Stakeholder comments on IPHC Fishery Regulations or published regulatory proposals

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PURPOSE

To provide the Commission with a consolidated document containing comments from stakeholders on IPHC Fishery Regulations or published regulatory proposals submitted to the Commission for its consideration at the 101st Session of the IPHC Annual Meeting (AM101).

BACKGROUND

The IPHC Secretariat has continued to make improvements to the Fishery Regulations portal on the IPHC website, which includes instructions for stakeholders to submit comments to the Commission for its consideration. Specifically:

> "*Informal statements or comments on IPHC Fishery Regulations or published regulatory proposals can be submitted using the form below up until the day before the IPHC Session. Submitted comments will be collated into a single document and provided to the Commissioners at the IPHC Session.*"

Comments may be submitted using the IPHC Stakeholder Comment Form.

DISCUSSION

Table 1 provides a list of the stakeholder comments which are provided in full in the Appendices. The IPHC Secretariat does not provide commentary on the statements, but simply collates them in this document for the Commission's consideration.

Table 1. Statements from stakeholders received by noon on 13 December 2024.

Appendix No.	Title and author	Date received
Appendix I	James Kearns, Halibut Forever	24 October 2024
Appendix II	Buck Laukitis, commercial fisher	27 December 2024

RECOMMENDATION

That the Commission:

1) **NOTE** paper IPHC-2025-AM101-INF01 Rev_1 that provides the Commission with a consolidated list of comments from stakeholders on IPHC Fishery Regulations or published regulatory proposals submitted to the Commission for its consideration at the 101st Session of the IPHC Annual Meeting (AM101).

APPENDICES

As listed in Table 1.

APPENDIX I

Statement by James Kearns (Halibut Forever)

Section of IPHC Fishery Regulations or regulatory proposal reference the comment will refer to	Section 28: Recreational (Sport) Fishing for Pacific Halibut—IPHC Regulatory Areas 2C, 3A, 3B, 4A, 4B, 4C, 4D, 4E
Submitted comment	There are three kinds of halibut fishermen: 1 commercial, 2 recreational, 3 subsistence. Commercial fishermen do it to make a living by selling their catch. Recreational fishermen do it for fun, for entertainment, and to enjoy some of the bounty of the sea. Subsistence fishermen do it to feed their families Because of the different reasons that these 3 groups fish for halibut, I encourage this body to set three different allocations for the halibut resource, one for each group. A commercial allocation (currently the only one); a recreational allocation that includes all recreational fishermen (both guided and unguided recreational halibut anglers); and a subsistence allocation that provides for those who depend on halibut to feed their families. I propose that you determine the percentage of the annual TCEY that should be allocated to each of those three groups and manage the halibut fishery within those allocations. Further I propose that the recreational only allocation be set at the average of the last 24 years combined guided/unguided halibut removals for each area. Then manage the recreational fishery for each area within that allocation with a 1 fish of any size daily bag limit (to help reduce handling mortality), an annual limit, and a requirement that any recreational halibut kept that is 60 inches or greater in length be counted as two fish on the fishermen's annual limit. Additionally, provide that the RQE stamp be required for every recreational halibut fisherman and that it be used as a monitoring mechanism with a requirement to fill in the size, gender, and location of every halibut kept. That means that the RQE stamp fee would be based annually on the annual limit. And since it will most likely be a $20 per day flat fee-it would be one stamp per fish and the stamp would have to be turned in when used or by Dec 1 of each year. This proposal will give an accurate accounting of annual recreational halibut removals. It will give size, gender, and location data for halibut abundance studies. It will treat all recreational halibut fishermen equally and fairly-the old idea of "same license same rules" unless there is a resident/nonresident application. It will support the RQE concept of no uncompensated re-allocation of the resource. It will not promote killing the larger fecund halibut. It will simplify enforcement.

And it will totally solve the concerns of the expanding removals for the rental unguided recreational halibut fishery.

And finally, while it is true that resident Alaskan unguided halibut fishermen will have to also abide an annual limit, it is imperative that all recreational halibut fishermen participate in helping maintain the resource. I am an Alaskan resident and I eat a lot of halibut, but I can certainly get enough halibut to enjoy eating within an annual limit. And if an Alaskan resident lives in a rural area or is an indigenous Alaskan who relies on wild meat resources to provide for their family, they would be eligible for a subsistence permit and be able to harvest under the subsistence allocation.

Now there may be some who are still concerned about the charter boat operators who make a living by taking recreational halibut fishermen out to the fishing areas. The whole guided vs unguided issue came about trying to control the increasing fleet of such operators and the resulting increase of recreational halibut removals. Because of the commercial nature of the business (taking money in trade for services), those operators were put into a catch sharing plan with commercial fishermen. Most of you know that I have always felt like that was inappropriate because the charter boat operators were not paid by the pound of fish taken, but rather by the number of persons who paid for their Coast Guard licensed expertise to safely pilot a charter vessel. Definitely not commercial fishing.

But that has already been managed by limiting the entry into that occupation, the CHP program.

I propose that the IPHC recommend to the NPFMC that Alaska halibut fishermen be given an allocation that is not a CSP (Catch Sharing Program) with the commercial sector. I further propose that you recommend that all recreational halibut anglers who fish in Alaska participate in maintaining a healthy halibut stock by establishing a daily bag limit of just 1 halibut of any size with an annual limit that will keep the recreational removals within their allocation. Additionally, that any halibut retained that is 60 inches or more in length be counted as 2 fish on the angler's annual limit.

APPENDIX II

Statement by Buck Laukitis (commercial fisher)

Section of IPHC Fishery Regulations or regulatory proposal reference the comment will refer to	NA
Submitted comment	**Proposal for Implementing a Risk-Averse Model for Pacific Halibut Stock Assessment** Title: Enhancing Pacific Halibut Management with a Risk-Averse Stock Assessment Model Introduction: The International Pacific Halibut Commission (IPHC) currently employs an ensemble model for assessing the stock of Pacific halibut across its extensive range. While this approach has served to integrate various sources of uncertainty, there are concerns that current risk assessments might underestimate conservation challenges. This proposal suggests the development and implementation of a supplementary, risk-

averse model to coexist with the existing assessment framework, offering a more precautionary perspective to guide management decisions.

Rationale for Risk-Averse Modeling:

- Conservation Over Economic Yield: With the Pacific halibut facing pressures from climate change, habitat alteration, and potentially underestimated natural threats, a risk-averse model focuses on long-term sustainability rather than short-term economic gains.
- Public Trust and Transparency: Providing an alternative, more conservative model can enhance public trust by demonstrating a commitment to precautionary management. It also offers decision-makers a spectrum of scenarios to consider, fostering more informed decision-making.

Proposed Risk Factors and Their Implications:

1. High Harvest Rate:

- Current Issue: The use of a 20% harvest rate might be too aggressive for a long-lived species like halibut, especially considering that over 80% of the commercial catch has been female for over a decade.

- Risk: This could lead to a decline in spawning biomass, as the removal of a large number of mature females might disrupt reproductive success.

- Proposal: Incorporate a model scenario where the harvest rate is reduced to 10% or less, examining the impacts on stock recovery and population structure.

2. Underestimated Natural Mortality:

- Current Issue: The natural mortality rate used in assessments might not account for significant but unmeasured factors like:

- Whale Depredation: Killer whales and other predators might be taking a larger share of halibut than currently estimated.

- Bycatch: Unreported or underestimated bycatch in other fisheries could be higher, especially in non-target fisheries like trawling.

- Habitat Loss: Fishing activities might degrade habitat, reducing juvenile survival rates and overall productivity.

- Risk: Overlooking these can lead to an overestimation of stock resilience and productivity.

- Proposal: Increase the natural mortality rate in model scenarios to reflect these potential increases, perhaps by 20-30%, to simulate these additional pressures and assess their impact on stock forecasts.

3. Poorly Understood Factors:

- Current Issue: There are likely many factors affecting halibut populations that are not well understood or quantified, such as: changes in oceanographic conditions, fecundity, maturation schedule, Russian fishery impacts, etc.

- Risk: Without accounting for these, the stock assessment might be overly optimistic about recovery and sustainability.

- Proposal: Establish a comprehensive research program focusing on:

    - Environmental impacts on halibut life stages.

    - Disease prevalence and impact.

    - Interactions with other marine species and ecosystems.

4. Recruitment and growth rates. The slow growth of halibut (compared to previous epochs) is pretty well understood, but perhaps the risks of slow growth, a minimum size limit and having a predominantly female commercial fishery vs. a predominantly u26 bycatch fishery are not well understood.

- more precaution is needed because of the lag time between spawning and maturity

5.In addition: this approach may require modeling of broad separate geographic management areas

    -separate risk adverse models for area 2, area 3 and, area 4.

Differentiation from Current IPHC Risk Assessment:

- Scope of Risk: While the IPHC's risk table considers various management scenarios and their probabilities of leading to overfishing or stock decline, this proposal expands the scope by incorporating risks that are currently less emphasized or quantified, such as those related to sex-specific harvest and natural mortality.

- Precautionary Principle: This model would be explicitly designed to prioritize conservation outcomes, potentially recommending lower catch limits or more restrictive management measures than the current ensemble model.

- This risk adverse model could be used by the public and decision makers and applied to the risk tables to show alternative probabilities of stock decline or growth.

Implementation:

- Parallel Use: Continue using the current ensemble model but introduce the risk-averse model as a parallel assessment tool during annual reviews and management meetings.

- Education and Communication: Clearly communicate to stakeholders how this model complements rather than replaces the current model, emphasizing its role in precautionary management.

- Research Investment: Allocate funds for the research program to better understand and quantify the proposed risk factors, ensuring that the model's assumptions are as robust as possible.

Conclusion:

By adopting a risk-averse model alongside the existing ensemble approach, the IPHC can provide a broader spectrum of management options that prioritize the long-term health of the Pacific halibut stock. This proposal does not seek to discount the current model but rather to enhance the management framework with a more conservative lens, ensuring sustainable fishing practices in the face of uncertainty and environmental change.

Research Proposal: Assessing the Impact of Fishing Intensity on Pacific Halibut Spawning Success in the Bering Sea

Title:

Evaluating the Effects of Year-Round Fishing on Spawning Success of Pacific Halibut in the Bering Sea

Background:

The Pacific halibut (*Hippoglossus stenolepis*) in the Bering Sea is subject to fishing pressure from various fleets under a predominantly rationalized, cooperative, year-round fishing regime. This continuous fishing intensity might disrupt the natural spawning behavior and success of halibut, potentially preventing them from schooling up in sufficient numbers to spawn effectively.

Hypothesis:

The constant fishing activity throughout the year, particularly in spawning months, does not allow Pacific halibut in the Bering Sea to aggregate in sufficient numbers for successful reproduction.

Objectives:

1. Historical Analysis of IPHC Longline Fleet Activity:

- Examine changes in the length of the fishing season over time, focusing on the intensity of fishing during the spawning months (March, November, December).

- Map and analyze where and how much harvest occurs across all months, U26 and O32.

2. Impact of NMFS Fleets on Pacific halibut:

- Assess fishing intensity by other National Marine Fisheries Service (NMFS) fleets (trawl, longline, pot) during the spawning season using observer data and other sources. U26 and O32.

- Evaluate encounter rates, assigned mortality rates, and identify areas with high CPUE (catch per unit effort) for halibut bycatch - all 12 months, U26 and O32.

3. Whale Interactions and Bycatch Mortality:

- Investigate the interaction rates between halibut and whales, especially during the spawning season, using data from both the directed halibut fleet and other NMFS fleets.

- Special emphasis should be on comparing assigned observer mortality rates at the time of release from the vessel when killer whales are in the proximity. Are viable halibut eaten by whales before they get to the bottom? Are estimated mortality values correct?

- Conduct a mark-recapture tagging study to reassess halibut bycatch mortality rates, with a focus on the catcher-processor vessels and the A80 trawl fleet's deck sorting practices.

Methods:

- Data Collection:

    - Historical Data: Compile data from IPHC on fishing seasons, areas, and harvest amounts from 1990 to present, with emphasis on spawning months.

    - Observer Data: Use NMFS observer programs data to analyze halibut bycatch in other fisheries, focusing on mortality rates, encounter rates, and CPUE.

    - Tagging Study: Implement a mark-recapture study where halibut are tagged during bycatch events, with special attention to those sorted on the deck of A80 trawlers. Monitor tag returns to estimate true survival rates post-capture.

- Analysis:

    - Spatial and Temporal Analysis: Map and analyze the spatial distribution and temporal patterns of fishing activities, correlating these with spawning grounds.

    - Bycatch and Interaction Analysis: Use statistical models to assess the relationship between fishing intensity, whale interactions, and halibut mortality.

    - Survival Rate Revision: Use mark-recapture data to revise existing estimates of halibut mortality from bycatch, considering deck sorting practices.

Expected Outcomes:

- Understanding of how extended fishing seasons impact halibut spawning aggregations.

- Quantification of the effects of bycatch and whale predation on halibut during critical spawning periods.

- Recommendations for fishery management adjustments, potentially including changes to season lengths or area restrictions to protect spawning.

Significance:

This research will provide critical insights into whether current management practices are sustainable for Pacific halibut in the Bering Sea, potentially guiding policy changes to enhance spawning success and stock recovery. It will also contribute to the broader understanding of how cooperative, rationalized fisheries can affect long-lived species.

Budget and Timeline:

- Budget: Estimated at $xxxx, covering data acquisition, tagging, analysis, and personnel.

- Timeline: 2 years - Year 1 for data collection and initial tagging; Year 2 for data analysis, fieldwork continuation, and report compilation.

Deliverables:

- A comprehensive report detailing findings and policy recommendations.

- Scientific publications on the impact of fishing regimes on halibut spawning success.

- Data sets and models that can be used for future research or management decisions.

Footnote: Please stop all cost recovery/ fund raising research projects.