



Alaska Trollers Association

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November 26, 2013

International Pacific Halibut Commission
2320 W. Commodore Way, Suite 300
Seattle, WA 98199-1287

RE: Draft Halibut Bycatch Workgroup Report

Dear IPHC Commissioners:

The Alaska Trollers Association (ATA) offers the following remarks on the November 21, 2013 draft report released by the Halibut Bycatch Workgroup (Workgroup). Given the limited time allotted to analyze the report our comments will be brief and broad. Our members have an interest in seeing more meaningful halibut bycatch solutions implemented in the Gulf of Alaska and Bering Sea.

Since 1925, ATA has represented the interests of small boat commercial hook and line salmon fishermen operating in state and federal waters off the coast of Alaska. With more than 2,600 permit holders, the troll fleet is the largest in the state and is 85% resident. Most of the fleet lives in small communities in Southeast Alaska and each year about 1 of every 35 people works on one of our boats. Troll vessels range from 16 to 58 feet in length. Since the late 1800's, halibut has been an important component of many troller's annual harvest.

The impacts of halibut bycatch in the trawl fishery has been increasingly questioned by halibut fishermen, particularly given recent year reductions in overall biomass and the growing level of removals attributed to bycatch. The draft report states that half of the halibut bycatch are small fish, many under 26". These younger, smaller fish have been more vulnerable to harvest in recent years. The Workgroup points to recruitment and reduced size at age as significant contributors to the low abundance that has created significant problems for the halibut industry.

Most trollers who longline hold IFQ in Areas 2C and 3A. Whether or not they received initial IFQ shares, many had to buy into the federally mandated program at great cost, simply to maintain a viable business. The promise of the IFQ program was a sustainable halibut population and a more stable and rational fishery. Instead, a precipitous drop in the annual halibut TAC has, in part, put fishermen at significant financial risk. This loss of product has heightened allocation disputes and led to some destabilization of the small boat halibut fleet.

Given variability in size and distribution, coupled with seasonal fisheries and the complexities of managing this far-ranging species, finding meaningful bycatch reduction measures is admittedly a difficult task. Yet some of the recommendations seem simplistic or do not seem geared towards reducing bycatch. For instance, Option #2 authorizes the retention and sale of halibut. Wouldn't full retention and sale effectively rubberstamp the current bycatch levels and incentivize targeting? The report points to the lack of catch estimation and monitoring for this option. Given federal budgetary constraints is it realistic to think this will improve in the near term? Allowing the sale of halibut seems counter-intuitive if the goal is to provide disincentives to catching them. Other prohibited species, like salmon, must be retained but can't be sold, creating an obvious

disincentive for fishing in areas where they're abundant; Option 2 does exactly the opposite. Why would we want that? And what is the quality of trawl halibut bycatch? Halibut fishermen and processors have worked hard over the years to improve the quality and marketing of this product. It would be an unfortunate and harmful side-effect if halibut markets were negatively impacted by this provision.

A number of other bycatch reduction measures were implemented pre-Magnuson-Stevens Act or are currently in place in the Lower 49 and Canada to reduce bycatch and protect nursery areas. Many of these strategies provide true disincentives and reduce bycatch. Two of those methods, time-area closures and individual vessel accountability, are identified in the report's list of options and are certainly worth exploring.

ATA primarily focuses on salmon issues and our expertise on trawl fisheries and areas is limited. However, as stated above, many of our members have a vested interest in the halibut resource and fishery. Therefore, it is most important to ATA that the IPHC, NPFMC, and NMFS work with the trawl fleet and knowledgeable halibut stakeholders to define the most practical set of tools to reduce bycatch.

ATA appreciates the efforts of the Workgroup and looks forward to reviewing the final work product. Hopefully the information will be additive, and not limiting, to the process of seeking solid solutions that benefit the resource and user groups.

Best regards,

Dale Kelley
Executive Director