EXPLANATORY MEMORANDUM

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

My wife and I spend 3 months in the summer on our boat in SE Alaska (Area 2C). While
there, we live on the boat, usually away from a marina or town. We also participate in
some of the fishing opportunities while there. We have facilities onboard to process, pack
and freeze fish for preservation for our personal use.

The current IPHC regulation prevents personal use of halibut on the boat, even though
we are living there, and prevents the proper preservation of the catch for future use.

To comply with the current regulations, we must maintain halibut in 4 filets and 2 cheeks
with skin on. This prevents removing a portion of a filet for personal consumption while
on the boat. It further prevents proper processing for future use (skin on tends to taint the
flesh over time) and “meal size” is approximately 1 lb. We are currently at home trying to
process halibut, frozen in 4 filets/fish into “meal size”, skinned packages. I’m sure the
partial thawing/refreezing of this process will degrade the halibut.

SUGGESTED REGULATORY LANGUAGE

In the interest of conservation, proper use and preservation of the halibut, I ask that
Section 28(1)(d) be revised to read:

“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. Except pleasure vessels with live
aboard accommodations and processing facilities, may process, preserve, maintain and
transport halibut on board.”