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INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

DIRECTOR
BRUCE M. LEAMAN
2320 W. COMMODORE WY, STE 300
SEATTLE, WA 98199-1287
TELEPHONE:
(206) 634-1838
FAX:
(206) 632-2983

June 17, 2015

Ms. Eileen Sobeck
Assistant Administrator for Fisheries
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910

Dear Ms. Sobeck:

In your January letter to the Commission's Executive Director, Dr. Leaman, you recommended that the Commission adopt 2015 catch limits for IPHC Area 4CDE that provided "adequate harvest opportunities" for the area. In part, your recommendation to the Commission was based on your commitment to reduce halibut bycatch in the Bering Sea/Aleutian Islands (BSAI) region and the Gulf of Alaska.

The Commission derives its authority from the Convention between Canada and the United States and is unaccustomed to receiving recommendations concerning catch limits from domestic agencies. Nonetheless, it recognizes the need to work with U.S. agencies and gave serious attention to your letter during its deliberations on catch limits at its January 2015 meeting. At that meeting, after considerable debate and testimony from the public and its advisory bodies, the Commission adopted a catch limit of 1.285 Mlb for Area 4CDE. That catch limit maintained the harvest opportunity for the area at the same level as in 2014 and requires a bycatch mortality of no greater than 4.29 Mlb to support the catch limit. The Commission voiced great concern over this decision because of uncertainty about whether bycatch mortality would be sufficiently reduced to support such a catch limit. In large part, the Commission's decision to endorse this catch limit was based on your commitment to reducing halibut bycatch in the BSAI.

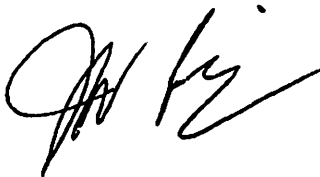
Although the 2015 IPHC catch limit remains the same as for 2014, during 2014 the estimated bycatch mortality in Area 4CDE increased from 4.29 Mlb to 4.56 Mlb. The Commission notes the negative trend of a growing proportion of the total available halibut yield for this area being expropriated to bycatch mortality. In 2014, this bycatch mortality was over 250% greater than directed halibut yield.

At its June 2015 meeting the NPFMC enacted changes to the BSAI limits on bycatch mortality (PSC limits), also after considerable testimony from the public and its advisory bodies. The PSC limits for the BSAI adopted by the Council totaled 5.804 Mlb compared to the existing PSC limits of 7.318 Mlb, i.e., a 20.7% reduction. However, the actual bycatch mortality for the BSAI in 2014 was 5.745 Mlb, approximately 21.4% below the existing PSC limit (Fig. 1). It was encouraging to see the change in the bottom trawl mortality limit drop by approximately 17% from 2014 use, however the net change of the new BSAI PSC limits from actual 2014 bycatch mortality is only 0.7%.

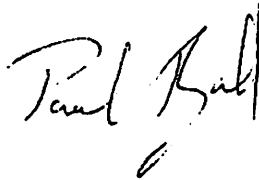
We recognize that the Council has a number of considerations concerning PSC limits but the limits adopted by the Council fall far short of those required to support the catch limits adopted by Commission. The point of greatest concern to the Commission is that, in establishing a BSAI PSC limit only 0.7% below 2014 bycatch, the Council has not ensured any progress towards the meaningful bycatch reductions that are required to bring halibut management back into an acceptable conservation framework. The Commission understands that the trawl sector may undertake some voluntary bycatch reduction in 2015, but in the absence of regulatory revisions which might allow measures such as deck sorting, previous experience indicates that it is unlikely that these voluntary actions will achieve the necessary mortality reductions. Indeed, testimony by trawl captains at the June Council meeting indicated that they had hopes for only very limited reductions beyond the current bycatch levels.

The Commission's catch limit decisions for 2015 were based upon an expectation that further bycatch mortality reductions would be implemented in 2016 to support the catch limits adopted by the Commission. Accordingly, the Commission requests that you outline your plan for further steps that will be taken to implement and effectively monitor the necessary bycatch reductions in the BSAI. We appreciate your previous commitments in this regard and we are prepared to work with you to effect positive actions as soon as possible.

Sincerely,



James W. Balsiger
Chair, IPHC



Paul Ryall
Vice-Chair, IPHC

cc: IPHC Commissioners

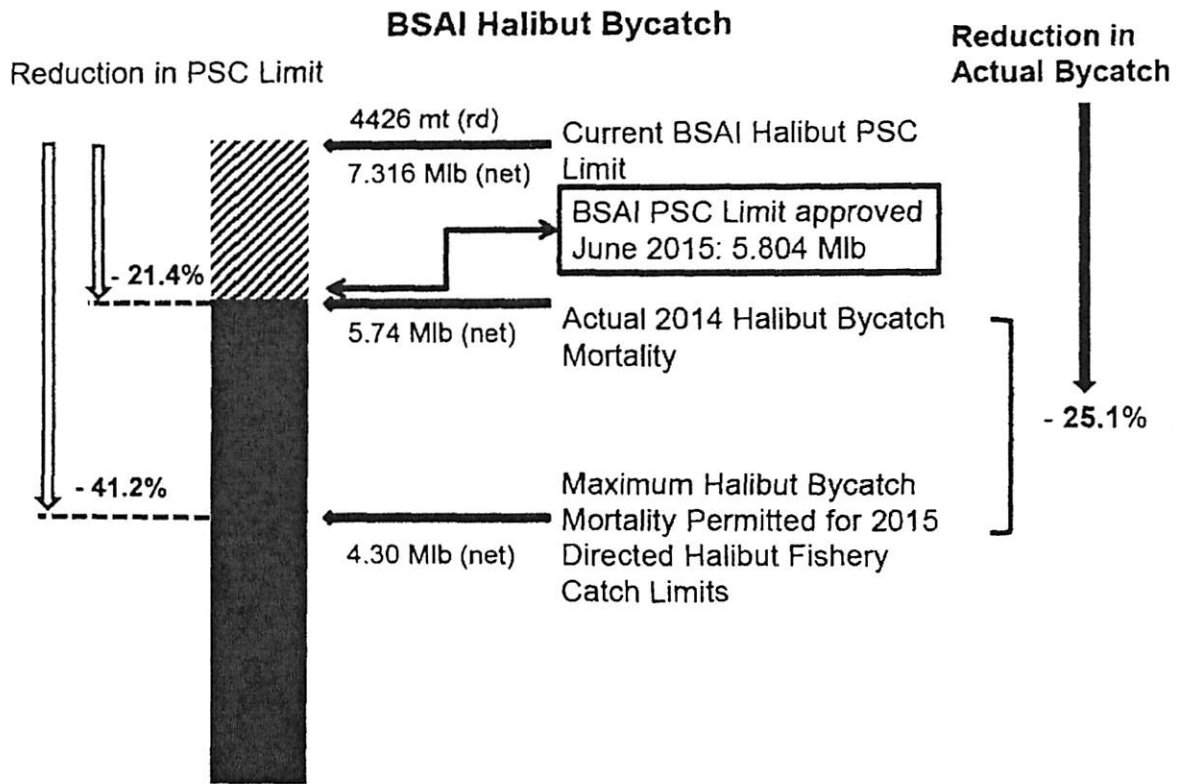


Figure 1.