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**REGULATORY PROPOSAL 2018**  
**Sport Fishing for Halibut - Cleaning Regulations**

**SUBMITTED BY:**  
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CAPTAIN/PRIVATE VESSEL OWNER  
UNITED STATES OF AMERICA  
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**EXPLANATORY MEMORANDUM**

**For IPHC Regulatory Area(s): All Regulatory Areas**

IPHC management measures Section 28. (1) (d) reads: "no person shall possess on board a vessel, including charter vessels and pleasure craft used for fishing, halibut that have been filleted, mutilated, or otherwise disfigured in any manner, except that each piece maybe cut into no more than 2 ventral pieces, 2 dorsal pieces, and 2 cheek pieces, with skin on all pieces."

Sport fisherman should be given options to this regulation. It contradicts ADF&G regulations by promoting waste and it discriminates against citizens that live on their vessels. This law assumes that all fisherman go out fishing for the day and return to port every night. Those of us that live on our vessels are not even allowed to cut off a portion of a fletch and have it for dinner unless we eat the entire fletch or throw half of it away. We cannot even buy halibut in town and take it with us on a cruising trip unless we can find someone that sells whole fletches with skin on.

I suggest the IPHC should do the right thing and remove this idiotic law from the books. Enforcement officers do not like it nor does the general public. It has been bad law from the day it was written. There are no negative aspects to eliminating this law. Please do the right thing and give private vessel owners the ability to preserve our fish properly by eliminating this law or giving us an option to it.

**SUGGESTED REGULATORY LANGUAGE**

Once again,current law reads; No person shall possess on board a vessel, including charter vessels and pleasure craft used for fishing, halibut that have been filleted, mutilated, or otherwise disfigured in any manner, except that each halibut may be cut into no more than 2 ventral pieces, 2 dorsal pieces, and 2 cheek pieces, with skin on all pieces.

Simply add "unless preserved" or "unless preservation facilities are aboard" to the end of this regulation.