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INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

EXECUTIVE DIRECTOR
DAVID T. WILSON
2320 W. COMMODORE WY, STE 300
SEATTLE, WA 98199-1287

TELEPHONE:
(206) 634-1838

FAX:
(206) 632-2983

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Agenda Item G.1.a
Supplemental IPHC Letter 2
June 2017

Mr. Herb Pollard
Chair, Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

Re: Commercial derby fishery in IPHC Regulatory Area 2A

Dear Mr. Pollard:

The International Pacific Halibut Commission (IPHC) notes that the Pacific Fishery Management Council (Council) is reviewing the Pacific halibut Catch Sharing Plan (CSP) for Regulatory Area 2A during the remainder of this year.

In conjunction with reviewing the CSP, the IPHC recommends for the Council's consideration a change in the management of the non-tribal, directed commercial Pacific halibut fishery in Regulatory Area 2A. This fishery is one of the few remaining derby-style commercial fisheries in the United States of America, concentrating effort into as few as two days of fishing each year at current stock levels.

The IPHC sees no compelling reason to retain the directed commercial Pacific halibut fishery as a derby-style fishery, but a number of advantages in shifting to a management system that reduces the concentration of fishing effort and eliminates or reduces the race to fish. Potential advantages include:

1. Safety. The current derby system offers no flexibility as to when fishing takes place, creating pressure to attempt fishing even in poor weather and dangerous conditions. The U.S. Coast Guard has frequently commented at IPHC meetings in support of moving away from the derby fishery for this reason, and the Coast Guard provided similar input at the Council's March 2017 meeting. We believe that a system offering more flexible fishing opportunities is inherently safer for everyone on the water, and that this is the primary reason for change.
2. Reduced wastage. The current derby system is essentially a race for fish, where fishers have an incentive to set as much gear as possible during the short time available for fishing. When the fishing is good, this leads to more regulatory discards as trip limits are reached than would be the case under a system where the fishers had time to more carefully calibrate their effort to applicable limits. Mortality from these regulatory discards (termed 'wastage' in IPHC management) represents an unnecessary loss to the resource.
3. Flexibility for fishers and processors. Under the current derby system, fresh Pacific halibut from Regulatory Area 2A is delivered and comes to market in a tightly defined period of time, limiting the ability of fishers and processors to influence or react to market forces. A management system with more flexibility regarding fishing days would allow fishers and processors more latitude in managing their industry sector.

Other than maintaining access to the resource by the commercial Pacific halibut fishery, the IPHC does not recommend a particular management system to replace the derby for the 2A non-tribal, directed commercial Pacific halibut fishery. The IPHC supports a reduction in the concentration of fishing effort, and eliminating the race to fish, as a guiding principle for any changes that are made.

We recognize the challenges that shifting to a new management system would entail in order to ensure equitable use and effective management of the resource, and that it would take some time to develop and implement changes. In addition to the Council, action would be required by IPHC, the U.S. National Marine Fisheries Service, and the various State agencies. For our part, IPHC stands ready to engage in the process and to support it with scientific advice.

The IPHC looks forward to working with the Council and Council staff to continue our strong partnership for sustainable management of the Pacific halibut resource.

Sincerely,



Dr. David T. Wilson
Executive Director, IPHC

cc: IPHC Commissioners
Charles Tracy, PFMC
Michael Burner, PFMC
Kelly Ames, PFMC