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January 23, 2019

Mr. Andy Mezirow
Chair, Halibut ABM Stakeholder Committee
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252

Re: FLC BSAI Halibut ABM Proposal

Dear Chairman Mezirow:

The Freezer Longline Coalition (FLC) appreciates the opportunity to develop and submit a BSAI halibut ABM proposal for review by the Halibut ABM Stakeholder Committee (Committee). FLC's proposal is enclosed. We look forward to engaging the Committee and the NPFMC on further consideration of an ABM-based halibut management approach as this issue moves forward.

About FLC

The FLC represents the owners and operators of 23 active vessels that participate in the freezer longline sector of the Pacific cod fishery in the Bering Sea (BS) and Aleutian Islands (AI). FLC member vessels range in size from approximately 110 to 191 feet. The mission of the FLC is to promote public policy that facilitates the sustainable and orderly harvest of Pacific cod and other groundfish species. All members of the FLC who participate in the BSAI Pacific cod fisheries are also members of the Freezer Longline Conservation Cooperative (FLCC), a voluntary cooperative established in 2010. FLCC sustainably manages the quota allocated by the NPFMC to the freezer longline sector of the BS and AI Pacific cod fisheries. FLCC and its members work collaboratively with NMFS to ensure the efficient and responsible harvest of the Pacific cod quota allocated to the sector, including maximizing optimum yield in the fishery and minimizing bycatch of other species. Since its establishment, FLCC has been a leader in efforts to reduce bycatch and promote more sustainable fishing practices in the BSAI.

FLC ABM proposal

The enclosed ABM proposal offers a reasoned approach to abundance-based management of halibut bycatch by the freezer longline fleet. The proposal is responsive to each of the objectives identified by the NPFMC for an ABM program and provides specific rationale on key decision points in the development of the proposal. Analysis is needed to confirm the merits of the proposal, but we believe this approach will, to the degree that our sector impacts halibut stock biomass, further protect the stock while avoiding unnecessary constraints on our fishery. This proposal warrants inclusion in any further consideration of an ABM program to be adopted by the NPFMC.

FLC efforts on halibut bycatch

The FLC and its members take seriously our responsibility to be stewards of the environment and the resources that inhabit the waters we fish. Our members are Alaskans and Washingtonians

who have spent their careers living and working in Alaskan communities. We understand the reliance of Western Alaskan communities on the Bering Sea and share an interest in sustaining its resources for all of us to continue to harvest now and in future generations. This proposal is consistent with this interest.

Halibut bycatch reductions by FLC fleet

Actions by the FLC and our members have produced dramatic reductions in BSAI halibut mortality, with significant reductions in total mortality, discard mortality rate (DMR), and encounter rate through 2018. Below is data on halibut bycatch between 1994-2017 in the BSAI non-CDQ CP H&L sector¹. Calculations incorporating 2018 data have not been finalized, but total halibut mortality and rates by the sector declined again in 2018.

- 1994-2017: Total PSC mortality declined -81%
- 2017 mortality was -57% less than the previous 5-year average
- 1994-2017: DMR rate was reduced -48%
- 1994-2017: Encounter rate was reduced -79%
- 2017 mortality rate = 1.26 kg/mt (-53% less than the previous 5-year avg.)
- 2017 mortality rate = one 10 net lb halibut for every 5 mt p-cod
- 1994: CP H&L was 17% of all gear BSAI halibut PSC use
- 2017: CP H&L was 8.8% of all gear BSAI halibut PSC use
- 2017: CP H&L was 3.75% of total halibut removals in IPHC Area 4
- 2017: CP H&L (GOA+BSAI PSC) was 1.22% of total AK halibut removals

FLC actions to minimize bycatch

FLC members have an extensive history of voluntary actions to minimize halibut PSC mortality by our fleet. Our FLCC membership agreement includes specific language on the management of PSC catch by members, including severe penalties for exceeding limits on PSC catch established by the cooperative. These are actions that were facilitated by our own efforts to proactively address PSC mortality by our fleet. Other actions taken by FLC to minimize halibut PSC mortality include:

- *Weekly reports on halibut PSC:* Sea State provides our fleet with weekly reports, including information on halibut mortality by our boats and updates on discard mortality rates for each vessel. These reports help members to monitor halibut PSC trends and rates by season.
- *Catch data on Sea State:* Similarly, our members have access to regularly updated catch data produced on targeted and bycatch species, including halibut. This service provides members with extensive, near real-time data on their catch and enables them to map their recent activity.
- *Careful release practices:* FLC members train all crew on careful release practices. Crew are taught the best methods for handling PSC species to enable them to return to the sea minimally affected by their encounter with our boats.
- *Annual meeting for crew officers:* FLC hosts an annual symposium for officers and crew to give them an opportunity to hear reports from NMFS officials and other partners about developments impacting their operations. These events help keep our officers and crew current on management and regulatory actions in the fishery and helps inform other symposium participants about what's happening on the water.
- *100% observer coverage, plus scales:* The FLC collaborated with NMFS to institute 100% observer coverage on our entire fleet. Members were required to accept observer coverage on their vessels as a component of membership in the FLCC. More recently,

¹ Figures based on NMFS reporting data.

our entire active fleet added flow scales as a means of further monitoring our catch. The addition of scales required nearly \$100,000 of new equipment on each vessel.

- *FLC Halibut Bycatch Committee:* The FLC maintains a Halibut Bycatch Committee for members to convene to review halibut PSC figures for our fleet and address any concerns that emerge related to our catch. This committee facilitates additional discussion on halibut PSC catch within our membership and encourages further efforts by members to carefully monitor and reduce their bycatch.
- *Innovation:* FLC members are constantly working with partners to develop and apply new equipment designs and technologies to operations on their vessels, including measures to reduce bycatch. An example is the adoption of new hook designs that have allowed many vessels to reduce their halibut bycatch, contributing to lower rates across the fleet.

Thank you for your consideration.

Sincerely,



Chad I. See
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Enc: FLC BSAI Halibut ABM Proposal