



---

## Stakeholder comments on IPHC Fishery Regulations or published regulatory proposals

PREPARED BY: IPHC SECRETARIAT (B. HUTNICZAK; 13 DECEMBER 2024)

---

### 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 101<sup>st</sup> 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
<a href="#">Appendix I</a>	James Kearns, Halibut Forever	24 October 2024

### RECOMMENDATION

That the Commission:

- 1) **NOTE** paper IPHC-2025-AM101-INF01 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 101<sup>st</sup> 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.