

ENFORCEMENT CONSULTANTS REPORT ON THE ANNUAL INTERNATIONAL  
PACIFIC HALIBUT COMMISSION (IPHC) MEETING REPORT

The Enforcement Consultants (EC) have reviewed the material associated with Agenda Item H.1 Annual IPHC Meeting Report, and have the following comments.

The EC is opposed to the addition of a 10-hour commercial halibut opener on June 27 due to significant enforcement concerns associated with having two fishing periods on consecutive days (i.e. June 26 and June 27). The Area 2A directed Halibut Fishery is an established limited derby style fishery with well-known regulations and strict gear and landing requirements. Scheduling two 10-hour commercial halibut fishing periods on consecutive days causes the following enforcement concerns:

1. The IPHC Area 2A regulations have been developed to support a stand-alone 10-hour fishing period. There are specific rules that address fishing prior to an opener, conduct during the opener, gear removal prior to a close of an opener, and continuous transit and complete offload of fish following the closure of the fishing period. Enforcement of these rules has been manageable due to the length of time between scheduled fishing periods and the coordination of state and Federal enforcement. The EC considers fishing periods separated by one week or more being enforceable under the current regulatory requirements.
2. Back to back fishing periods with only 14-hours between the closure of one period and the opening of another will significantly impact the ability to enforce both the at-sea and the shoreside component of this fishery. If the proposed back-to-back dates move forward as announced in the 2019 Pacific Halibut Fishery Regulations, there will be limited daylight patrol time available to ensure gear has been removed from the fishing grounds and that any vessels on the water during the closed hours do not have halibut on board. There are also not enough shoreside enforcement personnel available to monitor vessels that fished during the first fishing period, ensuring they complete an offload of all fish before returning to sea to participate in the second fishing period. Vessel Monitoring Systems are not required for the halibut fishery, so that is not a reliable monitoring tool for this fishery.

Enforcement is responsible for ensuring this fishery is orderly and fishers are compliant. There are simply not enough enforcement personnel to effectively monitor both aspects of this fishery simultaneously.

The EC strongly requests that the additional date of June 27 be removed and retain the dates approved by the commission at the IPHC Annual Meeting:

“The IPHC recommended an overall fishing period (season) of 15 March – 14 November 2019 for all commercial Pacific fisheries in Canada and the USA. In IPHC Regulatory Area 2A, the tribal commercial fisheries and the incidental Pacific halibut fisheries will occur within these dates, and the non-tribal directed commercial fishery will consist of 10-hour derby fishing periods, including but not limited to 26 June, 10 July, 24 July, 7 August, 21 August, 4 September, and 18 September.” IPHC-2019-NR004, 2/1/2019

PFMC  
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