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## INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

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EL2018048  
15 May 2018

Mr. Philip Anderson  
Chairperson, Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220-1384

### **Re: Non-treaty directed commercial Pacific halibut fishery in IPHC Regulatory Area 2A**

Dear Mr. Anderson:

The International Pacific Halibut Commission (IPHC) notes with appreciation the extended discussion during 2017 by the PFMC and its advisory bodies in response to the IPHC's letter of 30 May 2017 recommending consideration of options for changes to the management of the non-treaty directed commercial Pacific halibut fishery in IPHC Regulatory Area 2A.

The IPHC sees no compelling reason to retain this fishery's current 'derby-style' management structure, and a number of substantial advantages in shifting to a management system that reduces the concentration of fishing effort and eliminates or reduces the race to fish, including the safety of fishery participants.

It is the intention of the IPHC to eliminate the 'derby-style' management structure in the near term. We acknowledge that the change from a 'derby-style' fishery to either a limited-entry or quota fishery would require active engagement on the part of the PFMC and NOAA Fisheries. Thus, we request to continue discussion toward that goal during 2018.

As an interim measure, the IPHC will commence internal discussions to extend the length of the current fishery for the 2019 fishing period, as we continue discuss the end of the 'derby-style' management of the fishery in the near future. We expect that a proposal to change the length of the fishing period for the non-treaty directed commercial Pacific halibut fishery in IPHC Regulatory Area 2A will be presented to the IPHC for consideration during its 2018-19 meeting cycle, for potential implementation in 2019.

Noting that Pacific halibut is not on the agenda for the June 2018 PFMC meeting, we wish to call the Council's attention to this issue at this time, and would appreciate the PFMC's consideration of this potential change in the course of its regular review of the Pacific halibut fishery and its Catch Sharing Plan later this year. The IPHC will provide briefing book materials in advance of the September and October PFMC meetings and IPHC Secretariat staff will attend both meetings. Recommendations from the Council would then be considered by the IPHC at its Interim Meeting in November 2018 and Annual Meeting in January 2019.

The IPHC appreciates the PFMC's consideration of this question, and looks forward to working with the Council and Council staff to continue our strong partnership for sustainable management of the Pacific halibut resource.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Wilson', with a long horizontal flourish extending to the right.

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

cc: IPHC Commissioners  
Chuck Tracy, PFMC  
Mike Burner, PFMC  
Robin Ehlke, PFMC