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## INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

EXECUTIVE DIRECTOR  
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EL2018055  
6 August 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 since 2017 by the PFMC and its subsidiary 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.

As part of this discussion, the [Non-Indian Directed Pacific Halibut Fishery Management- Scoping Exercise](#) discussed at the November 2017 PFMC meeting identified a matrix of levels of engagement and task sharing in management of the fishery, ranging from Level 1 (status quo) to Level 3 (shift in roles and responsibilities).

Level 2 of the matrix (moderate change) included a number of options as transitional tools. Among the structural changes considered in Level 2 was a change in the length of the fishing period, which is the mandate of the IPHC.

In our [letter of 15 May 2018](#), the IPHC noted its expectation 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 considered by the IPHC during its 2018-19 meeting cycle, for potential implementation in 2019. We expect this proposal to include options for either a 5-day or 10-day fishing period each year, with the possibility of additional fishing periods depending on landings.

We 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 during its September and November meetings this year. The IPHC will provide briefing book materials for both meetings and IPHC Secretariat staff will attend. Recommendations from the PFMC would then be considered by the IPHC as it reviews the proposal at its 94<sup>th</sup> Interim Meeting (IM094) in November 2018 and 95<sup>th</sup> Annual Meeting (AM095) in January 2019.

As noted previously, 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

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fishery participants. We acknowledge that further change beyond that which is contemplated for 2019, such as shifting to either a limited-entry or quota-share fishery, requires active engagement on the part of the PFMC and NOAA-Fisheries. Thus, we request to continue discussion toward that goal during 2018 and 2019.

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

Sincerely,



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

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