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**Discussion paper: Frozen-at-sea exemption for head-on requirement (Sect. 13)**

**PREPARED BY: IPHC SECRETARIAT (27 OCTOBER 2017)**

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**PURPOSE**

To discuss the exemption to the requirement to land, weight, and report all Pacific halibut with the head-on.

**BACKGROUND**

Beginning in 2017, IPHC Fishery Regulations required Pacific halibut to be landed, weighed, and reported with the head intact and entrails removed (i.e. head-on (gutted)), with an exception for Pacific halibut frozen-at-sea. The exception allows Pacific halibut frozen-at-sea to be landed head-off.

**DISCUSSION**

The IPHC Secretariat would like to discuss the exemption that allows Pacific halibut frozen at sea to be landed head-off. Removing the exemption would further improve the Pacific halibut removal estimates by removing the bias introduced from varying head cuts. In addition, it would allow biological sampling, such as total length.

While the move in 2017 to requiring Pacific halibut to be landed, weighed, and reported in the head-on condition has improved IPHC's estimate of total removals, the exemption for Pacific halibut frozen-at-sea keeps the bias introduced from varying head cuts. The IPHC studied the relationship of head-on weight to head-off weight between 2013-16 and found a range from 9-18% among different ports and IPHC Regulatory Areas (see [IPHC RARA Report 2015](#), and [2016](#)). The range comes from variations in where the head is separated from the body. Cutting larger portions of the heads than the assumed value, on average, and reporting weights after these cuts have management implications. This practice reduces the estimated net weight, potentially allowing more individual fish to be harvested within the catch limits.

To date, only Canadian vessels have landed frozen, head-off Pacific halibut in 2017, and only in Canadian ports. As of October 2017, 56 landings (70,272 net lbs; ~31.9 t) have been of frozen-at-sea head-off product from 28 vessels.

Removing the exemption would further improve the Pacific halibut removal estimates by removing the bias introduced from varying head cuts. The IPHC is seeking further discussion and feedback on whether this exemption should be maintained or removed.

**Sectors Affected:** Commercial fishery for Pacific halibut in all Regulatory Areas.

**RECOMMENDATION/S**

That the Commission:

- 1) **NOTE** paper IPHC-2018-AM094-PropA5 which proposes a discussion on retaining or removing the frozen-at-sea head-on exemption into the future.

**SUGGESTED REGULATORY LANGUAGE**

Because this is an item for discussion, there is no suggested regulatory language at this time.

**ADDITIONAL DOCUMENTATION / REFERENCES**

IPHC RARA Report, 2015. "Analysis of length-weight data from commercial sampling in 2015."  
[http://iphc.int/publications/rara/2015/RARA2015\\_09Lengthweight.pdf](http://iphc.int/publications/rara/2015/RARA2015_09Lengthweight.pdf)

IPHC RARA Report, 2016. Webster and Erikson. "Analysis of length-weight data from commercial sampling in 2016."

[http://iphc.int/publications/rara/2016/IPHC-2016-RARA-26-R-2.8\\_Analysis\\_of\\_length\\_weight\\_data.pdf](http://iphc.int/publications/rara/2016/IPHC-2016-RARA-26-R-2.8_Analysis_of_length_weight_data.pdf)

[IPHC-2017-AM093-PropA](#) , Jan 2017. IPHC Head-on Landed Weight Requirement for Commercial Fishery, including Removal of 24" Head-off Minimum Size Limit

**APPENDICES**

Nil.