

Southeast Alaska Fishermen's Alliance

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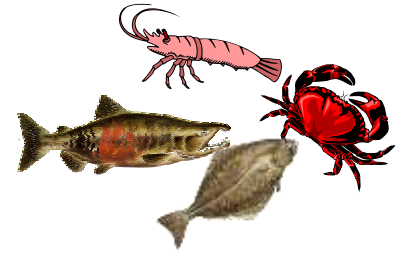
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June 29, 2012

International Pacific Halibut Commission

Bruce Leaman, Executive Director

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RE: Concur Peer Review Report

Our comments on the Concur report will focus on Section IV Recommendations and we will comment on them in the order they are listed.

Recommendation 1: Adopt Clear and Comprehensive Protocols/Rules of Procedures - SEAFA agrees that this would be helpful but a task that would need to be undertaken after decisions are made on what changes might be made due to this Peer Review.

Recommendation #2: Improve Commission Transparency - We agree with most everything written in this section but also understand that you are dealing with two countries negotiating and that some closed door sessions for the Commissioners are necessary. This will always create the illusion that the process is not as transparent as it could be but this is true within the Pacific Salmon Treaty process also. A session should be made public for whoever wishes to listen/attend anytime staff from any agency is allowed to be in the room with the Commissioners.

Recommendation #3: Revisit Stakeholder Engagement Structure - We strongly disagree with the recommendations in this section. While we do feel there are some changes that are necessary for the Conference Board in particular to function better we do not feel that a board of 24 can possibly cover all the affected user groups from processors, recreational/sport,

commercial, Country Representation, native/tribal interests, and big boat/small boat differences adequately. A small 24 member advisory panel that would be appointed tends to reflect the interests of the Commissioners that are appointed and ends up becoming political whereas the current CB and PAG by being open to any group that qualifies allows for all stakeholders/points of view to be expressed and remains open and transparent. We will lose more than we would gain by following the recommendation by Concur.

The industry advisory panel's purpose is to provide a limited number of Commissioners the broader range of interests, experience, and knowledge from industry and try to develop a consensus position where possible and the points of view for both sides when a consensus can't be reached. Participating on the Conference Board gives industry an opportunity to learn from each other as issues are discussed by the diversity of the participants. The larger CB works in that usually each decision point has a small sub-section of the CB that engages on the issue, not the full board but allows for the diversity within each sub-section position to be articulated.

Rather than the recommendations presented by Concur we feel the following changes would be appropriate for the CB.

- Set up a procedure pre-meeting for group identification by a date certain. Criteria for representation on the CB should be clearly spelled out so the co-chairs and staff can determine if a group (define group) qualifies for representation on the board. List is posted by date certain with a minimal comment period to contest a group and to allow a group to confirm that their group's request was received and recorded on the vote sheet. Groups are not added at the meeting.
- Hire staff to take notes during the CB & PAG meeting. Notes should contain not only the motion and the vote but highlights of the comments for and against an issue. It is not necessary to read every word in the notes, a summary of the motions and votes can be given to the commissioners but they should be aware through the CB notes the discussion revolving around each issue as they pursue their deliberations.
- In regards to voting - We feel that it is important and appropriate to have a vote from each country even as we understands that it takes additional time. It is important at times to allow the countries to

have different positions, there are times when you don't want to weigh in on a proposal for the other country (or even IPHC regulatory area) because you are not aware of all the nuances to the issue, it is best to abstain or there are differences of opinion based on Country voting blocks and the Commissioner should have an opportunity to hear each Countries opinion. The other reason voting by Country is important because a Countries voice should not be outvoted by having more participants from one country or the other. On the other hand when both countries voting block's agree on an issue it is a strong statement to the Commissioners.

- In the future, it might evolve to where it would be appropriate for a third recreational advisory board to be established. We are not at that point yet and might never be.

Recommendation #4: Develop Strategic Approach to Research - We agree with this recommendation but also would clarify the understanding that while you are operating under a 5 year strategic plan that is reviewed and updated every year.

Recommendation #5: Strengthen Stock Assessment Process - Again we agree with this recommendation particularly the sub-recommendation (2) to develop and articulate an agreed upon process for considering proposed changes to the assessment model and apportionment.

Recommendation #6: Expand Commission Composition - SEAFAs agrees with some of the individual recommendations in this section while disagreeing with restructuring the Commission by adding alternates and additional seats. We agree that timely appointment when a Commissioners term is ended is important as well as continuity in Commission appointments.

Recommendation #7: Build Long-Term Strategic Plan - SEAFAs agrees that a strategic plan can be helpful but it also takes a lot of time to develop and begin the strategic planning process, taking additional time away from other important tasks.

Recommendation #8: Structure Staff Advice to Strengthen the Delineation Between Scientific Analysis and Policy Options - SEAFAs has no comment on this recommendation.

Recommendation #9: Commissioners Should Seek and Take Advantage of Opportunities to Model and Exert Leadership - SEAFA has no comment on this recommendation.

Recommendation #10: Elevate the Importance of Tribes and First Nations - One of the advantages of the Conference Board is the Tribes and First Nations do participate in the process and bring information from their scientists. The tribal scientists have been attending the Commissioners closed meetings with other agency personnel so their actual participation in that process is unknown. They have the right to participate; SEAFA would not like to see designated seats/positions for tribes that are not then filled on advisory panels or commissioners seats.

Recommendation #11: Strengthen Interim and Annual Meeting Process - SEAFA agrees with the Concur report that the annual meeting does not have sufficient time particularly for interaction with the Commissioners and public question/comment time after staff presentations.

Recommendation #12: Improve Communications - SEAFA supports the rationale in this section but has no comment on the specific sub-recommendations.

We have one last comment, the choice of interviewees tended to lead the Concur team to many of their conclusions and recommendations particularly for an integrated smaller advisory panel. Very few of the interviewees have actually sat on and participated in the CB/PAG process. For example, of the 2 Alaskan recreational interviewees, one attended their first meeting while being interviewed (didn't participate in the CB - sat in the Commissioners/Agency room) and we have never seen the second recreational interviewee to attend an IPHC meeting, yet there are Alaskan recreational representatives that have attended every year for years as a member of the CB - they weren't interviewed and might have provided a completely different perspective. Again 3 of the 48 interviewees were from the trawl fishery, a sector that usually doesn't participate in the IPHC process, (just started attending last year) yet they are more than welcome to apply for and sit on the conference board, they have chosen to not take advantage of the opportunity. Between IPHC staff (5), Governmental

representatives (7), Commissioners (8 - past & present) and 3 academic representatives accounted for over 50% of the interviews.

Please do not make major changes to the advisory panels without consultation with the industry and members who actually participate in the process. There are changes that can be made to improve the process as mentioned above. We would be willing to work with staff, commissioners, or a working group on ideas to improve the CB process without changing the most important aspect of the advisory panel which is the ability to have open representation not political appointments.

Sincerely,

Kathy Hansen
Executive Director