INTERNATIONAL PACIFIC HALIBUT COMMISSION

DIRECTOR
BRUCE M. LEAMAN

P.O. BOX 95009
SEATTLE, WA 98145-2009

TELEPHONE
(206) 634-1838

FAX:
(206) 632-2983

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AND THE UNITED STATES OF AMERICA

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Mr. Don Hansen, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Re: March 2009 PFMC Meeting, Agenda Item G3 – Halibut IBQ

Dear Don:

The staff of the International Pacific Halibut Commission (IPHC) has reviewed the recommendation for a methodology to establish an Individual Bycatch Quota (IBQ) for the rationalized west coast trawl fishery. We offer the following comments and recommendations.

1. **Use historical bycatch as a basis for the IBQ.** Instead of tying this method to the CEY, we recommend the Council state the IBQ as an average of the actual bycatch mortality over a recent time period, such as the most recent three or five years. Reductions could then be applied to that average. With changing assessment methodologies and harvest policies, CEY can be a dynamic index which could prompt unintended changes to the IBQ. In addition, the added step of conversion from legal-size bycatch to total bycatch unnecessarily complicates the process. Using historical bycatch mortality is straightforward, and the Council can promote additional conservation by applying a target reduction, such as 50 percent, to that average. For example, we note that halibut trawl bycatch mortality has averaged approximately 350,000 pounds during 2003-2007 (Hastie and Wallace 2008). We suggest the Council set an initial IBQ at 50% of this average, or 175,000 pounds. Experience with the Canadian trawl fishery has shown that this level of reduction can be accommodated and exceeded when an IBQ program is adopted.

   The Canadian trawl fishery is very similar in character to that in Area 2A. IBQs for the B.C. trawl fishery were introduced in 1996 and have remained in place since. The impetus for the IBQ program was associated with the introduction of a comprehensive mandatory observer program for this fleet, to address unknown levels of discarding of both target and non-target species. In the case of halibut, an additional incentive came from the results of a joint Canada-U.S. Halibut Bycatch Work Group that was created at the Commission's 1991 Annual Meeting. This work group identified targets and schedules for reduction of halibut bycatch mortality in non-target fisheries. For Canada, the Canadian Department of Fisheries and Oceans (DFO) identified a target of at least a 50% reduction in bycatch mortality for its trawl fisheries.

The bycatch mortality of Pacific halibut in the Area 2B trawl fishery in 1991 was 1.992 Mlb. To achieve a 50% reduction in mortality the DFO established an administrative cap of 1.0 Mlb of bycatch mortality that was apportioned as IBQs to each vessel on the basis of recent catch history and area of activity. These IBQs were fully transferrable among vessels in an open-market framework. There was no allocation of bycatch mortality at the IPHC level. Instead, the DFO simply used the 1.0 Mlb cap as a vehicle to calculate the IBQs. Operationally, observers sampled halibut aboard trawlers, measuring length and assessing condition factors of released fish in order to calculate total discard mortality. Data were summarized at sea and the necessary bycatch mortality quota reduction was calculated at landing of the vessel's catch for each trip. If the vessel's IBQ was exceeded, the vessel was given a grace period to retire the outstanding mortality through purchase of IBQ on the open market. If this retirement could not be achieved with IBQ purchase, the vessel was prohibited from further fishing in those areas to which its IBQ applied.

This Area 2B IBQ program has been extremely successful. Bycatch mortality for the fishery dropped from 1.522 Mlb in 1995 to 0.307 Mlb in 1996. No vessel came within 50% of its IBQ during the year and almost all of the available groundfish target species quota was caught. Halibut bycatch mortality in this fishery has continued to be below the sum of the IBQs since the inception of the program and vessels have become even more efficient at catching the groundfish TACs. Prior to this program, groundfish trawl skippers had adamantly maintained that halibut bycatch mortality could not be reduced in that fishery. Contrary to this claim, the target reduction was achieved and exceeded through provision of an effective incentive and penalty regulatory framework. This framework allowed trawl skippers to use their own creativity to minimize bycatch while maximizing groundfish catch. The target of 50% reduction in halibut bycatch mortality was thought initially to be an extreme and unrealistic target, yet the fishery has easily exceeded this target reduction through changes in the behavior of how fishing is conducted.

In summary, we believe this successfully demonstrated approach is consistent with the Council's goals and with the intent of the IBQ program as outlined in the proposal.

2. **Continue the collection of halibut length and discard condition, and use observer data to determine mortality.** The proposal calls for discontinuing the recording of release condition, in spite of the Council's decision in November 2008 to use observer data as the best way to estimate mortality. This part of the proposal is a step backward, in our opinion. The Council's goal for the IBQ program is to reduce trawl bycatch mortality of halibut. Managers should be providing as many tools as possible for operators to achieve this goal, and improved handling will be reflected in the observer data on discard condition. Forgoing collection of condition information will remove any ability for the vessel to benefit from its own creative solutions to lowering discard mortality. Further, the use of a fixed discard mortality rate serves as a disincentive to institute handling procedures that would reduce discard mortality since there would be no benefit to a vessel to do so. In addition to condition information, we recommend continued collection of length information, to convert to weight via the Commission length-weight conversion formula. Obtaining weights at sea is

fraught with difficulty and error. A length-weight conversion procedure is how data on weight of discards of halibut is obtained in all other jurisdictions.

3. **Clarification of quota tracking in Alaskan IFQ fishery.** Finally we wish to clarify the statement provided in the final paragraph of the proposal, which incorrectly states that "*...quota for the North Pacific directed halibut IFQ fishery is also converted to round weight and tracked in a similar manner.*" In the Alaskan IFQ fishery, NMFS Restricted Access Management (RAM) tracks all halibut landings in net (dressed) weight, which is head off and eviscerated.

IPHC staff will be in attendance at the meeting and can answer any questions the Council may have on this issue.

Sincerely,

Bruce M. Leaman
Executive Director

cc: Commissioners