



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

March 31, 2020

Bycatch Reduction Engineering Program
Office of Sustainable Fisheries
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910

To whom it may concern:

On behalf of the North Pacific Fishery Management Council (Council), I am providing this letter in support of the research proposal submitted to the NOAA Bycatch Reduction Engineering Program by Craig Rose and John Gauvin titled “Design Collaboration to Identify the Most Promising Halibut Excluders for Field Testing.” Specifically, this proposal seeks to create collaborative scale-model testing of new halibut excluder designs for trawl gear focused on reducing bycatch by improving the escape of larger halibut and reducing loss rates of target catch.

Development of an effective halibut excluder design is very important to the Council’s objectives and work plan given the downturn in halibut abundance stock-wide and the Council’s on-going efforts to find ways to balance the limited amount of halibut biomass in the Bering Sea between directed and bycatch users. The Council has long-supported the development and improvement of “tools” for fishermen under its catch-share programs to allow fishermen to utilize groundfish stocks while minimizing bycatch. Halibut excluders are one of those tools, and this proposal provides an opportunity for a new design reflective of current challenges, as there has been a trend towards relatively smaller-sized halibut making up a larger fraction of the stock. Additionally, refocusing the emphasis on reducing bycatch of larger halibut and reducing loss rates of groundfish is a rational approach, given that directed halibut users are most immediately affected by bycatch of larger halibut.

The development of innovative excluder designs, leading to their testing under an Exempted Fishing Permit, are critical components of the industry’s response to the Council’s recent and expected actions to reduce halibut bycatch allowances for trawl fisheries of the Bering Sea in response to the continuing decline in Bering Sea halibut. In spite of quota shares management, multiple generations of excluders, bycatch avoidance tools, and expedited sorting to reduce release mortality, further reductions in bycatch allowances would likely reduce current yields from the fishery without new tools to reduce bycatch. The proposal would help fund design work, model-scale testing, and a collaboration by key captains and gear manufactures over four days of flume tank trials in the fall of 2020. This is intended to create a much-needed neutral and collaborative approach for consideration of excluder concepts. This proposal also addresses an urgent Council’s research priority: “Investigate gear modifications and changes in fishing practices to reduce bycatch and prohibited species catch.”

The Council, through its staff, is a collaborating partner on this project. Ms. Anna Henry, a staff analyst whose duties include analysis of halibut PSC management alternatives, will be participating in the halibut excluder collaboration project. Anna’s specific project responsibilities will include providing feedback on project reports and products and observing and participating in flume tank testing. She may also serve as a liaison between project participants and NMFS staff if necessary and assist in reporting project details and results to Council members.

Ms. Henry's current work includes analysis of a proposed Council action of abundance-based management of halibut bycatch limits in the Bering Sea and Aleutian Islands. This analysis involves describing potential impacts to the groundfish fishery as well as documenting the groundfish industry's efforts to avoid halibut encounter and limit mortality. Her involvement in the halibut excluder project will help inform the Council on the specific bycatch reduction strategies and gear modifications that are being implemented and researched by the groundfish industry. She will also provide project participants information regarding the management implications and implementation process for potential new gear modifications. We fully support Anna's participation in the halibut excluder collaboration project and believe her involvement will facilitate progress on this research.

In sum, the Council is pleased to collaborate and supports the proposal to identify the most promising halibut excluders for field testing. We greatly appreciate your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Witherell".

David Witherell
Executive Director

cc: Simon Kinneen
Craig Rose
John Gauvin
Anna Henry