

March 27, 2017

Mr. Dan Hull, Chairman
North Pacific Fishery Management Council
605 W. 4th, Suite 306
Anchorage, AK 99501-2252

RE: **Comments to Agenda Item C-7 Bering Sea and Aleutian Island Abundance-Based Halibut PSC**

Dear Chairman Hull:

The following comments and recommendation are provided to you from the Fishing Vessel Owners' Association (FVOA) and Deep Sea Fishermen's Union of the Pacific (DSFU). The FVOA is a trade association representing 95 family-owned longline vessels. It has been representing fixed-gear interests since 1914. The DSFU was established in 1912 and is not only the oldest, but also the sole, fishing union in Washington and the United States still working tirelessly to advocate for fair wages, safe working conditions, and supporting our widely-recognized, sustainable, and well-managed fixed-gear fisheries. Both organizations have a direct interest in reducing halibut bycatch in the Bering Sea. Both organizations have members fishing in all the U.S. IPHC regulatory areas ranging from the Bering Sea to Area 2A off Washington and Oregon.

The following option addresses the interest of the North Pacific Fishery Management Council (NPFMC) in the development of an abundance-based halibut PSC mechanism for the Bering Sea and Aleutian Islands. The Council's working committee has identified two, important decision points: the starting PSC use amount for an abundance-based program, and the mechanism that would result in a plus or minus function based on halibut abundance. The ability, annually or otherwise periodically, to allow the PSC use amount to fluctuate based on certain scientific and economic data inputs requires a framework

amendment to the Bering Sea Groundfish Plan. Accordingly, the FVOA and DSFU submit the following, proposed, framework plan.

Our option puts the Council in control at all times when adjusting the PSC use CAP for different sectors of the groundfish fishery. As industry technology advances, the Council can take precautionary, incremental steps to reduce the use CAP in the interest of bycatch management, without the fear of causing undue economic impact on the directed fisheries. By the same token, as the densities of halibut and/or groundfish target species change, up or down, the Council can respond.

The approach we offer is to have the Council analyze a range of potential future reductions from the current PSC limits. We recommend the starting point be the current PSC CAPs. We recommend analysis of a range of possible reductions between 35 to 50 percent from the current PSC use amounts. This would represent the maximum potential reduction limit. PSC reductions would be achieved with the Council making annual incremental movements in the PSC usage to achieve long-term reduction goals through their current “specs” process. Reduction of the halibut PSC use limits would be constrained to not more than zero to 3 percent annually. The Council would apply the reductions until the groundfish fleets minimize bycatch and mortality of unavoidable bycatch to the extent practicable until PSC limits equal the amount of bycatch the fleets were actually experiencing at the end of 2016. After PSC use levels were reduced to current usages, the Council would move the PSC level ± 3 percent on an annual basis.

At the end of 2016, the freezer longline fleet was using 60% of its current CAP. It might be expected that the Council would ratchet down PSC over a period of four or five years to reach that level of actual bycatch. For the Amendment 80 fleet, the bycatch for 2016 was 1492 Mt and it might be expected that the PSC would be reduced to that level in three or four years.

This option could be developed as part of any future, abundance-based program or developed as a stand-alone amendment to the current Bering Sea and Aleutian Island Groundfish Management Plan. Amendments could be offered to it when a holistic abundance-based concept was completed by the Council and IPHC staff.

Considering that the abundance-based bycatch science will not be completed for as long as ten years, the FVOA and the DSFU suggest the adoption of this option as a stand-alone amendment. The phased approach to CAP reductions would allow the groundfish fleet to calibrate solutions, and would incentivize the fleets by letting them know that PSC reductions are an ongoing concern.

Sincerely,

FISHING VESSEL OWNERS' ASSOCIATION



Robert D. Alverson
Manager

Sincerely,

DEEP SEA FISHERMEN'S UNION



James J. Johnson
Executive Director

RDA:cb