PAST REPORTS FROM THE INTERNATIONAL PACIFIC HALIBUT COMMISSON REGARDING THE AREA 2A NON-TREATY COMMERCIAL DIRECTED PACIFIC HALIBUT FISHERY

The following is an International Pacific Halibut Commission (IPHC) report (IPHC-2018-AM094-INFO2) outlining potential changes to the structure of the non-treaty directed commercial halibut fishery in Area 2A. The report was provided to IPHC at their January, 2018 IPHC annual meeting and focused on a three to five-day fishery structure.

Appendix II of the attached includes the IPHC report to the Council (G.1.a. IPHC Report 1, September 2017), which focused on fishing periods ranging from one week to one month.

IPHC Regulatory Area 2A Directed commercial Pacific halibut fishery *management overview and fishing period options (2- and 5-days)*

PREPARED BY: IPHC SECRETARIAT (19 DECEMBER 2017)

PURPOSE

To provide a description of the IPHC Regulatory Area 2A Pacific halibut directed commercial fishery management, and an update of fishing period options in response to the Commission recommendation at the 2017 Interim Meeting (IM093-Rec.01).

BACKGROUND

The directed commercial Pacific halibut fishery in IPHC Regulatory Area 2A is one of the last commercial derby fisheries in the United States of America, operating as a series of potential 10-hr openings on pre-selected dates dependent on quota (catch limit) remaining in the fishery allocation. While commercial Pacific halibut fisheries in Alaska and British Columbia have moved to various types of individual fishing quota (IFQ) management by national governments over the years, the IPHC Regulatory Area 2A commercial fisheries have not. The derby-style directed commercial fishery in IPHC Regulatory Area 2A is managed by the IPHC setting fishing period dates, setting fishing period limits in-season by vessel size class, licensing vessels for participation in the fishery, and adopting overall Regulatory Area 2A catch limits in accordance with the Pacific Fishery Management Council's (PFMC's) Pacific halibut Catch Sharing Plan (CSP).

In June 2017, the IPHC Secretariat notified the PFMC via letter that the IPHC Secretariat sees no compelling reason to maintain a commercial derby fishery and several reasons to move away from it, including increased safety-at-sea, reduced wastage, and increased flexibility for fishers and processors (Appendix I). The PFMC, after considering input from its stakeholder advisory body, informally asked the IPHC Secretariat to provide information on potential vessel fishing period limits for longer fishing periods. The IPHC Secretariat provided that information at the PFMC's September 2017 meeting (Appendix II). At the PFMC's November 2017 meeting, the PFMC considered management options for this fishery but decided not to take further action on this issue at this time given other priorities. At the IPHC's Interim Meeting in November 2017, the Commissioners recommended the following:

IM093–Rec.01	***Report of the IPHC Secretariat (2017)*** The Commission **RECOMMENDED** that the IPHC Secretariat develop a working paper for consideration at the 94th Annual Meeting, containing the following: a) A detailed description of how the Regulatory Area 2A commercial fishery (derby) is managed, including roles and responsibilities of agencies, the PFMC and the IPHC; and b) An update to the analysis of various fishing periods and fishing period limits provided to the PFMC in September 2017, including the addition of 2- and 5-day fishing periods.

REGULATORY AREA 2A DIRECTED COMMERCIAL MANAGEMENT, INCLUDING ROLES & RESPONSIBILITIES

There are four commercial Pacific halibut fisheries in IPHC Regulatory Area 2A:

1) a directed commercial fishery south of Pt Chehalis, WA (46°53.30′ N. lat.);
2) an incidental Pacific halibut fishery to the sablefish fishery north of Pt. Chehalis;
3) an incidental fishery to the salmon troll fishery; and
4) a tribal commercial fishery (for the 13 treaty Indian tribes within a defined geographic location (IPHC Regulatory Subarea 2A-1)).

The PFMC's CSP allocates the IPHC-adopted Regulatory Area 2A catch limit among commercial fisheries and other sectors in IPHC Regulatory Area 2A.

For the directed commercial fishery, the IPHC has primary management responsibility for this derby-style fishery. The specific roles and responsibilities for management during a season are as follows:

Pre-season

- PFMC: considers and adopts changes to the CSP which dictates allocation of the catch limit among sectors (Sep., Nov. of the previous year)
- IPHC: adopts the following limits and management measures for the IPHC Regulatory Area 2A Pacific halibut fishery:
    - o catch limits, including endorsement of the PFMC's CSP and the resulting sector allocations. (Jan)
    - o fishing periods, including a series of potential dates for the directed commercial fishery and specification that it will operate from 0800 hours to 1800 hours local time on those days (IPHC Regulation Section 8 (2)) (range of potential dates in Jan, closure announced when allocation of limit estimated to be attained).
    - o fishing period limits, including limits by vessel size class as specified in IPHC Fishery Regulations (2017) Section 11 (1,2,3,6,7) and 12.
    - o license procedures, to issue licenses to vessels as specified at IPHC Regulation Section 4 (no fee, no limit on the number of licenses issued, applications due no later than 2359 on 30 April, or on the first weekday in May if 30 April is a Saturday or Sunday) (Apr/May)
- NMFS: implements the resulting catch limits and management measures in US regulations (Feb/Mar)

Inseason

- IPHC: sets the fishing period limits by vessel size class for the first 10-hr opener based on the sector catch limit and the number of licenses issued by vessel size class. IPHC announces via news release and coordinates with NMFS and State Agencies.
- NMFS: deploys observers using similar coverage rates and approach as is used with the limited entry fixed gear groundfish fleet (first covered in 2017).
- IPHC: gathers biological samples from fishery landings in key ports.
- IPHC: reviews fish ticket information immediately following the opener to estimate if enough of the sector catch limit remains for another opener.
- IPHC, NMFS, Pacific State Marine Fisheries Commission (PSMFC), and the State Fish and Wildlife Agencies (Washington, Oregon, California): coordinate on data.

- If enough sector catch limit remains, the process starts over again with IPHC setting fishing period limits by vessel size class. If not, the fishery closes.

Post-season

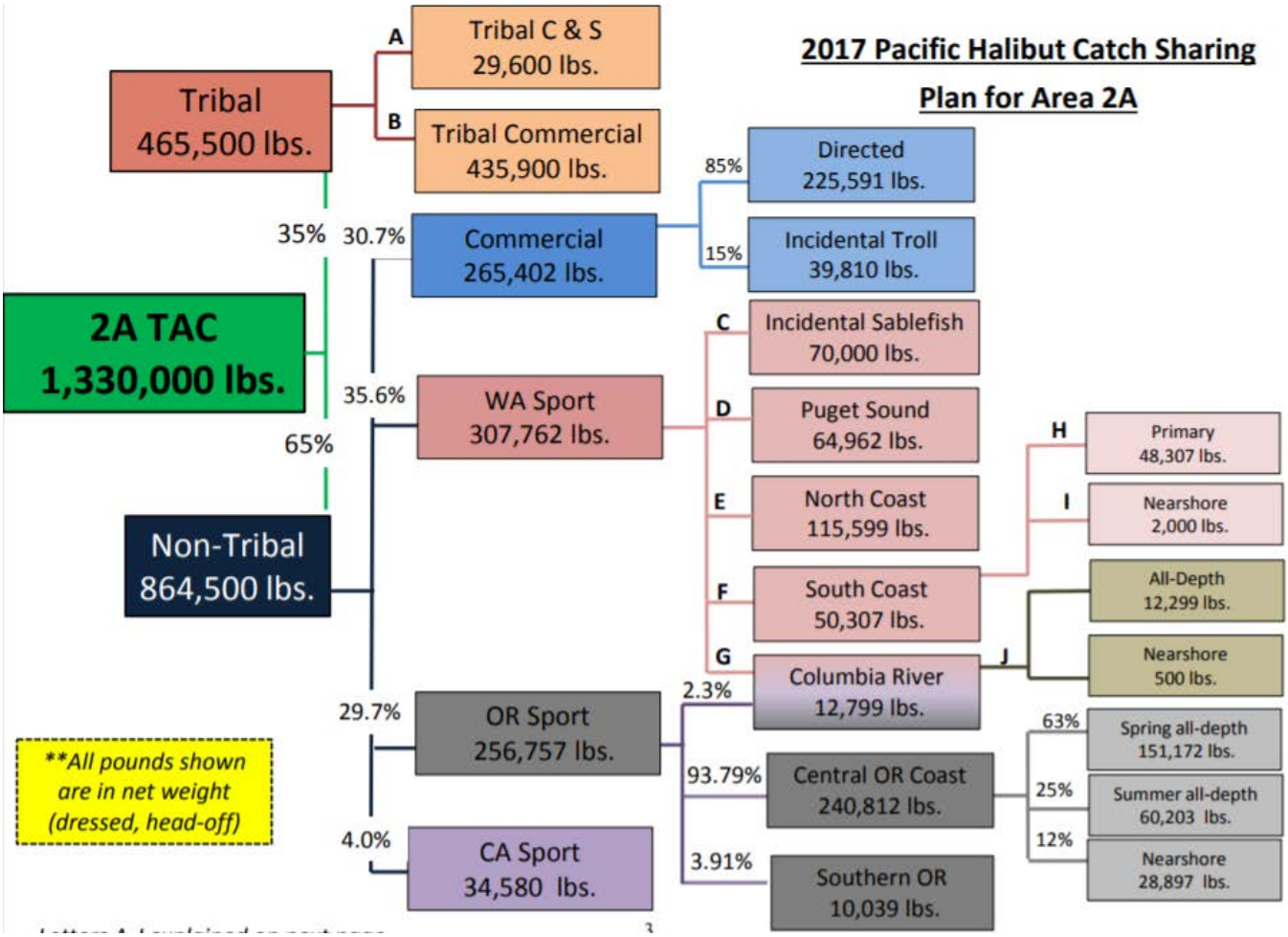
- IPHC, NMFS, PSMFC, and the State Fish and Wildlife Agencies (Washington, Oregon, California): coordinate on data and reporting from the fishery.

At the PFMC's November 2017 meeting under the Pacific halibut agenda item, the PFMC provided a document with a similar exercise of roles and responsibilities under status quo management of the directed commercial fishery as a derby-style fishery (Level 1); as well as how roles and responsibilities would shift under a longer season or an incidental fishery (Level 2), or under limited entry or an IFQ fishery (Level 3) (Agenda Item E.1, Attachment 3, Nov 2017). The table on page 3 of Agenda Item E.1, Attachment 3, summarizes roles and responsibilities under different management scenarios.

Table 1. Scoping Matrix - Management Scenarios for the Non-Indian Directed Commercial Pacific Halibut Fishery

Level	Description	Work Load	Time Demand/ Time Frame	Comment
Level 1 Status Quo	**IPHC** lead in fishery management.	**IPHC**: establishes TAC; issues vessel licenses, identifies vessel classes, vessel limits, fishing periods, conducts biological sampling, data collection & compilation, develops fishery regulations for implementation by **NMFS**. **Council** facilitates preseason public process of developing Area 2A Catch Sharing Plan (CSP) and recommending annual regulations for the upcoming year. **NMFS** implements CSP/ updates regulations compliant with all applicable laws. Coordinates observer coverage with West Coast Groundfish Observer program. **States** monitor fisheries and report landings.	Status Quo **Council** moderate time demand preseason. **IPHC** high time demand throughout. **States** high time demand inseason. **NMFS** moderate time demand preseason and inseason.	Status Quo. Standard Council schedule for Halibut is Sept. and Nov., and sometimes June. Season setting process consistent with Council Operating Procedure (COP). 9
Level 2 Moderate change from Status Quo. (Greater change if include the standard workload for **Council** and **States** involvement, and **NMFS** regulatory process used in incidental retention fisheries).	**Council** to provide greater guidance and recommendations to **IPHC** if no change fishery structure. General framework of CSP intact, with level of revision dependent on level of fishery change. More variability in change at this level.	If changes are moderate: **IPHC:** no change in Status Quo. **Council** works with **NMFS** to develop vessel classes, vessel limits and fishing periods preseason and inseason for recommendation to **IPHC**. **States:** no change in Status Quo, unless want more involvement in developing annual fishery structure, or take over biological sampling. If current fishery structure to change from direct to incidental, **NMFS** take lead for regulations and inseason management, entities follow established pattern of tasks as in other incidental halibut fisheries.	**IPHC** time: No change if fishery structure is status quo. **States** time: no change or slight increase. **Council** time: increase. **NMFS** time increase. TIMEFRAME- *gradual transition potentially over two or three year period.*	Change anticipated in **Council** process and entity workload, but would depend on level of change in current fishery structure. May require change in management schedule (COP 9). Moderate development and implementation costs, and modest to moderate ongoing maintenance costs.
Level 3 Major Change from Status Quo. (Equivalent to FMP amendment to develop programs in terms of workload /process).	**Council** takes lead in fishery management: CSP modified to include detailed framework for fishery and role/responsibilities. Forward plans to **IPHC** for approval.	**NMFS** issues licenses. **Council, NMFS** develop preseason plan for fishery season structure. **NMFS** implements fishery, inseason management. **States** monitor fisheries and report landings, potentially including biological sampling.	**IPHC** time: decrease. **States** time: increase; outreach to develop recommendations. **Council** time: increase. **NMFS** time: increase. TIMEFRAME- *transition potentially over 3-5 year period, perhaps graduating from Level 2.*	Substantial changes for all entities. May require a change in COP 9 **Council** could consider a Halibut Management team or Technical Committee, or increase GAP/GMT membership to account for additional workload. High implementation and on-going maintenance costs.

A diagram of the Regulatory Area 2A CSP for 2017 from a September PFMC meeting document is excerpted below (PFMC, Agenda Item G.1, Attachment 2, Sept 2017)



ADDITIONAL ANALYSIS OF FISHING PERIODS OPTIONS FOR 2- AND 5-DAYS

In September 2017, the IPHC Secretariat provided the PFMC information at their request on how fishing period limits by vessel size class might change with longer fishing periods (Appendix II). The PFMC requested a range of fishing period options to be analyzed from the 10-hr derby (status quo), to a one week, 20-day, or 30-day fishing period. Following the IPHC Interim Meeting in November 2017, the Commissioners requested that the IPHC Secretariat provide additional options of a 2- and 5-day fishing period.

The IPHC's response to the PFMC request, in Appendix II, provides details on licensing the IPHC Regulatory Area 2A fishery, including the number of licenses issued and fished between 2012 – 2017 (Appendix II, Table 1). It also describes the dates of the fishery (Table 2), as well as fishing period limits by vessel size class and estimated landings in recent years (Table 3). The IPHC issues commercial Pacific halibut licenses by the vessel's size (or length) class, which ranges from A to H, with A being the smallest vessels (25 ft and under) and H being the largest (56 ft and over). The heart of the analysis is in Table 4 which provides sample fishing period limits by vessel size class and estimates of landings under each. The table is based on the 2017 directed commercial fishery allocation and the number of licenses IPHC issued for the fishery in 2017. Note that vessels can choose to be licensed in the directed commercial fishery, or in both the directed commercial and the fishery incidental to sablefish. At the bottom of Table 4 in Appendix II, it shows the estimated landings under three scenarios: (1) if all vessels licensed participated and caught their full vessel limit, (2) if only half the licensed vessels participated and

landed their full vessel limit, and (3) if only half the licensed vessels participated and only landed half of their vessel limit (this has been the case, generally speaking, under the 10-hr derby). Table 4 from Appendix II has been updated to include estimated fishing period limits under the 2- and 5-day options and is published in this paper as Table 2.

In Appendix II, the 1-week fishery (PFMC Option 1) was expected to have vessel limits for H-class vessels (the largest size class (56+ feet) and used as the reference point when talking about vessel limits) set between 4,000 to 6,000 pounds (1.81 to 2.72 t) (net weight) for the first opening. This was based on using the 2017 allocation of 225,591 pounds (102.33 t) (net weight) and on the number of vessels licensed by size class in 2017. For the 20-day fishery (PFMC Option 2), the IPHC would likely choose fishing period limits based on an H-class limit of 2,000 to 4,000 pounds (0.91 to 1.81 t) (net weight) for the first 20-day fishing period. With a 20-day fishery, as opposed to a 1-week fishery, IPHC would have to be more conservative in setting the vessel limit because with more time to fish, more vessels would likely participate and would more likely catch their vessel limit. For the 30-day fishery (PFMC Option 3), the IPHC would likely choose fishing period limits based on an H-class limit of 2,000 pounds (0.91 t) (net weight) for the first 30-day fishing period. With a 30-day fishery, as opposed to a 1-week or 20-day fishery, IPHC would have to be more conservative in setting the vessel limit because with more time to fish, more vessels would likely participate and would more likely catch their vessel limit.

In summary, based on the 2017 allocation of 225,591 pounds (102.33 t) (net weight) and on the number of vessels licensed by size class, the fishing period limit for H-class vessels in pounds (net weight) of Pacific halibut are estimated to be as follows under a 1-week, 20-day, and 30-day directed commercial fishery with a full breakout by vessel size class in Table 2:

- o 1-week 4,000 to 6,000 lbs (1.81 to 2.72 t)
- o 20-day 2,000 to 4,000 lbs (0.91 to 1.81 t)
- o 30-day 2,000 lbs (0.91 t)

Table 2. Estimated 1-week, 20-day, and 30-day fishing period limits by vessel size class for IPHC Regulatory Area 2A using 2017 allocation and number of licenses.

		1-week				20-day				30-day	
Vessel Size Class		***Vessel Limit (net wt)***									
feet	letter	pounds	metric ton	pounds	metric ton	pounds	metric ton	pounds	metric ton	pounds	metric ton
1-25	A	**335**	0.15	**505**	0.23	**200**	0.09	**335**	0.23	**200**	0.09
26-30	B	**420**	0.19	**630**	0.29	**210**	0.10	**420**	0.29	**210**	0.10
31-35	C	**670**	0.30	**1,010**	0.46	**335**	0.15	**670**	0.46	**335**	0.15
36-40	D	**1,850**	0.84	**2,780**	1.26	**925**	0.42	**1,850**	1.26	**925**	0.42
41-45	E	**1,990**	0.90	**2,990**	1.36	**995**	0.45	**1,990**	1.36	**995**	0.45
46-50	F	**2,385**	1.08	**3,575**	1.62	**1,190**	0.54	**2,385**	1.62	**1,190**	0.54
51-55	G	**2,660**	1.21	**3,990**	1.81	**1,330**	0.60	**2,660**	1.81	**1,330**	0.60
56+	H	**4,000**	1.81	**6,000**	2.72	**2,000**	0.91	**4,000**	2.72	**2,000**	0.91

For a 2- or 5-day fishery, and keeping all other parameters the same (i.e., using 2017 allocation and number of vessels licensed by size class), the fishing period limit for H-class vessels in pounds (net weight) of Pacific halibut are estimated to be as follows with a full breakout by vessel size class in Table 3:

- o 2-day 9,000 lbs (4.08 t)
- o 5-day ~6,000 lbs (2.72 t)

Table 3. Estimated 2-day and 5-day fishing period limits by vessel size class for IPHC Regulatory Area 2A using 2017 allocation and number of licenses.

		2-day		5-day	
Vessel Size Class		***Vessel Limit (net wt)***			
feet	letter	pounds	metric ton	pounds	metric ton
1-25	A	**755**	0.34	**505**	0.23
26-30	B	**945**	0.43	**630**	0.29
31-35	C	**1,510**	0.68	**1,010**	0.46
36-40	D	**4,165**	1.89	**2,780**	1.26
41-45	E	**4,480**	2.03	**2,990**	1.36
46-50	F	**5,365**	2.43	**3,575**	1.62
51-55	G	**5,985**	2.71	**3,990**	1.81
56+	H	**9,000**	4.08	**6,000**	2.72

With a 2-day opener of the directed commercial fishery, the IPHC Secretariat would likely choose fishing period limits based on an H-class limit of 9,000 pounds (4.08 t) (net weight), the same amount generally used for the first 10-hr derby. Given that the 10-hr derby has been open for multiple days (2-3 total days) in recent years, a 2-day opener (i.e., 48-hrs) could be expected to have similar to, but slightly increased landings from recent 10-hr derby openers. Similar to the 10-hr derby, not all licensed vessels would be expected to participate in a 2-day opener. However, they could be expected to catch more of their vessel limit than under a 10-hr derby. With the 2-day opener, the IPHC would expect to have only one opener based on an H-class limit of 9,000 pounds (4.08 t) (net weight).

With a 5-day opener, the IPHC Secretariat would likely choose fishing period limits based on an H-class limit of approximately 6,000 pounds (2.72 t) (net weight). The 5-day opener is just slightly shorter than the 1-week fishery (PFMC Option 1) and would therefore be expected to have H-class limits on the higher end of the 1-week option range given that there is less time for all licensed vessels to participate.

Detailed breakouts for each vessel size category under all of these options are provided in Table 4 below. Note that these limits are based on the 2017 allocation and number of licenses issued by size class, both of which will change for 2018. The IPHC Secretariat will set fishing period limits for 2018 before the start of the first opener based on the actual number of licenses issued in 2018 and on the 2018 directed commercial fishery allocation.

Table 4. Estimated fishing period limits by vessel size class and estimated landings (lb, net weight) for IPHC Regulatory Area 2A using 2017 allocation and number of licenses.

				(2-day)		(5-day)		PFMC Option 2 (20-day)			
2017 allocation (lb, net weight)			225,591	Status quo (10-hr derby)		PFMC Option 1 (1-week)				PFMC Option 3 (30-day)	
Vessel Class		***vessel limit ratio***	***2017 # Lic***	***9,000 vessel limit***		***6,000 vessel limit***		***4,000 vessel limit***		***2,000 vessel limit***	
feet	letter			vessel limit	est. landings	vessel limit	est. landings	vessel limit	est. landings	vessel limit	est. landings
1-25	A	0.084	15	**755**	11,325	**505**	7,575	**335**	5,025	**200**	3,000
26-30	B	0.105	11	**945**	10,395	**630**	6,930	**420**	4,620	**210**	2,310
31-35	C	0.168	19	**1,510**	28,690	**1,010**	19,190	**670**	12,730	**335**	6,365
36-40	D	0.463	39	**4,165**	162,435	**2,780**	108,420	**1,850**	72,150	**925**	36,075
41-45	E	0.498	43	**4,480**	192,640	**2,990**	128,570	**1,990**	85,570	**995**	42,785
46-50	F	0.596	36	**5,365**	193,140	**3,575**	128,700	**2,385**	85,860	**1,190**	42,840
51-55	G	0.665	14	**5,985**	83,790	**3,990**	55,860	**2,660**	37,240	**1,330**	18,620
56+	H	1	31	**9,000**	279,000	**6,000**	186,000	**4,000**	124,000	**2,000**	62,000
			208								
If 100% of licenses participate & land 100% of vessel limit					961,415		641,245		427,195		213,995
If 50% of licenses participate & land 100% of vessel limit					480,708		320,623		213,598		106,998
If 50% of licenses participate & land 50% of vessel limit					240,354		160,311		106,799		53,499

RECOMMENDATION/S

That the Commission:

1) **NOTE** paper IPHC-2018-AM094-INF02 which provides a description of the IPHC Regulatory Area 2A Pacific halibut directed commercial fishery management, and an update of fishing period options in response to the Commission recommendation at the 2017 Interim Meeting (IM093-Rec.01).

APPENDICES

Appendix I: Letter to PFMC (Jun 2017)

Appendix II: IPHC Fishing Period Analysis for PFMC (Sept. 2017)

REFERENCES

PFMC 2017. Pacific Halibut Catch Sharing Plan for Area 2A

http://www.pcouncil.org/wp-content/uploads/2017/02/Final_2017_PACIFIC_HALIBUT_CATCH_SHARING_PLAN_FOR_AREA_2A.pdf

PFMC 2017. Visual Representation of the 2017 Area 2A Catch Sharing Plan for Pacific Halibut. Agenda Item G.1, Attachment 2, Sep 2017.

http://www.pcouncil.org/wp-content/uploads/2017/08/G1_Att2_CSP_Visual_SEPT2017BB.pdf

PFMC 2017. Non-Indian Directed Pacific Halibut Fishery Management - Scoping Exercise. Agenda Item E.1, Attachment 3, Nov 2017.

http://www.pcouncil.org/wp-content/uploads/2017/10/E1_Att3_Scoping-Matrix_NOV2017BB.pdf

Appendix I: Letter to PFMC (Jun 2017)

INTERNATIONAL PACIFIC HALIBUT COMMISSION

ESTABLISHED BY A CONVENTION BETWEEN CANADA

AND THE UNITED STATES OF AMERICA

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EL2017066
30 May 2017

Mr. Herb Pollard
Chair, Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

Re: Commercial derby fishery in IPHC Regulatory Area 2A

Dear Mr. Pollard:

The International Pacific Halibut Commission (IPHC) notes that the Pacific Fishery Management Council (Council) is reviewing the Pacific halibut Catch Sharing Plan (CSP) for Regulatory Area 2A during the remainder of this year.

In conjunction with reviewing the CSP, the IPHC recommends for the Council's consideration a change in the management of the non-tribal, directed commercial Pacific halibut fishery in Regulatory Area 2A. This fishery is one of the few remaining derby-style commercial fisheries in the United States of America, concentrating effort into as few as two days of fishing each year at current stock levels.

The IPHC sees no compelling reason to retain the directed commercial Pacific halibut fishery as a derby-style fishery, but a number of advantages in shifting to a management system that reduces the concentration of fishing effort and eliminates or reduces the race to fish. Potential advantages include:

1. Safety. The current derby system offers no flexibility as to when fishing takes place, creating pressure to attempt fishing even in poor weather and dangerous conditions. The U.S. Coast Guard has frequently commented at IPHC meetings in support of moving away from the derby fishery for this reason, and the Coast Guard provided similar input at the Council's March 2017 meeting. We believe that a system offering more flexible fishing opportunities is inherently safer for everyone on the water, and that this is the primary reason for change.

2. Reduced wastage. The current derby system is essentially a race for fish, where fishers have an incentive to set as much gear as possible during the short time available for fishing. When the fishing is good, this leads to more regulatory discards as trip limits are reached than would be the case under a system where the fishers had time to more carefully calibrate their effort to applicable limits. Mortality from these regulatory discards (termed 'wastage' in IPHC management) represents an unnecessary loss to the resource.

3. Flexibility for fishers and processors. Under the current derby system, fresh Pacific halibut from Regulatory Area 2A is delivered and comes to market in a tightly defined period of time, limiting the ability of fishers and processors to influence or react to market forces. A management system with more flexibility regarding fishing days would allow fishers and processors more latitude in managing their industry sector.

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Other than maintaining access to the resource by the commercial Pacific halibut fishery, the IPHC does not recommend a particular management system to replace the derby for the 2A non-tribal, directed commercial Pacific halibut fishery. The IPHC supports a reduction in the concentration of fishing effort, and eliminating the race to fish, as a guiding principle for any changes that are made.

We recognize the challenges that shifting to a new management system would entail in order to ensure equitable use and effective management of the resource, and that it would take some time to develop and implement changes. In addition to the Council, action would be required by IPHC, the U.S. National Marine Fisheries Service, and the various State agencies. For our part, IPHC stands ready to engage in the process and to support it with scientific advice.

The IPHC looks forward to working with the Council and Council staff to continue our strong partnership for sustainable management of the Pacific halibut resource.

Sincerely,

Dr. David T. Wilson
Executive Director, IPHC

cc: IPHC Commissioners
Charles Tracy, PFMC
Michael Burner, PFMC
Kelly Ames, PFMC

Appendix II: IPHC Analysis for PFMC (Sep 2017)

INTERNATIONAL PACIFIC HALIBUT COMMISSION

Agenda Item G.1.a
IPHC Report 1
September 2017

IPHC Report September 2017

IPHC Regulatory Area 2A Directed Commercial Pacific Halibut Fishery
Sample Vessel Fishing Period Limit Options for Longer Fishing Periods

Purpose

This paper provides input from the International Pacific Halibut Commission (IPHC) for the discussion of Pacific halibut fishery management in IPHC Regulatory Area 2A. Specifically, the Pacific Fishery Management Council (PFMC) requested information on how vessel fishing period limits might change with longer fishing periods for Pacific halibut.

Background

The IPHC submitted a letter to the PFMC recommending a move away from derby-style management for the directed commercial Pacific halibut fishery in IPHC's Regulatory Area 2A (Agenda Item G.1.a, Supplemental IPHC Letter 2, June 2017). The IPHC noted concerns over safety and discards, as well as limitations on fishers and processor flexibility. At the PFMC's June 2017 meeting, the PFMC reviewed the IPHC's letter and heard further input from the PFMC's Groundfish Advisory Subpanel (GAP) regarding possible alternatives to the commercial derby fishery (Agenda Item G.1.b, Supplemental GAP Report, June 2017). In response, the PFMC informally asked the IPHC to provide examples of vessel fishing period limits for longer fishing periods.

Current Management of the Directed Commercial Fishery

In the management of the Pacific halibut fishery, the IPHC sets the overall catch limit for IPHC Regulatory Area 2A and then endorses the PFMC's Pacific Halibut Catch Sharing Plan, which further allocates the IPHC Regulatory Area 2A catch limit among user groups, including the directed commercial fishery (Agenda Item G.1, Attachment 1, June 2017). The National Marine Fisheries Service (NMFS) then implements the resulting catch limits by user groups in domestic regulations, which may be more restrictive than IPHC regulations. All agencies work closely together to facilitate each step of the annual process.

For the non-Indian directed commercial Pacific halibut fishery in IPHC Regulatory Area 2A, the IPHC is responsible for issuing licenses and setting the fishing periods and individual vessel fishing period limits. The IPHC sets the directed commercial fishery fishing periods and fishing period limits to match the Catch Sharing Plan allocation for this sector.

Licenses

The IPHC issues licenses to participate in Pacific halibut fisheries in IPHC Regulatory Area 2A, as specified in IPHC Regulation Section 4 (Licensing Vessels for Area 2A), including:

- the directed commercial fishery,
- retention of Pacific halibut incidental to the sablefish fishery,
- retention of Pacific halibut incidental to the salmon troll fishery, and
- sport charter fisheries.

These are annual licenses, for which an application must be submitted to the IPHC each year by the specified deadline. There is no set maximum number of licenses allowed, and the number of licenses issued from year to year may vary. If a vessel chooses to participate in the sport charter fishery or to retain Pacific halibut incidental to the salmon troll fishery, it may not participate in any other Pacific halibut fisheries in IPHC Regulatory Area 2A. However, vessels may apply for two separate licenses to participate in both the directed commercial fishery and the Pacific halibut fishery incidental to the sablefish fishery. Not all vessels issued a license for a given year actually participate in the Pacific halibut fishery.

Commercial Pacific halibut licenses specify the vessel's length class, which ranges from A to H, with A being the smallest vessels (25 ft and under) and H being the largest (56 ft and over).

Table 1 provides a summary of commercial Pacific halibut licenses issued by IPHC each year between 2012 and 2017, along with how many vessels actually participated in the Pacific halibut fishery that year. About half of the vessels issued licenses to participate in the directed commercial fishery actually fished. The number of licenses issued for the directed commercial range from a low of 143 in 2013 to a high of 208 in 2017. The greatest number of vessels that actually participated in the directed commercial derby was 97 in 2012.

Table 1. Number of vessels issued an IPHC commercial Pacific halibut license and percent fished in IPHC Regulatory Area 2A between 2012 and 2017 by commercial license type. Data on the 2017 licenses fished are not yet available.

2A LICENSES (#s)		*2012*	*2013*	*2014*	*2015*	*2016*	*2017*
Total commercial derby	*Issued*	*175*	*143*	*162*	*144*	*169*	*208*
	Fished	*97*	*68*	*71*	*77*	*93*	
	% fished	*55%*	*48%*	*44%*	*53%*	*55%*	
Directed commercial	Issued	156	123	138	129	159	192
	Fished	81	55	54	65	85	
	% fished	*52%*	*45%*	*39%*	*50%*	*53%*	
Licensed for both directed and incidental to sablefish	Issued	19	20	24	15	10	16
	Fished	16	13	17	12	8	
	% fished	*84%*	*65%*	*71%*	*80%*	*80%*	
Incidental to sablefish	Issued	2	6	5	7	8	8
	Fished	1	6	3	6	6	
	% fished	*50%*	*100%*	*60%*	*86%*	*75%*	
Incidental to salmon	Issued	311	333	424	364	310	222
	Fished	104	101	181	151	128	
	% fished	*33%*	*30%*	*43%*	*41%*	*41%*	
Total commercial	*Issued*	*488*	*482*	*591*	*515*	*487*	*438*
	Fished	*202*	*175*	*255*	*234*	*227*	
	% fished	*41%*	*36%*	*43%*	*45%*	*47%*	

Fishing Periods

The IPHC sets the fishing period dates as a series of potential 10-hour (0800-1800 hours local time) fishing periods specified in IPHC Regulation Section 8 (Fishing Periods), paragraph (2). In recent years, the potential fishing period dates have been on Wednesdays in late June and early July. The fishing period dates are decided each year through the IPHC's Annual Meeting process. Table 2 shows the potential dates for the commercial fishery between 2012 and 2017, along with the total number of days the fishery was open. From 2012 to 2015, the commercial fishery was open for two 10-hour fishing periods; in 2016 and 2017, there were three.

Table 2. Potential directed commercial Pacific halibut fishing period dates for IPHC Regulatory Area 2A between 2012 and 2017 and total number of days open.

FISHING PERIODS	*2012*	*2013*	*2014*	*2015*	*2016*	*2017*
Total open days	2	2	2	2	3	3
Potential open days (bold dates were open)	**27 Jun**	**26 Jun**	**25 Jun**	**24 Jun**	**22 Jun**	**28 Jun**
	11 Jul	**10 Jul**	**9 Jul**	**8 Jul**	**6 Jul**	**12 Jul**
	25 Jul	24 Jul	23 Jul	22 Jul	**20 Jul**	**26 Jul**
	8 Aug	7 Aug	6 Aug	5 Aug	3 Aug	9 Aug
	22 Aug	21 Aug	20 Aug	19 Aug	17 Aug	23 Aug
	5 Sep	4 Sep	3 Sep	2 Sep	31 Aug	6 Sep
	19 Sep	18 Sep	17 Sep	16 Sep	14 Sep	20 Sep
					28 Sep	

Vessel Fishing Period Limits

Along with announcing open dates for the directed commercial fishery, the IPHC announces what the per-vessel catch limits will be by vessel class in accordance with IPHC Regulation Section 12 (Fishing Period Limits). IPHC determines the fishing period limits before each 10-hour fishing period opens, based on the number of vessels in each length class, the average performance of vessels in that length class, and the amount of catch allocated to (or remaining for) the directed commercial fishery for that year. The IPHC vessel length classes range from A to H, with A being the smallest vessels (25 ft and under) and H being the longest (56 ft and over). The IPHC first set limits by vessel class size to address the concern that having a single limit would disadvantage larger vessels while smaller vessels would be unaffected. The IPHC adopted the relative vessel size limits at its Annual Meeting in 1988.

In recent years the IPHC has set fishing period limits for the first 10-hour fishing period of the year that range from 9,000 lbs (4.08 mt)(net weight[1]) for the H-class vessels down to a limit of 755 lbs (0.34 mt) for the smallest A-class vessels. After each open fishing period, IPHC reviews available fish tickets and contacts processors and state biologists to estimate the Pacific halibut landings by vessel. This landings and participation information is used to determine how much of the directed commercial fishery allocation remains, whether there can be another open fishing period, and what the fishing period limits should be for the next open fishing period.

In addition to the fact that not all vessels with licenses traditionally participate in the open derby fishing periods, most vessels also do not come close to their full vessel limit during a fishing period. On average among all vessel size classes in 2016 and 2017, vessels caught from 20 to 40 percent of the fishing period limit for their vessel size class. In general, only a handful of vessels come close to or achieve their full vessel limit during a fishing period.

[1] "Net weight" is defined in IPHC Regulation 3 as the weight without gills and entrails, head-off, washed, and without ice and slime. All weights in this paper are expressed in terms of "net weight."

Table 3 provides the vessel length overall and the corresponding vessel class, along with the fishing period limits for each open fishing period from 2012 through 2017. Table 3 also provides the estimated landings by open fishing period compared to the overall directed fishery catch limit for that year.

Table 3. Vessel limits by vessel class and estimated landings (lbs, net weight) by open fishing period for IPHC Regulatory Area 2A between 2012 and 2017. Note: 2017 landing estimates are preliminary.

Vessel Class		Fishing Period & Limits (lb, net weight)					
feet	*letter*	*27 Jun 2012*	*11 Jul 2012*	*26 Jun 2013*	*10 Jul 2013*	*25 Jun 2014*	*9 Jul 2014*
1-25	A	755	200	755	250	755	200
26-30	B	945	200	945	315	945	210
31-35	C	1,510	250	1,510	505	1,510	335
36-40	D	4,165	695	4,165	1,390	4,165	925
41-45	E	4,480	745	4,480	1,495	4,480	995
46-50	F	5,365	895	5,365	1,790	5,365	1,190
51-55	G	5,985	1,000	5,985	1,995	5,985	1,330
56+	H	9,000	1,500	9,000	3,000	9,000	2,000
estimated landings		150,000	29,000	118,000	54,000	133,000	30,000
total estimated landings			**179,000**		**172,000**		**163,000**
catch limit			173,216		173,390		168,137
difference			-5,784		1,390		5,137

Vessel Class		Fishing Period & Limits (lb, net weight)							
feet	*letter*	*24 Jun 2015*	*8 Jul 2015*	*22 Jun 2016*	*6 Jul 2016*	*20 Jul 2016*	*28 Jun 2017*	*12 Jul 2017*	*26 Jul 2017*
1-25	A	755	505	755	755	210	755	755	590
26-30	B	945	630	945	945	265	945	945	735
31-35	C	1,510	1,010	1,510	1,510	420	1,510	1,510	1,175
36-40	D	4,165	2,780	4,165	4,165	1,160	4,165	4,165	3,240
41-45	E	4,480	2,990	4,480	4,480	1,245	4,480	4,480	3,485
46-50	F	5,365	3,575	5,365	5,365	1,490	5,365	5,365	4,170
51-55	G	5,985	3,990	5,985	5,985	1,665	5,985	5,985	4,655
56+	H	9,000	6,000	9,000	9,000	2,500	9,000	9,000	7,000
estimated landings		105,000	75,000	89,800	83,200	25,000	83,000	77,500	69,500
total estimated landings			**180,000**			**198,000**			**230,000**
catch limit			164,529			193,364			225,591
difference			-15,471			-4,636			-4,409

Fishing Period Options under Discussion

In response to the PFMC's informal request, the IPHC details below information regarding examples of fishing period limits for the directed commercial Pacific halibut fishery for the 3 requested fishing period durations of 1 week, 20 days, or 30 days, compared to the current 10-hour derby-style fishing periods. These examples are built using the 2017 allocation and 2017 license numbers as the most recent year with complete information. **NOTE**: THE IPHC DOES NOT RECOMMEND OR ENDORSE ANY OF THE 3 OPTIONS DETAILED BELOW.

While only about half of the licenses issued have actually participated in open derby-style fishing periods since 2012 (Table 1) and most vessels only catch between 20 and 40 percent of their fishing period limit, the IPHC assumes for this analysis that more licensed vessels would likely participate and that more vessels would catch their limits during a longer fishing period.

Using 2017 numbers, these examples assume 208 licensed vessels would participate, and that each vessel's fishing period limit could be fished at any time during the fishing period. The fishing period limits are based on the 2017 non-treaty directed commercial fishery catch limit of 225,591 lbs (102.33 mt) (net weight). These options assume that IPHC Regulations would allow vessels to also fish for other species while fishing for Pacific halibut, subject to the U.S. domestic regulations and license requirements for those species.

Option 1 – *1-week fishing period*

Option 1 assigns a 1-week fishing period limit by vessel size class. At any time during the 7-consecutive-day fishing period announced by the IPHC, vessels could retain the amount of Pacific halibut associated with their vessel size class.

The IPHC, working with the state agencies and NMFS, would manage the fishery in season, similar to the current derby fishery. If enough allocation remained after the first 1-week fishing period, the IPHC would reopen the fishery for another 1-week period. Any subsequent 1-week fishing periods would likely be two to three weeks after the preceding 1-week fishing period to allow time to gather and review the Pacific halibut landings data and vessel participation.

The IPHC provides several examples of fishing period limits using the 2017 allocation (Table 4). Note that these example fishing period limits are provided only for purpose of discussion.

For comparison with these examples of fishing period limits, Table 4 also lists the recent historical (or status quo) series of fishing period limits based on the 9,000-lb (4.08 mt) (net weight) limit for the H-class vessels used in the current 10-hour fishing periods, with the smaller vessel classes scaled accordingly. This option would not be chosen for a longer fishing period because it is projected to exceed the allocation. Other potential H-class fishing period limits range from 2,000 to 6,000 lbs (0.91 to 2.72 mt) (net weight). The bottom of Table 4 shows three scenarios: 1) the estimated landings if all of the licensed vessels participate and land their full limits, 2) if half of the licensed vessels participate and land their full limits, and 3) if half of the vessels participate and land half of their limits. The third scenario is estimated to be unlikely to occur, given the longer fishing period. The level of participation and attainment of individual vessel limits will more likely fall somewhere between the first and third scenarios. As the season is extended longer in subsequent options, from 1 week to 20 days or 30 days, the IPHC expects there to be a higher likelihood of more licensed vessels participating and landing a higher percentage of their fishing period limits.

Under Option 1, using the 2017 allocation of 225,591 lbs (102.33 mt) (net weight), the IPHC would likely choose fishing period limits based on an H-class limit of 4,000 to 6,000 lbs (1.81 to 2.72 mt) (net weight) for the first 1-week fishing period. This is based on attainment of the H-class fishing period limit when it was 9,000 lbs (4.08 mt) by the vessels in this size class (2012-16). In these years, approximately 40 percent of these vessels attained the trip limit with 60 percent landing 6,000 lbs (2.72 mt) or more, and 90 percent landing 4,000 lbs (1.81 mt) or more.

Table 4. *Vessel limits options by vessel class and estimated landings (lb, net weight) for IPHC Regulatory Area 2A using 2017 allocation and licenses.*

2017 allocation (lb, net weight) 225,591

Vessel Class		*vessel limit ratio*	*2017 # Lic (208 total)*	*status quo*		*6,000 vessel limit*		*4,000 vessel limit*		*2,000 vessel limit*	
feet	letter			vessel limit	est. landings	vessel limit	est. landings	vessel limit	est. landings	vessel limit	est. landings
1-25	A	0.084	15	**755**	11,325	**505**	7,575	**335**	5,025	**200**	3,000
26-30	B	0.105	11	**945**	10,395	**630**	6,930	**420**	4,620	**210**	2,310
31-35	C	0.168	19	**1,510**	28,690	**1,010**	19,190	**670**	12,730	**335**	6,365
36-40	D	0.463	39	**4,165**	162,435	**2,780**	108,420	**1,850**	72,150	**925**	36,075
41-45	E	0.498	43	**4,480**	192,640	**2,990**	128,570	**1,990**	85,570	**995**	42,785
46-50	F	0.596	36	**5,365**	193,140	**3,575**	128,700	**2,385**	85,860	**1,190**	42,840
51-55	G	0.665	14	**5,985**	83,790	**3,990**	55,860	**2,660**	37,240	**1,330**	18,620
56+	H	1	31	**9,000**	279,000	**6,000**	186,000	**4,000**	124,000	**2,000**	62,000
If 100% of licenses participate & land 100% of vessel limit					961,415		641,245		427,195		213,995
If 50% of licenses participate & land 100% of vessel limit					480,708		320,623		213,598		106,998
If 50% of licenses participate & land 50% of vessel limit					240,354		160,311		106,799		53,499

***Option 2** – 20-day fishing period*

Option 2 assigns a 20-day fishing period limit by vessel size class. At any time during the 20-consecutive-day fishing period announced by the IPHC, vessels could retain the amount of Pacific halibut associated with their vessel size class.

The IPHC, working with the state agencies and NMFS, would manage the fishery in season, similar to the current derby fishery. If enough allocation remained after the first 20-day fishing period, the IPHC would reopen the fishery for another 20-day period. A sub-option could allow subsequent fishing periods of less than 20 days but not shorter than one week. Any subsequent fishing periods would likely start at least 10 days after the preceding fishing period to allow enough time to gather and review the Pacific halibut landings data and vessel participation.

The IPHC provides several examples of fishing period limits using the 2017 allocation (Table 4). Note that these example fishing period limits are provided only for purpose of discussion.

For comparison with these examples of fishing period limits, Table 4 also lists the recent historical (or status quo) series of fishing period limits based on the 9,000-lb (4.08 mt) (net weight) limit for the H-class vessels used in the current 10-hour fishing periods, with the smaller vessel classes scaled accordingly. This option would not be chosen for a longer fishing period because it is projected to exceed the allocation. Other potential H-class fishing period limits range from 2,000 to 6,000 lbs (0.91 to 2.72 mt) (net weight). The bottom of Table 4 shows three scenarios: 1) the estimated landings if all of the licensed vessels participate and land their full limits, 2) if half of the licensed vessels participate and land their full limits, and 3) if half of the vessels participate and land half of their limits. The third scenario is estimated to be unlikely to occur, given the longer fishing period. The level of participation and attainment of individual vessel limits will more likely fall somewhere between the first and third scenarios. As the season is extended, the IPHC expects there to be a higher likelihood of more licensed vessels participating and landing a higher percentage of their fishing period limits.

Under Option 2, using the 2017 allocation of 225,591 lbs (102.33 mt) (net weight), the IPHC would likely choose fishing period limits based on an H-class limit of 2,000 to 4,000 lbs (0.91 to 1.81 mt) (net weight) for the first 20-day fishing period. With a 20-day fishery, as opposed to a 1-week fishery, IPHC would have to be more conservative in setting the vessel limit because with more time to fish, more vessels would likely participate and would more likely catch their vessel limit.

***Option 3** – 30-day fishing period*

Option 3 assigns a 30-day fishing period limit by vessel size class. At any time during the 30-consecutive-day fishing period announced by the IPHC, vessels could retain the amount of Pacific halibut associated with their vessel size class.

The IPHC, working with the state agencies and NMFS, would manage the fishery in season, similar to the current derby fishery. If enough allocation remained after the first 30-day fishing period, the IPHC would reopen the fishery for another 30-day period. A sub-option could allow subsequent fishing periods of less than 30 days but not shorter than one week. Any subsequent fishing periods would likely start at least 10 days after the preceding fishing period to allow enough time to gather and review the Pacific halibut landings data and vessel participation.

The IPHC provides several examples of fishing period limits using the 2017 allocation (Table 4). Note that these example fishing period limits are provided only for purpose of discussion.

For comparison with these examples of fishing period limits, Table 4 also lists the recent historical (or status quo) series of fishing period limits based on the 9,000-lb (4.08 mt) (net weight) limit for the H-class vessels used in the current 10-hour fishing periods, with the smaller vessel classes scaled accordingly. This option would not be chosen for a longer fishing period because it is projected to exceed the allocation. Other potential H-class fishing period limits range from 2,000 to 6,000 lbs (0.91 to 2.72 mt) (net weight). The bottom of Table 4 shows three scenarios: 1) the estimated landings if all of the licensed vessels participate and land their full limits, 2) if half of the licensed vessels participate and land their full limits, and 3) if half of the vessels participate and land half of their limits. The third scenario is estimated to be unlikely to occur, given the longer fishing period. The level of participation and attainment of individual vessel limits will more likely fall somewhere between the first and third scenarios. As the season is extended, the IPHC expects there to be a higher likelihood of more licensed vessels participating and landing a higher percentage of their fishing period limits.

Under Option 3, using the 2017 allocation of 225,591 lbs (102.33 mt) (net weight), the IPHC would likely choose fishing period limits based on an H-class limit of 2,000 lbs (0.91 mt) (net weight) for the first 30-day fishing period. With a 30-day fishery, as opposed to a 1-week or 20-day fishery, IPHC would have to be more conservative in setting the vessel limit because with more time to fish, more vessels would likely participate and would more likely catch their vessel limit.

Other Considerations for Longer Fishing Periods

The IPHC expects the overall attainment of the directed commercial fishery allocation would be approximately the same with longer fishing periods, with the management target of attaining but not exceeding the allocation. There might be some shift in the spatial distribution of fishing with an extended fishing period as fishers have more time to explore fishing grounds without the pressure of a short deadline to catch their vessel fishing period limits.

For the IPHC, longer fishing periods would require revisions to the biological sampling program that provides age, length, and weight data for the annual Pacific halibut stock assessment. Historically, the IPHC has focused biological sampling effort around the first two or three 10-hour open fishing periods, in the port where the highest number of pounds are landed. In 2017, in response to changes in landing patterns, the IPHC increased this effort and collected biological samples in three separate ports over the three open fishing periods. With longer fishing periods, the landings would likely be spread over a longer period of time and the individual landings may be smaller. Therefore, in order to obtain the necessary biological data for the Pacific halibut stock assessment, the IPHC would likely need to staff more ports for a greater length of time or coordinate with state agencies to obtain biological samples.

Conclusions

As noted in the discussion of the suggested options above, the IPHC expects that fishing period limits for individual vessels would be lower with longer fishing periods under the current

management system in place for the directed commercial Pacific halibut fishery in IPHC Regulatory Area 2A.

The IPHC noted in its letter to the PFMC (Agenda Item G.1.a, Supplemental IPHC Letter 2, June 2017) that it sees no compelling reason to maintain the directed commercial Pacific halibut fishery in IPHC Regulatory Area 2A as a derby-style fishery, and that there may be a number of advantages in shifting to a management system that reduces the concentration of fishing effort and eliminates or reduces the race to fish.

The primary potential advantage of longer fishing periods is improved safety as fishers experience less pressure to fish in poor weather or dangerous conditions. The IPHC believes that this is the strongest rationale for change, and this position has been supported by the U.S. Coast Guard. Other potential advantages include reduced Pacific halibut mortality from regulatory discards and increased flexibility for fishers and processors as they manage their industry sector.

The IPHC desires to understand the views of those affected by longer fishing periods and reduced fishing period limits in IPHC Regulatory Area 2A before making any such changes, and appreciates the opportunity to discuss possible changes with the PFMC, its advisory bodies, and the relevant state and federal agencies. The IPHC also welcomes other suggestions or recommendations to improve the management of the directed commercial Pacific halibut fishery in IPHC Regulatory Area 2A.

08/24/18