

WASHINGTON DEPARTMENT OF FISH AND WILDLIFE (WDFW) **REVISED**
REPORT ON PACIFIC HALIBUT INDIVIDUAL BYCATCH QUOTA (IBQ)

The Washington Department of Fish and Wildlife (WDFW) has identified the following objectives relative to applying an individual bycatch quota (IBQ) through the Trawl Rationalization Program and would like to offer them for Council consideration:

1. Account for total mortalities of all halibut bycatch in the trawl fishery
2. Prosecute a successful Trawl Rationalization Program that is not overly restricted by halibut bycatch limits
3. Hold individual harvesters accountable for halibut bycatch
4. Provide incentives to minimize halibut bycatch and halibut bycatch mortality

Given those objectives, we reviewed the Council's action taken in November 2008, which was:

Establish limit for legal-sized Pacific halibut bycatch mortality through the use of an IBQ in the trawl fishery up to 10% of the Area 2A Constant Exploitation Yield (CEY) as set by the International Pacific Halibut Commission (IPHC). This amount will be set initially at 10% and may be adjusted through the biennial specifications process.

Upon further reflection of this motion, WDFW has identified a couple of concerns with taking the approach adopted by the Council. Specifically, while the motion provides an incentive to avoid bycatch, it does not explicitly provide an incentive to reduce halibut bycatch mortality, and it does not address the mortality of sublegal bycatch.

In addition, the initial allocation of halibut bycatch could be too low at the outset to allow successful prosecution of Trawl Rationalization Program. For example, the Total CEY from the 2008 IPHC stock assessment was 640,000 lbs, which would produce a trawl bycatch quota of 64,000 lbs of legal-sized halibut bycatch mortality. Compared to an estimate of 127,677 lbs. of legal-sized halibut mortality in the trawl fishery in 2007, this would represent a 50% reduction from recent mortality levels concurrent with the first year of trawl rationalization implementation.

What we would view as a positive aspect of the motion adopted in November is that it uses a percentage of the trawl set aside that directly ties the trawl halibut bycatch mortality limit to halibut abundance. This is especially useful as the halibut abundance fluctuates and what it will be for the first year of trawl rationalization is unknown. So, for the purposes of initial allocation, it is our view that specifying a percentage of the CEY is a favorable approach.

However, having an allocation amount in pounds that changes from year-to-year results in unpredictability in the fishery and, absent an overall cap on the amount of halibut that may be set aside, could result in increased bycatch in years of higher abundance. Although we note that the 10% is currently represented as a cap and could be adjusted downward, especially in years of higher abundance so as not to increase halibut bycatch.

To address these concerns and achieve the objectives described above, WDFW would recommend the following alternative approach:

Apply a halibut bycatch reduction program in phases to provide sufficient time to establish a baseline of trawl halibut bycatch and for harvesters to explore methods (e.g., adjustments to time and/or area fished, gear modifications) to reduce halibut bycatch and bycatch mortality by revising the Council's action as follows:

Establish a limit for total Pacific halibut bycatch mortality (legal-sized and sublegal fish) through the use of an IBQ in the trawl fishery. The initial amount for the first two years of the trawl rationalization program would be calculated by taking 15% of the Area 2A Total Constant Exploitation Yield (CEY) as set by the International Pacific Halibut Commission (IPHC) for the previous year not to exceed 130,000 lbs per year for total mortality. For example, if the trawl rationalization program went into effect in 2013, the trawl halibut IBQ would be set at 15% of the Area 2A CEY adopted for 2012 or 130,000 lbs per year, whichever is less, for 2013 and 2014 (Years 1 and 2 of the program).

Note: 130,000 lbs represents an approximate reduction of 50% from the total bycatch estimate provided by the Northwest Fisheries Science Center for the most recent year (2007) as contained in Agenda Item E.1.b, Supplemental NMFS Report, September 2008.

Beginning with the third year of implementation, the maximum amount set aside for the trawl rationalization program would be reduced to 100,000 lbs per year for total mortality. This amount may be adjusted downward through the biennial specifications process for future years.

WDFW would recommend that the Council consider approving this recommendation as a preliminary approach for public review, with final action scheduled for the June 2009 Council meeting.