing Plan and the IFQ/CDQ regulations to incorporate the NPFMC's recommendation that IPHC Regulatory Area 4C Pacific halibut IFQ or CDQ may be harvested in either IPHC Regulatory Area 4C or in IPHC Regulatory Area 4D.

At that time, the NPFMC based its decision(s) on presentations such as "Area 4D has approximately ten times more fishing grounds at 5,605 square nautical miles than Area 4C at 561 square nautical miles". However, recent IPHC data (see [Appendix A](#)) shows that nearly 70% or one million pounds of all 4CDE landings are occurring each year just off the 28 mile long (138 square mile) island of St. Matthew. Keep in mind that for the most part, only half of the 28-mile-long island supports Pacific halibut abundance.

In 2005, the IPHC noted "that the ratio of halibut harvest to available fishing grounds would remain much lower in Area 4D than Area 4C. Therefore, the likelihood that the localized depletion problem in Area 4C would simply be transposed to Area 4D would remain low". Given this quoted assumption, I feel the IPHC is more than culpable in what I feel is the localized depletion of halibut in St. Matthew Island waters. Therefore, I implore the IPHC to take responsibility in this matter by pushing for regulatory change at both the IPHC and NPFMC bodies with feverish haste. A lot of environmental changes have occurred in the 20 years since this assumption. Killer whale depredation has exploded exponentially to the point where the vast majority of fishing on the IPHC Regulatory Area 4D edge is nothing more than a lesson in futility. This proposal will spread some fishing concentration away from the island of St. Matthew thus reducing the amount of localized depletion.

PROPOSED REGULATORY LANGUAGE

This proposal would remove the provision under Section 12 (Application of Commercial Fishery Limits), par. 6:

12. Application of Commercial Fishery Limits

[...]

- (6) Notwithstanding the fishery limits described in Section 5, the total allowable catch of Pacific halibut that may be taken in the IPHC Regulatory Area 4D directed commercial fishery is equal to the combined annual fishery limits specified for IPHC Regulatory Areas 4C and 4D. The annual IPHC Regulatory Area 4C fishery limit will decrease by the equivalent amount of Pacific halibut taken in IPHC Regulatory Area 4D in excess of the annual IPHC Regulatory Area 4D fishery limit.

SUPPORTING DATA AND OTHER INFORMATION

[Appendix A](#) provides supplementary data provided by the proposal proponent.

Link to Federal Register, Proposed Rule from 5 May 2025:

- <https://www.federalregister.gov/documents/2005/05/05/05-9003/pacific-halibut-fisheries-fisheries-of-the-exclusive-economic-zone-off-alaska-individual-fishing>

RECOMMENDATIONS

That the Commission:

- 1) **NOTE** regulatory proposal IPHC-2025-AM101-PropC2 that proposes closing the one-way door for halibut IFQ/CDQ holders from halibut Area 4C into Area 4D North of 60 degrees North latitude and East of 174 degrees West longitude.

APPENDICES

[Appendix A](#): Supplementary data provided by the proposal proponent.



APPENDIX A
SUPPLEMENTARY DATA PROVIDED BY THE PROPOSAL PROPONENT.

<u>Year</u>	<u>4C landings</u>	<u>4C vessels fishing</u>	<u>4D total landings</u>	<u>4D vessels fishing</u>	<u>St Matthew landings</u>	<u>St. Matthew vessels fishing</u>	<u>4E landings</u>	<u>4E vessels fishing</u>	<u>4CDE landings (summed)</u>
2018	492,845	24	824,964	34	597,486	17	95,000	27	1,412,809
2019	482,048	24	1,035,691	39	803,219	20	120,000	31	1,637,739
2020	103,803	7	1,411,823	36	1,194,025	19	93,000	18	1,608,626
2021	197,226	7	1,145,724	29	1,010,631	18	41,000	16	1,383,950
2022	374,754	7	1,176,727	29	1,049,660	19	20,000	7	1,571,481
2023	319,149	10	930,563	32	836,235	19	5,000	4	1,254,712

<u>Year</u>	<u>4C Regulatory limit</u>	<u>4D Regulatory limit</u>	<u>4E Regulatory limit</u>	<u>4CDE Combined limit</u>	<u>% of Total limit landed 4CDE</u>	<u>% of all vessels fishing in 4D fishing at St Matthew</u>	<u>% of all 4D landings occurring at St. Matthew</u>	<u>% of all 4CDE landings occurring at St. Matthew</u>
2018	752,000	752,000	196,000	1,700,000	83%	50%	72%	42%
2019	910,000	910,000	220,000	2,040,000	80%	51%	78%	49%
2020	766,000	766,000	198,000	1,730,000	93%	53%	85%	74%
2021	738,000	738,000	194,000	1,670,000	83%	62%	88%	73%
2022	920,000	920,000	220,000	2,060,000	76%	66%	89%	67%
2023	900,000	900,000	220,000	2,020,000	62%	59%	90%	67%

Source: IPHC. 2024. [Table IPHC-2024-TSD-038](#): Commercial landings from St. Matthew Island and IPHC Regulatory Areas 4C/4D, Accessed [9 December 2024].

Notes:

- See metadata for description of St. Matthew area and other details. All commercial landings and limits in net lbs; 2023 landings preliminary as of January 2024.
- 4D CDQ and IFQ quota can be shifted to 4E CDQ, 4C quota can be shifted to 4D.