



June 29, 2012

Dr. Jim Balsiger, Chairman
International Pacific Halibut Commission
2320 W. Commodore Way Suite 300
Seattle, Washington 98199-1287

Re: Comments on Performance Review by Concur Inc.

Dear Dr. Balsiger:

I am writing on behalf of the At-Sea Processors Association (APA) to comment on the above-referenced Performance Review of the International Pacific Halibut Commission (IPHC), which was prepared under the direction of the US Department of State (DOS), and the IPHC by Concur Inc. and released to the public on April 30, 2012 (the "Concur Report").

As you know, the APA is a trade organization that represents a number of companies that own and operate catcher processor vessels that engage in the Bering Sea groundfish fisheries. Our primary target fishery is pollock--a fishery with relatively low amounts of halibut bycatch. We have been participating as "stakeholders" in the Performance Review process; and we thank the DOS and the IPHC for the opportunity to present our views on the Concur Report.

First, we would like to compliment Concur Inc. on a well-written and thorough report. We take little issue with the contents and generally agree with the findings and recommendations that Concur has made to help bring the IPHC into compliance with the "best practices" standards currently expected of world-class fishery management organizations.

Second, with regard to the findings of the Concur Report re the need to provide better access and balance insofar as stakeholder participation in the Conference Board and on the Processor Advisory Group is concerned, we



JUNEAU
P.O. Box 32817
Juneau, AK 99803
Tel: (907) 523-0970
Fax: (907) 523-0798

SEATTLE
4039 21st Avenue W., Suite 400
Seattle, WA 98199
Tel: (206) 285-5139
Fax: (206) 285-1841

WASHINGTON, DC
1225 I Street NW, Suite 600
Washington, DC 20005
Tel: (202) 712-9119
Fax: (202) 789-1116

would recommend a single, integrated constituent advisory body similar to the North Pacific Fishery Management Council's Advisory Panel (AP), where virtually all interest groups are represented--fishermen, processors, NGOs, commercial and sport user groups, native organizations, etc. Seats on such an advisory group should rotate periodically as they do on the NPFMC's Advisory Panel to ensure that all constituent groups are represented over time; and all meetings of the IPHC's Advisory Panel should be open to the public with ample opportunity for public comment on each of the agenda items scheduled for discussion at the meeting in question. Given the international makeup of the IPHC "family", as well as the various fisheries, gear types and other related interest groups involved, the size of such an IPHC Advisory Panel may need to be larger than the NPFMC's AP, but it would still be smaller, more organized and easier to follow than the "closed door" meetings currently held by the IPHC's Conference Board and Processor Advisory Group. It would certainly be easier for the public to access, understand and participate in.

Third, with regard to the Report's finding that the current IPHC process lacks adequate peer review of the scientific underpinnings of the IPHC's stock assessment and harvest strategy decision making processes, we suggest the establishment of an independent standing Scientific and Statistical Committee (SSC) as utilized by the NPFMC. The Council's SSC is comprised of highly qualified social and biological scientists who review and comment on virtually all stock assessment documents, quota recommendations, and other scientific and economic analyses before they are considered by the Council. All SSC meeting are open to the public and public comments are accepted on all SSC agenda items. Such independent peer review has served the Council (and the public) quite well over the years as complicated scientific issues are well vetted as part of the process leading up to Council decision making. Here again the NPFMC's experience can be used as a time-tested model that would serve the IPHC process quite well.

Thank you again for the opportunity to present these comments and for all the thought, time and energy that went into this review. It was a worthwhile effort and the IPHC process, as well as, all of the stakeholders involved in that process will benefit from it.

If you have any questions, please feel free to give me a call.

Sincerely,
At-sea Processors Association

Stephanie Madsen
Executive Director