



Alaska Longline

FISHERMEN'S ASSOCIATION

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

Dear Commissioners,

On behalf of the Alaska Longline Fishermen's Association (ALFA), I am submitting these comments on the CONCUR Performance Review recommendations. ALFA members depend on the halibut fishery and are committed to sustainable harvest of this valuable resource. Representatives from our organization have participated in the halibut management process since ALFA was formed as an organization in 1978. Management of the halibut resource and fishery is of utmost importance to our members and we hold the IPHC in high regard.

World-wide, very few fishery management agencies can claim the kind of long-term success as the Commission, and few fishermen can claim as significant a commitment to resource stewardship and management as halibut harvesters. While we believe the IPHC performance review is timely and we support many of the CONCUR recommendations, ALFA urges the Commissioners to carefully consider comments on the recommendations from active and long-term participants in the halibut industry prior to adopting or implementing change.

Below are ALFA's comments on the specific CONCUR recommendations.

Recommendation #1: Adopt Clear and Comprehensive Protocols/Rules for Procedure.

ALFA believes stakeholders and the Commission process would benefit from a document written in layman's terms that outlines the responsibilities, protocols and procedures for the various IPHC bodies. While much of this information is available in statute, a more accessible version would respond to concerns voiced by those new to the IPHC process. An expanded version of the document provided to the public in 2012 (*Navigating the IPHC meeting this week*) would improve public accessibility to the IPHC process.

While ALFA representatives do not participate directly in the Processor Advisory Board, many of our Associate Members do on an annual basis. The PAG operates with protocols and a mission statement

established in 2008. The PAG meetings are open to the public, encourage open discussion, and a deliberative decision making process. We were surprised to learn that very few members of the PAG, who represent close to 80% of the halibut processing capacity on the west coast, were not consulted in the CONCUR review and believe the results may have been weakened by that oversight. We support the existing PAG/Conference Board structure and believe the work of the two advisory bodies in complimentary.

The Conference Board process could be streamlined through published protocols that define participation criteria and process, and an annual deadline for notifying the Commission of intent to participate. The Conference Board would also benefit from expanded assistance of IPHC staff to answer questions and take notes (see additional comment under recommendation #3).

Recommendation #2: Improve Commission Transparency

ALFA agrees that the IPHC process would benefit from increased public deliberations by the Commissioners; in particular, ALFA strongly believes the process would benefit from public and clearly articulated rationale for IPHC decisions. The lack of decision-making transparency opens the door for speculation, accusation, and misunderstanding. Public discussion and debate among Commissioners and a published rationale to support Commission decisions would reduce stakeholder confusion and increase stakeholder confidence.

Recommendation #3: Revisit Stakeholder Engagement Structure – ALFA strongly **disagrees** with the recommendations in this section. The industry advisory panels provide the limited number of Commissioners with a broad range of perspectives, experience and knowledge; advisors work toward consensus when possible and articulate contrasting points of view when consensus cannot be reached. This format informs Commission decisions with the full range of perspectives.

The Conference Board functions as a true democracy with all active harvester groups qualified to sit at the table, share their perspective, make motions and vote. Broad representation in the Conference Board also serves to actively engage and educate a broader sector of the industry than would be reached by narrowing the advisory panels. Stakeholders are exposed to a broad range of perspectives, face each other when making recommendations or motions, and learn to appreciate regional and sector differences through discussion. A board of 24 “representatives” will not serve this function, nor can it adequately incorporate all the affected user groups.

As alternatives to the recommendations presented by CONCUR, ALFA supports the following changes to the Conference Board process:

- Clearly define criteria for representation on the Conference Board. Establish a pre-meeting procedure for group application to participate on the Conference Board. Post list of participants by a date certain with a minimal comment period to contest/confirm representation. No new groups added at the meeting.
- Hire staff to take notes during the Conference Board and PAG meeting. Notes should include the motion, the vote, and a summary of comments supporting and opposing a decision.
- Relative to voting – Allow representative from countries/groups flexibility when deciding whether to vote on an issue. At times groups decide not to vote because all the nuances of an issue are unclear; this makes sense. When the US and Canada disagree, that disagreement

should be communicated to the Commissioners. Likewise when both countries agree on an issue, that agreement sends a strong statement to the Commissioners.

- Creating separate commercial, charter, sport or tribal /subsistence advisory boards would further polarize issues and minimize opportunities to identify common ground.

Recommendation #4: Develop Strategic Approach to Research

ALFA supports wider engagement of stakeholders in establishing research priorities, evaluating results, and identifying future research needs. Many commercial harvesters are on the water almost year-round and have a broad and unique perspective on resource trends and issues. The process for identifying and selecting members of the Research Advisory Board should be clarified and made transparent.

Recommendation #5, #8 and 11: Strengthen Stock Assessment Model/Delineate Scientific Analysis from Policy; Strengthen Meeting Process

ALFA agrees that the IPHC stock assessment process and model would benefit from regular peer review. We are concerned by the retrospective bias in the model and urge thorough evaluation. While we accept the coast-wide model, we believe additional evaluation of migration and its role in stock distribution requires additional evaluation.

ALFA STRONGLY believes that proposed changes to the stock assessment model, model assumptions or harvest policies should be identified, peer reviewed and evaluated by stakeholders prior to these changes being incorporated into catch limit recommendations. We support a process that requires proposed changes to be presented one year, evaluated over the next nine to twelve months, then incorporated in the subsequent year if adopted by the Commissioners. Alternatively, proposed changes could be identified, evaluated, and adopted or dismissed prior to becoming the basis for catch limit recommendations by adding a third meeting to the annual meeting cycle if time and resources allow.

Specific to catch limits and harvest rates, we also strongly support the CONCUR recommendation that the Staff provide the Commission a range of options with an evaluation of associated risks and benefits. Stakeholders should understand and have the opportunity to comment on the policy decisions associated with evaluating risk. In particular, our membership would like to see the risks and rebuilding scenarios associated with various harvest rates.

Recommendation #6: Expand Commission Composition

ALFA recognizes the importance of incorporating a diverse range of perspectives in Commission deliberation and decision-making. We believe this diversity could be accommodated by either increasing the number of Commissioners, although we believe adding three from each Country would be excessive, or by adding non-voting members to the Commission and allowing these members to fully participate in Commission deliberations and discussions. We believe this issue warrants additional discussion before a decision is made.

Recommendation #7: Develop Long-Term Strategic Plan

ALFA supports this recommendation but recognizes that additional resources and staff will be needed to accomplish this task. We urge both Countries to provide adequate support.

Recommendation #9: Greater Commissioner Leadership

As is identified in the report, the Commission has many strengths and an enviable reputation for maintaining the health and productivity of the halibut stocks over many decades and many changes to the resource and the industry. This expertise and accomplishment should secure the Commission standing and leadership in management forums both in Canada and the US. ALFA supports more active engagement of the Commission and the Commissioners in promoting policy that protects and strengthens the halibut resource and the halibut industry.

Recommendation #10: Tribes and First Nations

ALFA recognizes the important contribution of tribal and First Nation fishermen, scientist and managers to the IPHC process. We agree that tribal and First Nation scientists should be included in the peer review process.

Recommendation #12: Improve Communications

ALFA recognizes and applauds the efforts of IPHC staff to communicate with stakeholders through visits to coastal communities, webinars, emails and conversations during the annual meeting. We appreciate CONCURS recognition of these efforts and we highlight the importance of continuing this outreach. We urge IPHC staff to be cautious in projecting future stock levels during these visits unless able to provide specific scenarios. We support CONCUR'S recommendation for more thorough meeting summaries and recommend that these summaries provide clear rationale to support Commission decisions.

Conclusion

In closing, ALFA holds the IPHC in the highest regard and has participated in the performance review with the goal of strengthening the IPHC process and the IPHC's role in conserving and managing the halibut resource. We support many of the CONCUR recommendations and strongly disagree with only a few. We urge the Commissioners to carefully heed the response of active and long-term industry members during the evaluation of CONCUR's recommendations.

Thank you for this opportunity to comment.

Sincerely,

Linda Behnken
(Executive Director, ALFA)