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INTERNATIONAL PACIFIC HALIBUT COMMISSION

C1 IPHC Letter to NPFMC EXECUTIVE DIRECTOR
OCTOBER 2019 DAVID T. WILSON

ESTABLISHED BY A CONVENTION BETWEEN CANADA

AND THE UNITED STATES OF AMERICA

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Mr. Simon Kinneen, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

Dear Chairman Kinneen,

The Commission continues to closely follow the development of Council alternatives for Abundance Based Management of Pacific halibut Prohibited Species Catch limits and the analysis of those alternatives. While recognizing the extensive work completed by the working group in support of "Initial Review draft BSAI Halibut Abundance-based Management (ABM) of PSC Limits" for the October Council meeting, we encourage the Council to address the following concerns raised by our staff prior to making any final decisions on this important issue:

There are several assumptions in the simulation modelling that may severely underestimate the effects of PSC limits on the directed Pacific halibut fishery. These include three important components of the IPHC's current management strategy that are missing from the simulation:

- 1) The IPHC accounts for U26 mortality in determining the annual TCEY via the Spawning Potential Ratio (SPR) calculated using all sizes and sources of Pacific halibut mortality. The simulation model relies on a constant regression of total mortality to spawning biomass (page 215), which does not account for U26 mortality in the annual calculation of the TCEY. Additionally, this regression uses observations from a period of time that implemented a different harvest policy than the current SPR-based approach, which may not be relevant to management decisions in the future.*
- 2) The IPHC uses the most recent modelled survey data to allocate a fraction of the TCEY to each IPHC Regulatory Area. The simulation assigned a fixed percentage of the coastwide TCEY based on the historical average (page 210), to allocate TCEY to the Bering Sea/Aleutian Islands area. This approach does not allow the allocation to vary with the relative abundance inside and outside the Bering Sea.*
- 3) The IPHC has a 30:20 relative spawning biomass harvest control rule, where the target level of fishing intensity (SPR) is sharply reduced when the spawning stock drops below the trigger point of 30% relative biomass. No control rule was modelled in the simulation, and the spawning biomass was simulated to be much lower than present levels. Those simulated conditions should cause large reductions to the fishing intensity (SPR) via reductions to the TCEY and therefore the directed Pacific halibut fishery.*

In addition, a very simple assumption was made regarding the treatment of PSC usage relative to the simulated limits. The rate of usage was fixed at a constant proportion (page 214), meaning that if the simulated PSC limits go down greatly, the usage also goes down to exactly the same degree. This is likely unreasonable, as actual usage would not be constrained, under many possible reduced limits, and the actual realized PSC usage may remain the same with reduced

PSC limits, resulting in an increasing proportion of PSC usage. The effect of increased usage rates at reduced PSC limits on the directed Pacific halibut may be very important.

Without these crucial feedback components, it is currently impossible to evaluate the relative effects on the Pacific halibut stock and directed fishery among alternatives. The Commission encourages the Council to recognize the significant progress made and provide the working group with additional time to improve the simulation methods in order to provide for a more accurate evaluation of the effects of ABM alternatives on the Pacific halibut stock and directed fishery.

Sincerely,



Chris Oliver
Chairperson
International Pacific Halibut Commission

cc: Commissioner Robert Alverson
Commissioner Neil Davis
Commissioner Peter DeGreef
Commissioner Richard Yamada
Commissioner Paul Ryall