29th April 2011

Alaska Pacific Halibut Commercial Fishery Certification

Certification Recommendation

A positive Certification determination has been awarded for the US *Alaska Pacific Halibut Commercial Fishery* against the United Nations, Food and Agriculture Organization (FAO) based Responsible Fisheries Management (RFM) criteria, by a Global Trust Certification Committee on April 29th 2011, after a twelve months independent assessment of the Alaska Pacific halibut commercial fishery. The assessment was performed at the request of Alaska Seafood Marketing Institute (ASMI).

The Certification covers the Alaska Pacific halibut (*Hippoglossus stenolepis*) commercial fishery, fished with benthic longline within the International Pacific Halibut Commission (IPHC)'s Regulatory Areas 2C, 3A, 3B, 4A, 4B, and 4CDE, on American jurisdiction off Alaska (200 nautical miles EEZ), under international (IPHC), federal [National Marine Fisheries Service (NMFS)/North Pacific Fishery Management Council (NPFMC)] and state [Alaska Department of Fish and Game (ADFG)] management.

A Global Trust Certification Committee, composed of fishery, certification and accreditation experts, was tasked with a qualitative review of the formal processes, assessment reports and recommendations provided by the fishery Assessment Team and Peer Reviewers appointed to assess this fishery.

The Certification Committee unanimously agreed with the Assessment Team's findings that the applicant Alaska Pacific halibut commercial fishery is responsibly managed by effective management institutions, using robust fishery management plans based on good science.

The resulting certification communication for the Alaska Pacific halibut commercial fishery is 'Certified Responsible Fisheries Management'.

This Certification delivers high confidence that reliable management systems are in place to properly assess and respond to any current and evolving issues and allow the fishery to continue on the path of sustainable and responsible management. These management systems are certified as being in line with those recommended by the FAO Code of Conduct for Responsible Fisheries (1995).

This Certification demonstrates responsible management for the sustainable use of the fisheries and is a realistic and tangible communication for this standard and process. The Certification lasts for five years and it involves annual surveillance assessments of the fisheries. This Certification means that the Alaska Pacific halibut commercial fishery has met the criteria for certification of responsibly managed fisheries at the point in time of the assessment. This certification does not certify that the fisheries will remain responsibly managed in the future. Thus the reason there are annual surveillance assessments and a full re-assessment every 5 years.

The Alaska Pacific halibut commercial fishery achieved high conformity against almost all FAO RFM Conformance Criteria. Clause 4.2 however, achieved a medium rating as the directed Pacific halibut commercial longline fishery does not have observer coverage at present.

There is substantial evidence available that describes the on-going activities and plans that are under way to include observer coverage in the halibut fishery. The consequences of observer coverage relate to the accuracy of the current bycatch estimates in the halibut fishery. These mainly include species such as Pacific cod, rockfish, spiny dogfish, sleeper shark, salmon shark and skates.

The Assessment Team findings were supported by evidence from the various management organizations (IPHC, NOAA NMFS, NPFMC) and outcomes of NPFMC Scientific Committee and Advisory Panel discussion documents. Various options have been investigated and debated. These include the use of on vessel video cameras, a possible solution to the difficulties of accommodating observers on relatively small longline crafts used in the halibut fishery. Based on this information and through direct consultation and witnessing of NPFMC meetings, the Assessment Team were confident that management entities were following a responsible course with respect to fishery improvements.

The separate peer review evaluations also supported a positive decision for certification. A vast amount of information has been collated and recorded regarding the applicant fishery, all of which were considered in the assessment. The assessment findings have been summarized in a 250 page Full Assessment and Certification Report.

The assessment process has layers of governance and transparency. The assessment was conducted by Global Trust Certification according to (International Standards Organizations) ISO 65 procedures for FAO-based Responsible Fisheries Management Certification. ISO 65 is the international accreditation criteria for bodies offering product and process certification. The ISO 65 assessment, certification and decision process is governed by the accreditation bodies of the International Accreditation Forum (IAF). Global Trust Certification is accredited by IAF through the Irish National Accreditation Board (INAB).

The established FAO Criteria for the fishery assessment were based on key standard documents. These documents included the FAO-based Responsible Fisheries Management Conformance Criteria (Version 1, July 2010), as derived from FAO Code of Conduct for Responsible Fisheries (1995), and the minimum criteria set out for marine fisheries in the FAO Guidelines for the Eco-Labeling of Fish and Fishery Products from Marine Capture Fisheries (2005/2009).

Certification for the Alaska Pacific halibut commercial fishery is for a 5-year period after which the fishery will re-enter full assessment. In the intervening years, the fisheries will be subject to annual surveillance assessments to confirm that the fishery continues to meet the requirements for certification. The Full Assessment and Certification report (250 pages) will be available for download at Global Trust and ASMI's websites beginning June 1st, 2011.

Go to: www.GTCERT.com and/or http://sustainability.alaskaseafood.org/halibut-certification

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Summary of the Process

ASMI, on behalf of Alaska Pacific halibut commercial fishery, submitted an application to Global Trust Certification for a formal assessment of the Alaska Pacific halibut commercial fishery to the requirements of the FAO-Based Responsible Fisheries Management (RFM) Certification Program. The Application was made in April 2010 (Table 1).

After an initial Validation Assessment (Table 2) was completed by Global Trust in October 2010, an expert Assessment Team was formed to undertake the full assessment. The five person team was composed of independent assessors (Table 3) with expert competency in fishery science, the Pacific halibut fishery, the Alaska management system and the FAO RFM assessment criteria.

The Assessment Team's report was peer-reviewed by two additional independent experts (Table 4) before being submitted to a formal four-person, independent Global Trust Certification Committee (Table 5) for an independent certification decision.

Key factors and issues evaluated, documented and judged by the Assessment Team included:

A. The Fisheries Management System

The Alaska Pacific halibut commercial fishery has a structured and legally mandated international (IPHC), federal (NMFS/NPFMC) and state (ADFG) management regime. The management system is based upon and respects international, national fishery laws. Amendments in the IPHC Treaties of 1930 and 1937 authorized the division of the coast into areas and the limitation of the halibut catch in each of US and Canada's Regulatory Areas. The IPHC performs stock assessment and halibut biology research as well as apportioning catch limits among Regulatory Areas.

The NPFMC's Amendment 15 and 20 to the Groundfish Fishery Management Plan (FMP) established Individual Fishing Quotas (IFQ) and Community Development Quotas (CDQ) system for the Alaska halibut and sablefish fishery. The NPFMC recommends and implements regulations (i.e. IFQ, CDQ) to govern the directed Alaska halibut fisheries and makes allocation decisions among commercial (and incidental), sport, and subsistence halibut users and user groups fishing off Alaska. NMFS performs scientific research (groundfish trawl surveys, marine mammals and habitat conservation) and is responsible for developing, implementing and enforcing regulations in US waters. ADFG licenses sport fishing, monitors and reports on sport and subsistence halibut harvests.

The Alaska Coastal Management Plan (ACMP) and National Environmental Protection Act (NEPA) process includes all activities, developments and stakeholders which exist and utilize the coastal resources of Alaska. All NPFMC fisheries-related packages go through full NEPA review. Conflict avoidance and resolution is dealt through NPFMC, IPHC and Board of Fisheries meetings. The IFQ System and the NMFS' Restricted Access Management entry program control commercial capacity. Monitoring of the Alaska coastal environment from a social, economic and environmental perspective is carried out by a large number of state, federal and international bodies.

B. Science and Stock Assessment Activities

The IPHC and related managing organization collect and analyze effective fishery data (dependent and independent) systems for Pacific halibut stock management purposes. The annual IPHC Pacific halibut stock assessment uses data from commercial landing reports (fish tickets), commercial logbooks, port sampling (size and age) of commercial landings, IPHC setline surveys (halibut surveys with juvenile/adult and non-halibut bycatch estimation as well as birds monitoring), and fishery agencies in both countries that report estimates of halibut (i.e. NMFS' Observer Program Groundfish Fisheries) and non-halibut bycatch (i.e. NMFS Trawl Surveys, IPHC stock assessment surveys), sport catch (i.e. NMFS logbooks & ADFG Surveys), and subsistence catch (i.e. NMFS SHARC permits).

Data on commercial catches, and on size-at-age, are the foundation of the IPHC coastwide age-structured stock assessment model. Constant Harvest Rate policy since the 1980's is set to "harvest 20% of coastwide exploitable biomass (adult males and females) when spawning biomass (adult females) are estimated above 30% of the unfished level. The harvest rate is linearly decreased towards zero as the spawning biomass approaches 20% of the unfished level. IPHC is aware of the decreasing trend in size at age of the Pacific halibut stock. Nonetheless, halibut total biomass is increasing. Interspecific competition with other flatfish is thought as the most likely cause for the decrease in size at age.

The 2011 IPHC standardized setline stock assessment survey will cover 28 regions, from southern Oregon to the Bering Sea, Aleutian Islands and Puget Sound. IPHC also participates in the NMFS annual Bering Sea shelf trawl survey since 1998. IPHC has a Seattle staff of 27 including a fisheries statistics program manager, quantitative scientists, data transcribers, biologists, port & sea samplers, survey managers and operators etc… yearly producing Pacific halibut stock assessment surveys.

The halibut fleet has currently no directed observer coverage. Nonetheless, NMFS and NPFMC are in the process of restructuring the Groundfish Observer Program to include the halibut fleet and improve halibut and non halibut bycatch estimates. The new observer program may employ Electronic Monitoring (EM) technology in halibut vessels shorter than 60 feet. The program is estimated to be up and running by 2013.

C. The Precautionary Approach

The lowest spawning biomasses (able to produce strong year classes) for the three IPHC core areas all occurred in mid 1970s at approximately 9 million pounds in Area 2B, 13 million pounds in Area 2C and 42 million pounds in Area 3A. By definition, these become the spawning biomass limits reference points. The combination of harvest rate and precautionary levels of biomass protection have, in simulation model studies, provided a large fraction of maximum available yield minimizing risk to the spawning biomass, while allowing for the quickest stock recovery to at least, threshold levels (female spawning biomass at 30% of unfished levels).

A newly adopted (January 2011) Slow Up-Full Down (SUFullD) policy allows for 33% increase and 100% decrease in Catch Limit difference from one year to the following, depending on biomass

projections, ultimately aiming at increasing Pacific halibut biomass. The 2011 female spawning biomass value of 350 million pounds established their current biomass as 43% of unfished levels, up from a 2010 beginning of year 38% estimate. Catch limits adopted for 2011 were lower in the central regions of the stock (Areas 2C and 3) but significant recent reductions in catch limits for Areas 2A and 2B appear to have resulted in improvements to stock condition in those areas.

The halibut fleet is highly regulated and subjected to defined fishery data collection systems, operating under an IFQ system, with conservatively defined catch quotas, gear restrictions, size limits, and closed seasons and areas. In addition, if halibut bycatch limits (Prohibited Species Catch) are reached in the groundfish fisheries, or if areas with if high concentrations of halibut juveniles are recorded, fishery and area closure measures are adopted respectively.

D. Management Measures

The IPHC recognizes that US agencies wish to adhere to domestic allocation limits but effective controls remain to be implemented through a Catch Sharing Plan in 2012 for the sport and commercial Pacific halibut fishery. For the sport fishery IPHC recommends continuation of a one-fish daily bag limit with an additional restriction that the retained fish must be no smaller than 37 inches. IPHC strives for improving annual stock assessment and quota recommendations, developing information on current management issues, and adding to knowledge of the biology and life history of halibut. Management actions are in place to increase knowledge of bycatch dynamics in the directed halibut longline fishery (i.e. restructuring the groundfish observer program, implementation of EM technology and related bycatch implications).

In terms of technical measures, scarelines, night setting, lineshooters and lining tubes are used to avoid diving birds, and circle hooks are compulsory for safe release of bycatch or juvenile halibut. Also, the Alaska Longline Fishermen's Association has secured funding to develop a real-time rockfish bycatch reporting network for the Eastern Gulf of Alaska, to decrease the bycatch of this valuable fish.

Furthermore, to address non-halibut bycatch issues in the halibut fishery, a working group composed of scientists from NMFS' Alaska Fishery Science Center (AFSC), NMFS' Alaska Regional Office (AKRO), ADFG, IPHC, and NPFMC was formed in January of 2010. The goal of this group is to investigate quantitative methods to estimate incidental catches in the unobserved halibut IFQ fishery and report its findings to the Plan Teams and NPFMC. In addition to this, the restructuring of the observer program, to provide coverage in the unobserved halibut IFQ fishery, has important implications for direct and sufficient collection of bycatch data.

The NPFMC has established Marine Protected Areas that benefit juvenile fish and adult spawners. The Halibut Longline Closure Area is 36,300 square miles in size. Additional trawl closures for areas in the waters of Bristol Bay provide some degree of refuge for juvenile halibut.
Any aspirant halibut fisherman must have 150 days of proved halibut fishing experience before being able to purchase halibut IFQs. A range of courses are available for fishermen who want to improve their fishing related skills.

E. Implementation, Monitoring and Control

Within the American EEZ off Alaska, the NMFS Office of Law Enforcement (OLE), and the U.S. Coast Guard (USCG) enforce Alaska fisheries laws and regulations, especially 50CFR679. All landings of halibut must be reported to NMFS via its mandatory "e-landings" reporting system. Commercial harvests of pollock, halibut and sablefish are the primary enforcement responsibilities of OLE. The IFQ, Observer and Record Keeping/Reporting programs are the foundations of the Alaska Division program responsibilities. There is no legal harvesting of halibut in North Pacific waters outside the national jurisdiction of the USA or Canada. Similarly, there is no halibut harvesting by American vessels in Canadian waters, or by Canadian vessels in American waters.

In any given year, OLE Agents and Officers spend an average 10,000-11,000 hours conducting patrols and investigations, and an additional 10,000-11,000 hours on outreach activities. The OLE maintains 19 patrol boats around the country to conduct a variety of boarding and patrols. Working with federally-deputized state marine enforcement agents and the U.S. Coast Guard, the OLE is able to garner even more patrol hours. The Alaska Wildlife Troopers (AWT) have increased undercover fisheries operations for sport and commercial fisheries over last 3 years. Information collection, monitoring of all logbook information and fish tickets at landing is carried out by NMFS' OLE. In addition, they inspect and cross check at landings and processors records for reconciliation, and closely monitor Prohibited Species Catch in non-halibut fisheries for halibut bycatch.

The Magnuson-Stevens Act provides four basic enforcement remedies for violations (50CFR600.740 enforcement policy; CFR means "Code of Federal Regulations"). Withdrawal or suspension of fishing authorization is among the enforcement options available. NOAA's Office of General Counsel for Enforcement and Litigation can then assess a civil penalty, or they can refer the case to the U.S. Attorney's office for criminal proceedings. For repeat violators or those whose actions have severe impacts upon the resource, criminal charges may range from severe monetary fines, boat seizures and/or imprisonment. An essential element of the enforcement effort is the public perception of a high level of patrol and enforcement, which creates the view that "It doesn't pay to cheat".

F. Serious Impacts of the Fishery on the Ecosystem

Once every five years, the North Pacific Fishery Management Council conducts a complete review of its Essential Fish Habitat (EFH) program and, on an annual basis there is a Stock Assessment and Fisheries Evaluation (SAFE) process that looks at a broad set of Ecosystem Considerations prior to the Council setting annual harvest rates and limits.

In the directed Pacific halibut longline fisheries, non-halibut bycatch is not well documented. Management actions are in place in respect to increasing knowledge on the bycatch dynamics of the IFQ halibut fleet via a restructuring of the NMFS-managed groundfish observer program.

Longline vessels are required by regulation to use seabird avoidance devices. Birds avoidance measure now include the use of streamer (tory) lines, night setting, lineshooters and lining tubes, which have been shown to reduce seabird interactions when setting or retrieving gear. The short-tailed albatross is protected in Alaska waters by the Endangered Species Act (ESA). The limit is 4

birds during each 2-year period for the BSAI and GOA hook-and-line (i.e. halibut fishery) groundfish fisheries. Since 2002 IPHC has collected seabird occurrence data on IPHC stock assessment surveys.

Yelloweye rockfish (*Sebastes ruberrimus*) are taken in the GOA halibut fishery as bycatch. The Alaska Longline Fishermen's Association has secured funding to develop a real-time rockfish bycatch reporting network for the Eastern GOA. Although marine mammals are known to interact with halibut longline gear, bycatch is virtually non-existent. Whales and otariids (sea lions and fur seals) may selectively eat hooked groundfish species such as Pacific halibut and sablefish directly from the longline gear as the line is retrieved by the vessel. A recent NMFS report on marine mammals interaction in the groundfish fisheries recounts that no Steller sea lion or other otariids were by-caught between 2000 and 2004. Also, non-harmful interactions with killer and sperm whales have been documented between 1998 and 2004 in the BSAI and GOA halibut fishery.

Through 2010, sharks were caught and managed as part of the "other species complex" in NPFMC's Groundfish Fishery Mangement Plan (FMP). Starting in 2011, sharks will be treated under a distinct "sharks complex". Spiny dogfish are by-caught in the halibut fishery and are Vulnerable to Extinction under the International Union for Conservation of Nature (IUCN) Red List. Nonetheless, the Alaska population is stable. Preliminary study results indicate dogfish status in the GOA at 80%-90% the theoretical population carrying capacity. Improvement for calculating rockfish, skates and sharks bycatch and discards estimates are being addressed through a multi-agency plan.

Benthic longline gear effect on bottom habitats is generally mild to none. In addition, halibut bait species are well managed by either the State of Alaska or NMFS, and none are classified as endangered or threatened to extinction. Several projects to obtain information about the ecosystem and status and management of Pacific halibut fisheries are being conducted.

Further Information

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Table 1: Fishery Application Summary

Applicant Contact Information			
Organization/ Company Name:	**Alaska Seafood Marketing Institute on behalf of the Alaska Pacific halibut commercial fishery**	Date:	**April 2010**
Correspondence Address:	**International Marketing Office and Administration Suite 200**		
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Nominated Deputy:	**As Above**		
Deputy Phone:	**As Above**	**Deputy E-mail Address:**	**rrice@alaskaseafood.org**

Table 2: Schedule of Key Assessment Activities

Assessment Activities	Date (s)
Application Date	April 2010
Initial Site Visit Consultation Meetings	June - July 2010
Initial Validation Assessment Report	October 2010
Appointment of Full Assessment Team	September - October 2010
On-site Witnessed Assessment and Consultation Meetings	Nov -Jan 2010
Draft Assessment Report	February - mid April 2011
External Peer Review	10th-25th April 2011
Final Assessment Report	27th April 2011
Certification Review/Decision	28th April 2011

Table 3: Global Trust Assessment Team Members

Assessor	Role	Assessor	Role
Dave Garforth, Global Trust Certification Ltd. Rivercentre, Riverlane Dundalk, Co. Louth Ireland	Assessment Leader	**Deirdre Hoare,** Global Trust Certification Ltd. Rivercentre, Riverlane Dundalk, Co. Louth, Ireland	Assessor
Stephen Grabacki, Graystar P.O. Box 100506 Anchorage, Alaska USA	Assessor	**Herman Savikko,** Douglas, Alaska USA	Assessor
Vito Ciccia Romito, Global Trust Certification Ltd. Rivercentre, Riverlane Dundalk, Co. Louth Ireland	Technical support, Information management.	**David Fluharty,** College of Ocean and Fishery Sciences University of Washington Seattle, Washington 98105 USA	Validation Report Review

Table 4: Peer Reviewers

Alan Sinclair	Earl Krygier
Alan Sinclair recently retired from a fisheries research career with Fisheries and Oceans Canada. His research included stock assessment methods and application with a recent emphasis on management strategy evaluation through feedback loop simulation and the application of the Precautionary Approach in achieving sustainable fisheries. He studied changes in fish population demographic characteristics including growth, juvenile survival, and adult natural mortality and the implications of these changes on productivity and management reference points. He investigated geologic and oceanographic factors influencing the spatial distribution of fish species, and the influence of environmental factors on recruitment. He worked with a number of national and international fisheries organizations including the Pacific Scientific Advice Review Committee (PSARC) chair of Groundfish Subcommittee; Canadian Atlantic Fisheries Advisory Committee (CAFSAC) chaired the Groundfish Subcommittee, the Statistics Sampling and Surveys Subcommittee; NAFO stock assessments and symposia; ICES annual science conferences, symposia and working groups; PICES annual science conference. He participated in fishery stock assessment meetings as reviewer and presenter in PSARC, CAFSAC, NAFO, ICES, and US National Marine Fisheries Service (NMFS) Stock Assessment Review (STAR) Panels. Alan Sinclair is currently a member of the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) where he is the co-chair of the Marine Fishes Species Specialist Subcommittee.	Earl E. Krygier gained a BSc in Science, an MSc from the Department of Fisheries and Wildlife, and completed a Ph.D Doctoral Thesis (on the role of nursery areas for juvenile english sole off Oregon) at the Oregon State University. From 1989 to 2008 he worked for ADFG's Commercial Fisheries Division as Extended Jurisdiction Program Manager with primary responsibility on state policy coordination of state, national and international marine fishery matters (research, conservation and management, and policy development), provided support for the ADFG's Commissioner in carrying out his NPFMC's responsibilities/acting as his alternate (1989-1997). Earl represented ADFG at the IPHC for 19 years, and he was state representative at the Donut Hole and the U.S./Russian ICC meetings. He sat as alternate for the Commissioner on the North Pacific Research Board (NPRB), representing ADFG on Alaska's CDQ Allocation Team; advising department staff, the Alaska BoF members, the Alaska Legislature and other state officials on NPFMC activities, proposed management plans, long-range policies and regulatory implications, or inter-jurisdictional issues arising from Council actions. Earl coordinated the State's conservation and management policy for halibut at the NPFMC, the PFMC and the IPHC, that resulted in proper halibut bycatch management; stock utilization; equitable Alaska subsistence, sport and commercial harvests; helping ensure that development of CDQs and IFQ was done in accordance with conservation & management objectives, fairly and equitably for user groups. From 2008 to present times he is the Owner/Manager of KEE Biological Consultants and served as the Marine Conservation Alliance Foundation's (MCAF) Cooperative Research Coordinator.

Table 5: Global Trust Certification Committee

Peter Marshall, Chairperson **Certification and Accreditation Expert** Global Trust Certification Ltd. Key Contact: petermarshall@gtcert.com	**Bill Paterson** **Legal / Technical / Accreditation Expert** Global Trust Certification Ltd.
Ciaran Kelly **Fishery Management Expert** Marine Institute. Ireland	**Clare Murray** **Fishery Scientist** Global Trust Certification Ltd.
Vito Ciccia Romito: Fishery Scientist / Information Management Global Trust Certification Ltd. (Fishery Presentation to Certification Committee)	