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## INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

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EL2019024  
23 August 2019

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

### Re: Use of the term 'TCEY' in Pacific halibut catch sharing plans

Dear Mr. Anderson,

As the PFMC evaluates changes to its Pacific Halibut Catch Sharing Plan (CSP) for IPHC Regulatory Area 2A for 2020, the IPHC offers a suggestion for your consideration to better harmonize the interacting processes of our two organizations.

You may recall that, in order to use the same measure across all IPHC Regulatory Areas, the Commission shifted in 2018 to making its annual removal decisions in terms of 'Total Constant Exploitation Yield' (TCEY). The catch sharing arrangements currently in use by the two Contracting Parties, including the PFMC's CSP for IPHC Regulatory Area 2A, were developed prior to this change, and use the term 'Fishery Constant Exploitation Yield' (FCEY) as their entering argument.

The definition of FCEY varies among the IPHC Regulatory Areas, requiring a translation step to pass from the Commission's TCEY decision via FCEY to the domestically assigned sector allocations in each IPHC Regulatory Area. This translation step uses data provided by the Contracting Party to derive a management quantity that the Contracting Party then uses in direct management of Pacific halibut fisheries.

We believe that it would be an improvement, in terms of simplicity and transparency, if the Contracting Party catch sharing arrangements used TCEY as their input instead of FCEY, and directly incorporated the necessary adjustments to get from TCEY to the resulting sector allocations. This would make a clearer and sharper distinction between the Commission's overall removal decision and the resulting domestic allocation among sectors.

The IPHC looks forward to continuing our strong partnership with the PFMC for the sustainable management of the Pacific halibut resource. We are ready to assist as you consider changes to the CSP for 2020.

Sincerely,



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

cc: IPHC Commissioners  
Chuck Tracy, PFMC