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INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

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October 30, 2008

Agenda Item F.3.f Supplemental IPHC Letter November 2008

Mr. Donald Hansen, Chair
Pacific Fishery Management Council
7700 N.E. Ambassador Place, Suite 101
Portland, OR 97220-1384

Re: November 2008 Agenda Item F.3 – Trawl Rationalization

Dear Chairman Hansen:

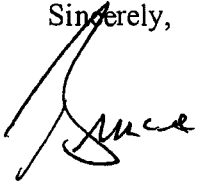
The staff of the International Pacific Halibut Commission (IPHC) has reviewed the Trawl Rationalization analyses as it pertains to management of Pacific halibut bycatch. We offer the following comments for your consideration:

1. Halibut Individual Bycatch Quota (IBQ) – The Council has an option for an IBQ program within Amendment 20. The IPHC staff strongly supports this option. As we have observed in the trawl fishery in British Columbia, these types of programs provide the fishing industry with the necessary tools to reduce the bycatch of nontarget and prohibited species, including halibut. A strong observer presence is required to enable the necessary monitoring of bycatch. The rationalization plan discusses the need for a high level of observer coverage, not only for the IBQ option but also for the overall program. This will undoubtedly be an expensive component but is necessary to fully realize and verify the potential efficiencies available from rationalization.
2. Basis of trawl allocation for IBQs – The latest proposal by the Washington Department of Fish and Wildlife is to set the permissible trawl bycatch as a proportion of the Total CEY from 2005-2006 of ~15%. The conclusion in the analysis is that, under IQs, the trawl fishery should be able to reduce its halibut bycatch over time. However, we suggest that the Council consider the same framework for bycatch control as is followed in other jurisdictions. That is, the bycatch should be identified in the form of a Prohibited Species Catch (PSC) limit, not an allocation. The IPHC and other agencies do not recognize halibut bycatch mortality as an allocation, both because it is conceptually incorrect from a yield perspective, and an allocation of halibut can only be made for retention by legal halibut gear (hook and line). The PSC limit should also be associated with a mechanism, timeline, and target for reducing it from the initial level. A PSC limit should not be tied to the CEY of adult halibut because the abundance of sub-legal halibut is not indexed by the CEY of legal-sized halibut. Instead, the procedure followed in other jurisdictions is to identify the PSC limit for non-target

fisheries and implement procedures to reduce that limit over time, to the benefit of the directed sport, commercial and treaty tribal fisheries.

Gregg Williams of the IPHC staff will be attending the Council meeting and can elaborate on these topics if needed.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce", written over the word "Sincerely,".

Bruce M. Leaman
Executive Director

cc: Commissioners