



---

**REGULATORY PROPOSAL 2018**  
**Elimination of Law Requiring Skin to Be Left on Halibut Fillets**

**SUBMITTED BY:**  
JAMES SHIRK  
RECREATIONAL FISHERMAN  
UNITED STATES OF AMERICA  
13 OCTOBER 2017

---

**EXPLANATORY MEMORANDUM**

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

I wish to change Regulation 28 d which removes the requirement for skin being left on fillet. Leaving the skin on fillet halibut degrades the quality of the meat . I am a recreational fisherman that goes out for 3 or 4 days and leave my halibut fillets on ice, if the skin is left on it slim the whole cooler and degrades the meat. I was given a ticket and 4 fish (16 fillets) were taken. The District Attorney dismissed the case. I was told by the trooper the skin requirement was to determine if it was a whole fish. I had 16 fillets 4 fish with no skin on them. I asked, "What if I were eat a fresh fillet on the boat, and no longer posses a whole fish?" the Trooper could not answer my question. I do not see why the skin requirement for recreational fishing is even in the regulations. What does this law accomplish?

**SUGGESTED REGULATORY LANGUAGE**

Insert suggested regulatory language 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.