



# Pacific Halibut Management Association of British Columbia

*A MEMBER OF THE BC SEAFOOD ALLIANCE*

March 26, 2007

Chet Chaffee  
Scientific Certification Systems, Inc.  
2200 Powell Street, Suite 725  
Emeryville, CA 94608

Dear Mr. Chaffee:

## **EVALUATION OF CANADA'S PACIFIC WILD HALIBUT FISHERY UNDER THE PRINCIPLES AND CRITERIA OF THE MARINE STEWARDSHIP COUNCIL**

The attached documents constitute the submission to the MSC evaluation team by the Pacific Halibut Management Association (PHMA) for the evaluation of Canada's Pacific Wild Halibut Fishery.

Our submission for Principle 1 stock assessment is the same as the Alaskan submission. The documents listed below accordingly relate to Principles 2 and 3.

- The technical submission of Fisheries and Oceans Canada (DFO) on the indicators for the Pacific Wild Halibut Fishery for Principles 2 and 3.
- The responses of DFO to questions about Canada's Pacific Wild Halibut Fishery posed by Scientific Certification Systems, Inc (SCS).
- The DFO Conditions Of 2006/2007 Halibut Licence.
- DFO data on catches in the 2006 Canadian Pacific Wild Halibut Fishery.
- The responses of PHMA to questions about Canada's Pacific Wild Halibut Fishery posed by SCS.
- A literature review prepared by Robert J. Trumble, Ph.D. (MRAG Americas) providing citations relevant to the Pacific halibut performance indicators and scoring guideposts.
- a PHMA submission that includes:
  - a description of how DFO develops the harvest strategy based on the level set by the International Pacific Halibut Commission (IPHC);
  - PHMA comments on the DFO technical submission on the indicators for the Pacific Wild Halibut Fishery for Principles 2 and 3.

March 21, 2007

If you have any questions or require additional information, please contact me. Once you satisfied that this submission is complete, PHMA authorizes you to post any or all of the documents on the MSC website and let stakeholders know their availability.

We look forward to moving ahead with the MSC certification of Canada's Pacific Wild Halibut Fishery.

Sincerely,

A handwritten signature in dark ink, reading "Christina BurrIDGE". The signature is written in a cursive style with a prominent "C" and a stylized "B".

Christina BurrIDGE for  
George H. Cormier  
Executive Manager

## PHMA SUBMISSION

### Principle 1

With respect to Principle 1, the PHMA believes the *MSC Assessment Final Report – The United States North Pacific Halibut Fishery* adequately covers halibut stock assessment issues for Canada's Pacific Wild Halibut Fishery and accordingly we ask the team to review the relevant parts of this document as part of their assessment.

### Principles 2 and 3

For the most part the PHMA is in agreement with the DFO technical submission on the indicators for the Pacific Wild Halibut Fishery for Principles 2 and 3; however, we would like to raise some additional points. Specifically:

*Indicator 2.1.1.2. Information is available on non-target species affected by the fishery.*

The PHMA notes that the *MSC Assessment Final Report – The United States North Pacific Halibut Fishery* states, "Because the fishery is carried out by longline and trawling for halibut is not permitted, the direct physical impact of the fishing method on biota is small, although occasionally longlines may snag corals." Given the similarities with the United States North Pacific Halibut Fishery such statements should also apply to Canada's Pacific Halibut Fishery.

With respect to seabird avoidance techniques and devices, it is worthy to note that these measures were introduced into Canada's Pacific Halibut Fishery a relatively short time ago and it is anticipated that over time fishermen will learn how to use these devices and techniques more effectively and compliance will improve. In addition, the PHMA continues to monitor the progress in other jurisdictions (e.g., Alaska, Australia) on seabird bycatch avoidance and mitigation.

*Indicator 2.1.4.2. Management objectives are set in terms of impact identification and avoidance/reduction.*

The PHMA notes that the *MSC Assessment Final Report – The United States North Pacific Halibut Fishery* states, "The fact that halibut cannot be harvested by trawl fishing represents one strategy to restrain impacts on the ecosystem, since longline fishing has considerably less impact on benthic ecosystems than bottom trawling (Jennings et.al 2001)." Given the similarities with the United States North Pacific Halibut Fishery such statements should also apply to Canada's Pacific Halibut Fishery.

*Indicator 2.1.5.1. All the significant effects of the fishery on the ecosystem have been identified.*

In addition to the DFO response, the PHMA would like to add that the licence holders in Canada's Pacific Halibut Fishery also contribute to ecosystem-based science, funding various rockfish assessment initiatives (\$485,000 in 2006). These initiatives will aid in a better understanding of the status of various rockfish stocks as well as the impacts of fishing.

*Indicator 3.1.1.5. There is an adequately funded research strategy to support the harvest strategy and to address information needed to support the identification and mitigation of ecosystem impacts.*  
*[Relates to MSC Criterion 3. 8]*

In addition to the DFO response, the PHMA would like to add that the licence holders in Canada's Pacific Halibut Fishery also contribute to ecosystem-based science, funding various rockfish assessment initiatives (\$485,000 in 2006). These initiatives will aid in a better understanding of ecosystem impacts.

Although the process by which DFO develops a harvest strategy based on the target levels set by the IPHC is covered under the DFO technical submission for Principle 3, the PHMA would also like to emphasize the following points from the DFO document:

- By international convention, the IPHC performs assessments and basic research on the Pacific halibut stocks, sets total allowable catches (TACs) by fishing area, and determines regulatory measures almost exclusively related to conservation issues (Casey et al., 1995).
- Canada has responsibility for domestic issues, such as allocations between national user groups and management and regulatory measures regarding the conduct of fishing and enforcement. Representatives from the Government of Canada participate in the IPHC process, with an awareness of how measures proposed by the IPHC would fit in with the overall management approaches in their own country.
- First Nations opportunities to fish for food, social and ceremonial purposes have first priority after conservation and are provided through issuance of communal licences. In Canada, First Nations rights to fish for food, social and ceremonial purposes are constitutionally protected in Section 35 of the *Constitution Act, 1867* (DFO, 1998). DFO currently allocates 300,000 pounds of halibut for First Nations food, social and ceremonial purposes.
- After taking into account allocations for First Nations' food, social and ceremonial purposes, the remaining allowable harvest is divided between the commercial (88%) and recreational fishing sector (12%).
- DFO conducts ongoing, bilateral consultations with First Nations tribal councils and individual bands on the management of the halibut resource. DFO continually seeks and accepts advice from all stakeholders regarding the management of the fishery through the Halibut Advisory Board (HAB). HAB provides wide ranging advice to the Department to assist in the overall planning, management and enforcement of the halibut fishery. HAB meets 4-5 times a year; meetings are open to the public and minutes of all meetings are posted on the DFO Consultation website. DFO consults with the recreational fishery on halibut issues through the Sport Fishing Advisory Board (SFAB), the DFO advisory body for the recreational fishery.
- As outlined in the HAB terms of reference, HAB advisors include elected halibut vessel owner representatives and DFO appointed representatives to represent native, union, processing, recreational fishing, Provincial Government, IPHC, and other interests.
- The commercial hook & line fishery for halibut is based on individual accountability. Commercial halibut vessels must stop fishing when catch limits of either directed or non-directed species are reached. This ensures overall harvests stay within allowable levels.