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## INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

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EL2019001  
25 January 2019

Mr. Philip Anderson  
Chair, 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, 

I would like to express my appreciation for the extended discussion by the PFMC and its subsidiary bodies over the past year and a half on options to improve the management of the non-treaty directed commercial Pacific halibut fishery in IPHC Regulatory Area 2A.

We have received your letter of 16 November 2018 with the PFMC's suggestions regarding the regulatory proposal currently before the Commission to extend the fishing period in the non-treaty directed commercial Pacific halibut fishery in IPHC Regulatory Area 2A. Your letter was provided to the Commission for its consideration at the 94<sup>th</sup> Interim Meeting (IM094) as meeting document IPHC-2018-IM094-INF05, and for the 95<sup>th</sup> Annual Meeting (AM095) within paper IPHC-2019-AM095-PropA2.

We welcome engagement with the PFMC on the concerns raised in your letter, noting that they do not require immediate resolution in order to proceed with a fishing period extension. An extension of the fishing period represents a substantial safety improvement without a significant change in management, and can be implemented within the current management structure of the fishery.

As noted in previous discussion and in your letter, this proposed fishing period extension would be an interim step towards larger changes in management of the IPHC Regulatory Area 2A fishery. Of the concerns raised in your letter, we believe that the longer-term economic sustainability, and timing of the fishery are most relevant to additional decisions by the Commission, and we look for input on each of those aspects. We welcome the proposal of a joint meeting to discuss additional future changes to the IPHC Regulatory Area 2A fishery management structure in a more holistic way. In the meantime, in the interest of safety, we do not see a need to hold up consideration of this current proposal while conversation continues on the desirability and feasibility of further changes.

The IPHC continues to appreciate the constructive engagement by the PFMC on this topic, and looks forward to continuing our strong partnership for the sustainable management of the Pacific halibut resource.

Sincerely,



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

cc: IPHC Commissioners  
Chuck Tracy, PFMC