North Pacific Fishery Management Council

Simon Kinneen, Chair | David Witherell, Executive Director
1007 W. 3rd Avenue, Suite 400, Anchorage, AK 99501
Phone 907-271-2809 | www.npfmc.org

December 31, 2019

Mr. Chris Oliver, Mr. Bob Alverson, Mr. Richard Yamada
U.S. Commissioners
International Pacific Halibut Commission
Send via Email

Dear Mr. Oliver, Mr. Alverson, and Mr. Yamada:

On behalf of the North Pacific Fishery Management Council, I am writing to provide the Council's comments and suggestions regarding U.S. positions relative to the upcoming IPHC annual meeting.

The Council appreciates recent analytical modifications to the Pacific halibut stock assessment. The Council noted the incorporation of genetic research to accurately determine sex composition of the catch in the directed commercial fishery, which is now widely understood to predominantly consist of older females. This information reflects positively on the IPHC's commitment to precautionary management of the spawning biomass, and greatly improves the assessment and our understanding of the impact of management measures.

The Council is concerned about the potential impacts of the IPHC's interim harvest policies, and their disproportional impacts on the directed fisheries for Pacific halibut off Alaska. The Council is particularly concerned about the incorporation of a new provision at the IPHC's Interim Meeting to include U26 bycatch within the IPHC's Total Constant Exploitation Yield (TCEY) limits. Based on the statements in the IPHC's 2019 Annual Report and communication with US Commissioners, our understanding was that the IPHC was evaluating this for future consideration, rather than treating it as an absolute commitment to adopt this new process during the 2020 annual TCEY specification process. The Council believes further evaluation is the appropriate next step, rather than proceeding directly to implementation, as the results from the interim meeting illustrate the disproportionately large impact this change, in combination with reduced biomass, will have on the directed fisheries in Alaska. Without further evaluation, this new IPHC management policy will include U26 bycatch within the TCEY even though it remains unclear how much benefit would accrue to the spawning biomass from this approach, while the significant negative impacts to directed harvesters in Alaska are very clear. This new procedure will also increase the already generous allocation provided to Canada. The interim management procedure to set the TCEY at 1.65 million net pounds for Area 2A irrespective of halibut distribution and biomass, and an interim management agreement with Canada together will have very large cumulative effects on the directed halibut fisheries off Alaska. These effects are further exacerbated by a reduced biomass.

Reduced TCEYs throughout Alaska will cause severe economic impacts to harvesters and fishing communities. As a result of new management provisions, incorporation of updated information on sex composition of the commercial harvest and stock distribution among areas, and reduced biomass, the TCEYs under consideration for Alaskan areas in general represent a significant decrease from harvest levels of the previous few years. For instance, the Area 3A adopted TCEY was up 8% in 2019 from the prior year, and in 2020 the TCEY could drop by 28% from 2019 levels while Area 4CDE could drop 20% from 2019 levels if set at the reference TCEY levels. Interannual changes of this magnitude, which the Council notes are very unusual for long-lived groundfish species, pose significant challenges to commercial and recreational directed users of the halibut resource. The economic impacts to harvesters

and communities will be severe and catch limits in some areas may not be sufficient to allow for viable CDQ and IFQ fisheries; we request the US Commissioners be cognizant of the severity of the economic disruption when establishing TCEYs and fishery catch limits for 2020, and ensure that the net result of reductions of this magnitude will result in conservation gains.

The Council has several suggestions for possible mitigation measures, without increasing the coastwide harvest rates above the reference SPR, to lessen the large negative economic impact that could occur in 2020:

- Begin developing a process to consistently account for U26 mortality in directed fisheries across all user groups. Currently, U26 mortality in the Area 2C and Area 3A charter fishery is deducted from the TCEY, this differs from how U26 mortality is deducted in other fishery sectors. Although data are not available to implement a consistent accounting method for 2020, the Council and ADF&G intend to evaluate available data on length distribution in the charter fishery and consider methods to sample charter harvest to determine sex composition. At the 2020 Annual Meeting, the IPHC should direct its staff to coordinate with ADF&G and the Council to develop a consistent method of accounting for U26 mortality in directed fisheries beginning in 2021. Longer-term, the Council continues to develop support for full implementation of the RQE, another tool to help mitigate the effects on the charter recreational fishery.
- Consider holding off on incorporating U26 bycatch in the TCEYs. As we understood it, in January 2019 the Commissioners only agreed to evaluate inclusion of U26 bycatch, but not necessarily implement it for 2020. The IPHC could greatly benefit from consultation with the Council in development of these changes before they are implemented (as we requested in our 2/25/2019 letter to Dr. Wilson). Moreover, the amount of U26 bycatch represents a small amount of the total mortality of halibut and assigning that bycatch to specific areas is challenging given the great uncertainty about the migration of halibut among areas. The conservation benefit of this approach should be thoroughly evaluated before implementation.
- You may wish to consider alternative methods to using 2019 O26 bycatch as projected O26 bycatch when calculating the 2020 TCEYs and fishery catch limits. The 2019 bycatch in the Bering Sea increased from 2018, but it is not at all clear if last year's bycatch is representative of future bycatch. Much of the change may be due to the overlap of halibut and groundfish on the fishing grounds, which is quite variable from year to year. In the Gulf of Alaska, closure of the Pacific cod fishery could reduce the incidental catches of halibut in 2020, depending on how much effort is transferred to flatfish target fisheries. In calculating the annual TCEYs for its fisheries, the IPHC relies on the previous year's estimated bycatch to project future O26 bycatch. It appears that 2019 was an unusual year for halibut bycatch in the groundfish fisheries with noticeable changes in both the quantity and size composition of that bycatch, based on stakeholder reports. Alternative methods to project O26 bycatch for 2020 could include:
    - Closer consideration of 2019 bycatch data and potential bycatch performance of groundfish fisheries in 2020 could suggest a lower estimate of bycatch may be more appropriate and a higher TCEY can be accommodated without risk to the halibut stock.
    - Use a three-year rolling average of bycatch amounts in each area to dampen year-to-year fluctuations, much like is done for groundfish TAC allocations among management subareas.
- Examine the harvest rates to determine if they are appropriate given changes in stock productivity among IPHC biological regions and management areas. For example, as scientists indicated at the IPHC's Interim Meeting, productivity in the Western Gulf of Alaska (Area 3B) and the Bering Sea is similar to that of the eastern portion of the stock. Thus, it may be appropriate to change the harvest rates in some or all of these management areas to reflect this improved understanding of stock productivity.

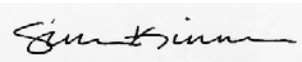
It is clear that periodic recruitment events drive the TCEYs and fishery catch limits. In the longer term, the Council urges the IPHC to prioritize exploration of other fishery management measures to conserve spawning biomass other than reductions in fishery catch limits. Such actions could reduce impacts and increase optimum yields. For example, decreasing the minimum size in the commercial directed fishery would increase harvester access to male halibut. These "additional males" are not currently accessible to the commercial harvest as it is now well established that many of them never grow large enough to enter the legal size, but harvest of these fish would have some economic benefit for hard-hit harvesters and communities. In addition, the IPHC could consider establishing a maximum size limit that would apply to all fisheries to conserve large females and their fecundity, and to decrease the fishery dependence on older, larger females.

The Council is committed to continue its work to emphasize bycatch controls to help mitigate economic impacts to directed users. The groundfish fleets will continue to use the variety of available tools, including deck sorting and avoiding areas of relatively high incidental catch rates, that have achieved the bycatch reductions attained in recent years. Additionally, the Council remains committed to developing an abundance-based halibut bycatch program for the groundfish fisheries to provide a responsive management approach at all levels of halibut abundance.

The Council requests that U.S. Commissioners consider these mitigation suggestions and requests U.S. Commissioners remain cognizant of the unusual levels of economic disruption that could be felt by harvesters and communities in many Alaska areas in 2020.

Thank you for your consideration of these suggestions.

Sincerely,



Simon Kinneen

Council Chair