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INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

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June 11, 2009

Mr. Don Hansen, Chair
Pacific Fishery Management Council
7700 Ambassador Place, Suite 101
Portland, OR 97220

Dear Don:

The staff of the International Pacific Halibut Commission (IPHC) has read the letter of 26 May 2009 from Dr. Elizabeth Clarke to Mr. John DeVore regarding monitoring halibut bycatch mortality in the trawl IQ fishery. In the letter, Dr. Clarke states the National Marine Fisheries Service (NMFS) recommendation to continue with the current fleet-wide bycatch mortality rate, instead of tracking an individual vessel's bycatch mortality using real-time observer sampling. While we understand the substantial changes to observer sampling required by the IQ program, we believe the IQ plan provides a significant opportunity to reduce halibut bycatch to the benefit of both the halibut resource and the industry's ability to land groundfish.

The halibut IBQ program is an opportunity to implement incentives to reduce halibut bycatch mortality. Individual vessel quotas for halibut bycatch will allow each vessel operator to fish more efficiently and effectively for a given amount of groundfish. Incentives for improved handling and discard practices are created by monitoring the halibut mortality on each vessel. Continued use of fleet-wide mortality estimates will dissipate the benefits achieved through bycatch reduction by some operators when other operators do not undertake similar improvements. Vessel operators need to have individual bycatch accountability in order to realize increased groundfish fishing opportunities as a result of their own actions.

We also disagree with the implication that the dichotomous key is a negative factor to individual monitoring. As background, the key was developed in 2000 by IPHC staff to minimize the subjectivity that had previously existed in the release viability determinations by observers. It is the standard method used for bycatch mortality estimation and is successfully used by observers off Alaska, including vessels fishing with industry cooperatives. It will be used by observers whether a fleet-wide or individual vessel mortality monitoring plan is adopted for the west coast trawl IQ fishery.

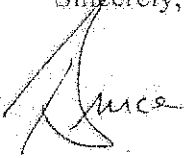
The Canadian trawl fishery has successfully operated with a Groundfish IFQ and halibut IBQ program since 1995. Halibut mortality is monitored on each individual vessel. Observers do not

use the key but employ the same condition criteria developed by IPHC which forms the basis for the dichotomous key. Even without the key, observer sampling of halibut bycatch proceeds quickly when proper incentives are available to harvesters. For example, in 2007, 80% of the fish (n = 20,712) were sampled within 15 minutes of being dumped on deck.

NMFS/NWFSC may be reasonably concerned about an increase in the observer workload required for catch estimation and a subsequent inability to conduct individual vessel monitoring. If so, we recommend that the Council identify its priorities for observer sampling and request from NMFS/NWFSC and the West Coast Groundfish Observer Program an estimate of the resources that would be required to conduct individual vessel halibut mortality monitoring. Such resources are integral to successful implementation of the Individual Quota program and the maximizing of industry support, and should be a priority for Council action with participating agencies.

Gregg Williams of the Commission staff will be attending the Council meeting and can address any questions you may have.

Sincerely,



Bruce M. Leaman
Executive Director

cc: Commissioners