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## INTERNATIONAL PACIFIC HALIBUT COMMISSION

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EL2017084 26 October 2017

Agenda Item F.11.a Supplemental IPHC Report 1 November 2017

Mr. Charles A. Tracy Executive Director, Pacific Fishery Management Council 7700 NE Ambassador Place, Suite 101 Portland, OR 97220-1384

## Re: Pacific Halibut Discard Mortality Rates for Bottom Trawls using Electronic Monitoring

Dear Mr. Tracy:

The International Pacific Halibut Commission (IPHC) wishes to comment on Agenda Item F.11 scheduled for the Pacific Fishery Management Council's (PFMC) November 2017 meeting: Electronic Monitoring – Final Pacific Halibut Discard Mortality Rates, Discard Species Lists, and Third-Party Review.

The IPHC appreciates the ongoing consultation among the West Coast Groundfish Observer Program (Observer Program) of the NOAA National Marine Fisheries Service (NMFS) Northwest Fisheries Science Center, the PFMC Groundfish Management Team (GMT), and the PFMC Groundfish Electronic Monitoring Policy Advisory and Technical Advisory Committees (GEMPAC/GEMTAC) to ensure that rates are consistent for effective management of Pacific halibut. The IPHC supports DMR estimates that are scientifically based and which have been reviewed and accepted by the PFMC Scientific and Statistical Committee (SSC). Specifically, we believe the approach described in the preliminary preferred alternative has the following advantages:

- a) It is supported by empirical data.
- b) It is a better estimate than the 90% value currently used.
- c) It is relatively simple to understand and practical to use with electronic monitoring.
- d) It incentivizes good practice (noting that it also requires good fish-handling techniques).

At our 92<sup>nd</sup> and 93<sup>rd</sup> Annual Meetings (2016 and 2017), the IPHC recommended that standards be established to ensure that fishers continue to practice safe handling techniques while minimizing time on deck (see <u>AM093 Recommendation 10</u>). Best handling practices should include avoiding handling fish by the gills as well as avoiding returning fish to the water by the tail (potentially disarticulating the spine), instead supporting the fish with one hand under the body while releasing it head-first into the sea. These handling practices can be monitored from Electronic Monitoring (EM) footage, but do not necessarily need a threshold value established unless data or trends indicate a need. We also suggest that development of an appropriate DMR for EM-monitored trawl trips should be an iterative process, and encourage further data collection and checking results of the proposed method against existing data. Fish handling practices, as well as other factors that are easily measured by EM systems or catch accounting logs, such as tow depth, tow duration, temperature differences, and gear configuration, should continue to be investigated as possible ways to further refine the algorithm outlined in the preferred alternative.



We appreciate the comparison of the mortality rates resulting from the proposed EM-DMR methodology to the observed rates in 2016 (under "Request 1" of the SSC on page 5 of Agenda Item F.11, GMT Report 1, Nov 2017) for in-season bycatch management. The IPHC is working with the Observer Program to better understand the magnitude of these changes.

Lastly, we note the discussion (under "Request 4," follow-on action, on page 7 of Agenda Item F.11, GMT Report 1, Nov 2017) pertaining to review of less than 100% of the EM imagery. The IPHC's concern is that review rates less than 100% will necessitate an analysis to identify levels of review that ensure logbook compliance as well as the effect of subsampling on the precision and accuracy of time-on-deck estimates.

The IPHC thanks the PFMC, Observer Program, GMT, and GEMPAC/GEMTAC for their ongoing collaboration on Pacific halibut bycatch management efforts.

Sincerely,

all-

David T. Wilson, Ph.D. Executive Director, IPHC

cc: IPHC Commissioners Patrick Mirick, ODFW, GMT EM lead Brett Wiedoff, PFMC Kelly Ames, PFMC