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C9 IPHC Comment ABM - OCTOBER 2017

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INTERNATIONAL PACIFIC HALIBUT COMMISSION

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ESTABLISHED BY A CONVENTION BETWEEN CANADA

AND THE UNITED STATES OF AMERICA

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28 September 2017

Mr. Dan Hull, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

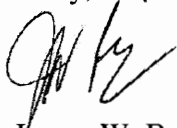
Dear Mr. Hull:

The International Pacific Halibut Commission (IPHC) notes with interest the discussion paper which has been prepared for Agenda Item C9 at the North Pacific Fishery Management Council's (NPFMC) October 2017 meeting: Abundance-based Management for BSAI Pacific Halibut PSC Limits.

Section 1.2 of the paper describes the shared management accountability and responsibility for the Pacific halibut resource between the IPHC and the NPFMC. The IPHC appreciates that the NPFMC's purpose and need statement in Section 2 includes among its goals providing for directed Pacific halibut fishing operations in the Bering Sea. Discussing the relative authorities of the NPFMC and the IPHC, the paper notes that the IPHC sets the commercial Pacific halibut catch limits, and that the NPFMC sets the Pacific halibut bycatch limits in the groundfish fisheries – one of the factors that affects harvest limits for the commercial Pacific halibut fisheries. While mindful of the different authorities of our two bodies, the IPHC believes that actions by the NPFMC nevertheless can have a direct effect on the directed Pacific halibut fishery. Therefore, the IPHC encourages the NPFMC to retain the objectives “2) Halibut spawning stock biomass should be protected, especially at lower levels of abundance,” and “4) Provide for directed halibut fishing operations in the Bering Sea” in the purpose and need statement for this action.

The IPHC appreciates both the emphasis on incentives in Section 6 of the paper and the discussion of coordination with the IPHC in Section 7.2. The IPHC agrees that coordination is very important and believes that there are a number of possible paths forward for coordinated abundance-based management of Pacific halibut PSC limits. The IPHC welcomes the opportunity to work with the NPFMC on both our shared and our complementary goals with respect to the Pacific halibut stock and fishery.

Sincerely,



Dr. James W. Balsiger
Chairperson
International Pacific Halibut Commission

cc: IPHC Commissioners
Dr. Wilson, Executive Director IPHC
Mr. Witherell, Executive Director NPFMC