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**Report of the IPHC Secretariat (2018)**

PREPARED BY: IPHC SECRETARIAT (18 DECEMBER 2018)

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## 1. PURPOSE

To provide the Commission with an update on the activities of the IPHC Secretariat in 2018 (as of 12 December 2018).

## 2. STAFFING IMPROVEMENTS DURING 2018

Full time regular				
FT Arrivals	Type	Hire Date	Status	Position Title
Caroline Robinson	Full time regular	27 June 2018	Active	Fisheries Data Specialist (Recreational, Subsistence, & Data Entry)
Colin Jones	Full time regular	14 January 2019	Contract signed	Survey Specialist (Gear and Bait)
FT Change				
Edward Henry	Full time regular	16 May 2012	Active (promotion 1 July 2018)	Old: Survey Coordinator (Bait) New: Fisheries Data Coordinator (Bycatch)
Lara Erikson	Full time regular	24 Sept 2001	Active (promotion 1 August 2018)	Old: Fisheries Data Manager New: Branch Manager, Fisheries Statistics and Services
Huyen Tran	Full time regular	14 Aug 2002	Active (promotion 12 November 2018)	Old: Fisheries Data Coordinator (Reconciliation, Lead) New: Fisheries Data Manager
FT Departure				
Jamie Goen	Full time regular	27 June 2016	Departed: 30 April 2018	Branch Manager, Fisheries Statistics and Services

Temporary positons				
Temp/contract	Type	Hire Date	Status	Position Title
Anna Simeon	Temporary full time (2-yr contract ending 28 February 2020)	1 March 2018	Active	Biological Science Laboratory Technician (new position)
Suzanne Dodds	Temporary full time (3.5 month contract)	16 May 2018	Departed: 27 August 2018	Undergraduate Intern
Dr. Steven Berukoff	Temporary full-time 2-yr contract ending in October 2020	22 October 2018	Active	MSE Programmer
Dr Piera Carpi	Temporary full-time 2-yr contract ending in March 2021	1 April 2019	Contract signed	MSE Researcher

Current recruitment activities:

Position Title	Reason for vacancy	Status
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Port samplers	Staffing port sampling program for 2019	Port samplers identified for each port to be staffed. Contracts in development for signing ASAP.
Sea samplers	Staffing fishery-independent setline survey (FISS) for 2019	Sea samplers identified, open recruitment to follow.

### 3. IPHC MERIT SCHOLARSHIP FOR 2018

The IPHC funds several Merit Scholarships to support university, technical college, and other post-secondary education for students from Canada and the USA connected to the Pacific halibut fishery. Generally, a single new scholarship valued at US\$4000 per year is awarded every two years. The scholarships are renewable annually for the normal four-year period of undergraduate education, subject to maintenance of satisfactory academic performance. A Scholarship Committee of industry and Commission representatives reviews applications and determines recipients based on academic qualifications, career goals, and relationship to the Pacific halibut industry.

The recipient of the 2018 IPHC Merit Scholarship is **Kaia Dahl** of Petersburg, Alaska, who began her studies at Greenville College in Greenville, Illinois this fall.

The list of current recipients and their expected years of receipt are provided below. Note that in 2016 the IPHC Merit Scholarship shifted from an award of US\$2000 per year for four years, with a new recipient selected each year, to an award of US\$4000 per year for four years, with a new recipient selected every other year.

Name	2015	2016	2017	2018	2019	2020	2021
<b>Shalie Dahl</b> (Petersburg, AK, USA)	\$2000	\$2000	\$2000	\$2000	-	-	-
<b>Ysabel Echeverio</b> (Stevensville, MT, USA)	-	\$4000	\$4000	\$4000	\$4000	-	-
<b>Kaia Dahl</b> (Petersburg, AK, USA)	-	-	-	\$4000	\$4000	\$4000	\$4000

### 4. MEETINGS OF THE COMMISSION AND SUBSIDIARY BODIES DURING 2018

Meetings	No.	Date	Location
Annual Meeting (AM)	94 <sup>th</sup>	22-26 Jan	Portland, USA
Conference Board (CB)	88 <sup>th</sup>	23-24 Jan	Portland, USA
Processor Advisory Board (PAB)	23 <sup>rd</sup>	23-24 Jan	Portland, USA
Finance and Administration Committee (FAC)	94 <sup>th</sup>	22, 25 Jan	Portland, USA
Research Advisory Board (RAB)	19 <sup>th</sup>	28 Feb	Seattle, USA
Management Strategy Advisory Board (MSAB)	10 <sup>th</sup>	9-11 May	Seattle, USA
Scientific Review Board (SRB)	11 <sup>th</sup>	20-21 June	Seattle, USA
Scientific Review Board (SRB)	12 <sup>th</sup>	26-28 Sept	Seattle, USA
Work Meeting (WM)	--	20-21 Sept	Bellingham, USA
Management Strategy Advisory Board (MSAB)	11 <sup>th</sup>	25-26 Oct	Seattle, USA
Interim Meeting (IM)	94 <sup>th</sup>	28-29 Nov	Seattle, USA

## 5. IPHC FISHERY REGULATIONS (2018)

### 5.1. FISHERY REGULATIONS ADOPTED IN 2018

In 2018, the Commission adopted **six (6)** fishery regulations in accordance with Article III of the Convention, as follows:

#### 1) **IPHC Pacific halibut fishery regulations, Section 8. Fishing periods**

IPHC-2018-AM094-R, para. 49: *The Commission **ADOPTED** fishing periods for 2017 as provided below, thereby superseding Section 8 of the IPHC Pacific halibut fishery regulations:*

- a) *IPHC Regulatory Area 2A (Non-Treaty Direct Commercial): 27 Jun, 11 July, 25 July, 8 August, 22 August, 5 September, 19 September.*
- b) *IPHC Canadian and U.S.A. quota-share fisheries: Opening: 24 March – Closing date: 7 November.*

#### 2) **IPHC Pacific halibut fishery regulations, various sections – minor amendments**

IPHC-2018-AM094-R, para. 52: *The Commission **NOTED** and **ADOPTED** regulatory proposal IPHC-2018-AM094-PropA4 which proposed amendments to ensure clarity and consistency in the IPHC Fishery Regulations [with amendments].*

#### 3) **IPHC Pacific halibut fishery regulations, Section 7. Fishing in IPHC Regulatory Areas 4E and 4D, and Section 11. Commercial Catch Limits**

IPHC-2018-AM094-R, para. 55: *The Commission **NOTED** and **ADOPTED** regulatory proposal IPHC-2018-AM094-PropB1 Rev\_1, which proposed IPHC Regulation changes to allow the use of leased Individual Fishing Quota (IFQ) by Community Development Quota (CDQ) organizations in IPHC Regulatory Areas 4B, 4C, 4D and 4E.*

#### 4) **IPHC Pacific halibut fishery regulations, Section 28. Sport Fishing for Pacific Halibut – IPHC Regulatory Areas 2C, 3A, 3B, 4A, 4B, 4C, 4D, 4E**

IPHC-2018-AM094-R, para. 56: *The Commission **NOTED** and **ADOPTED** regulatory proposal IPHC-2018-AM094-PropB2, which proposed a clarification to the IPHC Regulations regarding retention of Pacific halibut caught in the recreational charter fisheries in IPHC Regulatory Areas 2C and 3A.*

#### 5) **IPHC Pacific halibut fishery regulations, Section 28. Sport Fishing for Pacific Halibut – IPHC Regulatory Areas 2C, 3A, 3B, 4A, 4B, 4C, 4D, 4E**

IPHC-2018-AM094-R, para. 63: *The Commission **ADOPTED** the text proposed in IPHC-2018-AM094-23, as modified during the AM094, in response to stakeholder proposal IPHC-2018-AM094-PropC5, which proposed a clarification to the IPHC Regulations regarding filleting of Pacific halibut caught recreationally in Alaska.*

## 6) *IPHC Pacific halibut fishery regulations, Section 19. Fishing Gear*

IPHC-2018-AM094-R, para. 66: *The Commission **ADOPTED** the text proposed in IPHC-2018-AM094-23 in response to stakeholder proposal IPHC-2018-AM094-C13, which proposed a modification to the IPHC Regulations to allow retention of Pacific halibut taken in long-line or single pot gear in the directed Pacific halibut fishery in Alaska, where such gear is permitted by domestic regulation.*

### 5.2. DEFERRED REGULATORY PROPOSALS

At the 94<sup>th</sup> Session of the IPHC Annual Meeting (AM094), the Commission deferred action on a number of stakeholder regulatory proposals and tasked the IPHC Secretariat as follows:

Para. 61. *The Commission **NOTED** that that a number of these proposals touched on issues raised by stakeholders in previous years and **DEFERRED** action on the following proposals to an IPHC Secretariat led working group, to include appropriate Contracting Party agencies, for further study with a view to investigating possible new solutions. For IPHC-2018-AM094-PropC2, in particular, the working group could consider annual limits and new technologies among possible solutions.*

- *IPHC-2018-AM094-PropC2 Preserving catch on private live-aboard vessels (A. Cooper)*
- *IPHC-2018-AM094-PropC4 Sport Fishing for Halibut - Cleaning Regulations (S. Riehemann)*
- *IPHC-2018-AM094-PropC6 Live-aboard processing exemption (D. Robertson)*
- *IPHC-2018-AM094-PropC9 Processing halibut greater than four filets (M. Cowart)*
- *IPHC-2018-AM094-PropC11 Long term storage aboard pleasure vessels (L. Thompson)*
- *IPHC-2018-AM094-PropC12 Long term storage on cruising vessels (W. Cornell)*

**Progress:** Representatives of NOAA-Fisheries Alaska Region Office, NOAA Office of Law Enforcement, and NOAA General Counsel met with the IPHC Secretariat as a working group on 25 September 2018 to discuss the deferred regulatory proposals. The working group reviewed the history of the deferred proposals and the regulatory and enforcement issues associated with them.

The enforcement of recreational fishery bag and possession limits where fishers live aboard their vessels is the primary issue in each of the six deferred proposals. These limits are listed in Section 29 of the IPHC Fishery Regulations (Sport Fishing for Pacific Halibut – IPHC Regulatory Areas 2C, 3A, 3B, 4A, 4B, 4C, 4D, 4E) and their enforcement is the responsibility of authorized officers of the Contracting Party (the USA in this case). During its review, the working group was unable to develop new solutions for the issues raised by the proponents of the deferred proposals. Members of the working group remain open to new ideas that would allow authorities to properly account for recreationally caught fish in an enforceable manner, and agreed to continue to solicit input from stakeholders. The working group prepared an information paper from the meeting for the Commission’s consideration,

provided as [Appendix I](#), which documents the history of existing regulations and provides comments from the working group on the deferred regulatory proposals.

## 6. INTERACTIONS WITH CONTRACTING PARTIES

### 6.1. CANADA

#### 6.1.1. *Fisheries and Oceans Canada (DFO)*

##### a) **Areas of conservation concern**

The IPHC Secretariat worked with Fisheries and Oceans Canada to clarify restrictions on the IPHC fishery-independent setline survey (FISS) in and near areas of conservation concern, in particular the Marine Protected Areas (MPAs) and Rockfish Conservation Areas (RCAs), both for the standard grid of FISS stations fished each year and for the expansion stations fished in 2018.

#### 6.1.2. *Halibut Advisory Board (HAB)*

- b) The Executive Director participates as a HAB member, with other Secretariat staff in support. This relationship is expected to continue into the future given the HAB's contributions to the Canadian decision-making process.
- c) HAB meetings in 2018 were attended via webinar throughout the year, and in person on 11 December 2018 (Vancouver, Canada).

### 6.2. UNITED STATES OF AMERICA

#### 6.2.1. *NOAA FISHERIES*

- a) As noted in [section 5.2](#) above, representatives of NOAA Fisheries Alaska Region Office, NOAA Office of Law Enforcement, and NOAA General Counsel met with the IPHC Secretariat as a working group on 25 September 2018 to discuss the regulatory proposals deferred at AM094.

#### 6.2.2. *NORTH Pacific Fishery Management Council (NPFMC)*

##### b) **Abundance-Based Management of Pacific halibut bycatch (ABM)**

The NPFMC's Abundance-Based Management Working Group (ABMWG) continued its work from 2017, with participation of the IPHC Secretariat. The IPHC submitted a letter to the NPFMC in early 2018 ([IPHC to NPFMC 17 January 2018](#)), commenting on the ABMWG's work to date and providing input to its further development. The NPFMC replied to the IPHC's letter in March ([NPFMC to IPHC 6 March 2018](#)), which was noted by the IPHC ([IPHC to NPFMC 29 March 2018](#)).

At its April 2018 meeting, the NPFMC reviewed a discussion paper prepared by the ABMWG and drafted a suite of alternatives for abundance-based Pacific halibut prohibited species catch (PSC) limits for the Bering Sea and Aleutian Islands (BSAI) groundfish fisheries, for preliminary analysis. This preliminary analysis was presented to the NPFMC at its October 2018 meeting, and the NPFMC adopted a number of revisions and clarifications to the alternatives to be examined ([Council motion C6](#)).

The Commission has supported the development of ABM due to its potential effect on the directed Pacific halibut fisheries, and may wish to provide further input to the NPFMC regarding the process, particularly with respect to the ABMWG timeline and the resources dedicated to the task.

### **6.2.3. Pacific Fishery Management Council (PFMC)**

#### **a) IPHC Regulatory Area 2A Catch Sharing Plans / in-season management / IPHC data**

The IPHC Secretariat collaborated with NOAA Fisheries and State agencies to conduct in-season management of the various fisheries identified in the IPHC Regulatory Area 2A Catch Sharing Plan. Date and possession restrictions were adjusted in season among the various fisheries to meet identified fishery needs while attaining and remaining within the applicable catch limits. Estimates of removals for 2018 will be presented during the IPHC Annual Meeting Agenda Item 5 on fishery statistics (see paper [IPHC-2019-AM095-05](#)).

#### **b) IPHC Regulatory Area 2A non-tribal directed commercial fishery**

In 2017, the IPHC Secretariat initiated discussion with the PFMC, as well as with NOAA Fisheries and the relevant State agencies, regarding the management of the non-tribal directed commercial Pacific halibut fishery in IPHC Regulatory Area 2A, with the goal of moving away from its current derby-style management. The IPHC Secretariat noted concerns over safety and discards, as well as limitations on fishers and processor flexibility.

Discussion continued during 2018, focused on the IPHC's proposal to change the length of the fishing period for this fishery. A complete review of the proposal and the discussion to date, including correspondence between the IPHC and the PFMC, is presented in [IPHC-2019-AM095-PropA2](#).

## **7. IPHC COMMUNICATIONS AND OUTREACH**

### **7.1. IPHC Website**

We have received positive reviews for the new IPHC website (<http://iphc.int/>), launched on 15 December 2017 as the culmination of a year-long project by the IPHC Secretariat.

The IPHC Secretariat will continue to develop different ways to publish data and statistics for our stakeholders, focusing particularly on the addition of timely and useful visual displays such as our interactive maps and our online fishery-independent setline survey (FISS) data query. New developments to be presented at the IM094, including FISS pages and catch tables.

### **7.2. Annual Report**

The 2017 Annual Report is available for download from the IPHC website at the following link: <http://iphc.int/library/documents/category/annual-reports>. We are now using an accelerated production timeline for the IPHC Annual Report, thereby ensuring users of the report receive the summary information as close to the relevant year as possible. Continued feedback on the content, format and presentation of the Annual Report is welcome.

The 2018 Annual Report is on-track for publication at the end of February 2019.

### **7.3. Report of Assessment and Research Activities (RARA)**

The IPHC [Report of Assessment and Research Activities \(RARA\)](#) was intended to supply progress reports on current projects and monitoring that are underway at the IPHC. In past years, this document included fishery information, monitoring activities, stock assessment, and research reports about the previous year's activities, which are now provided as detailed papers for the Annual Meeting. This allows us to update our documents in real time as data become available, ensuring that Commissioners and stakeholders have access to the most recent information possible for the decision-making process at the Annual Meeting. We are in the process of integrating this remaining RARA material into the new [IPHC Science and Research](#) pages of the website, where it can be updated in near real time, thus eliminating the need for future compendiums of this nature.

For AM095, the RARA will be provided as an Information Paper only, and will consist of a hyperlinked table of contents. All relevant documents are now incorporated as Annual Meeting papers, or as live documents on the research pages of the IPHC website. Thus, the RARA has been discontinued.

### **7.4. IPHC Circulars and News Releases/Bulletins**

[IPHC Circulars](#), introduced in late 2016, will continue to serve as the formal inter-sessional communication mechanism for the Commission. Circulars are used to announce meetings of the Commission and its subsidiary bodies, as well as inter-sessional decisions made by the Commission.

[IPHC News Releases](#), will continue for the foreseeable future, as the primary 'informal' communication with all stakeholders. In some cases these will duplicate the formal communications provided in IPHC Circulars.

An **IPHC News Bulletins** series is currently being developed to report stories and features of interest to the Pacific halibut community.

In addition, the IPHC Secretariat is moving to fully electronic information distribution. IPHC Circulars, News releases, News bulletins, and similar information will be posted on the IPHC website and distributed via email only. As such, stakeholders are encouraged to request that their email addresses be added to IPHC distribution lists at the following link: <https://iphc.int/form/news-letter>. Hard copies of communications will be discontinued at some point in 2019.

## **8. IPHC PUBLICATIONS IN 2018**

### **8.1. Published peer-reviewed journal papers**

Drinan DP, **Loher T** & Hauser L (2018) Identification of genomic regions associated with sex in Pacific halibut. *Journal of Heredity* 109(3):326-332.

Hershberger PK, Gregg JL & **Dykstra CL** (2018) High-prevalence and low-intensity *Ichthyophonus* infections in Pacific halibut. *Journal of Aquatic Animal Health* 30:13-19.



- LeBris A, Fisher JAD, Murphy HM, Galbraith PS, Castonguay M, **Loher T** & Robert D (2018) Migration patterns and putative spawning habitats of Atlantic halibut (*Hippoglossus hippoglossus*) in the Gulf of St. Lawrence revealed by geolocation of pop-up satellite archival tags. ICES Journal of Marine Science 1(1):135-147.
- Loher T & Soderlund E** (2018) Connectivity between Pacific halibut *Hippoglossus stenolepis* residing in the Salish Sea and the offshore population, demonstrated by pop-up archival tagging. Journal of Sea Research. doi: 10.1016/j.seares.2018.09.007.
- Monnahan CC & **Stewart IJ** (2018) The effect of hook spacing on longline catch rates: implications for catch rate standardization. Fisheries Research. 198: 150-158.
- Nielsen JK, Rose CS, Lindstrom T, **Loher T**, Drobny P, Seitz AC, Courtney MB & Gauvin J (2018) Characterizing activity and detecting bycatch mortality of Pacific halibut with accelerometer Pop-up Satellite Archival Tags. Animal Biotelemetry 6:10. doi: 10.101186/s40317-018-0154-2
- Stewart IJ & Hicks AC** (2018) Inter-annual stability from ensemble modelling. Canadian Journal of Fisheries and Aquatic Sciences. 75: 2109-2113.

### 8.2. *In press peer-reviewed journal papers*

- Kuriyama PT, Branch TA, **Hicks AC**, Harms JH & Hamel OS (2018) Investigating three sources of bias in hook-and-line surveys: survey design, gear saturation, and multispecies interactions. Canadian Journal of Fisheries and Aquatic Sciences. *In press*. <https://doi.org/10.1139/cjfas-2017-0286>

### 8.3. *Submitted peer-review journal papers*

- Broell F, **Loher T**, Seitz AC, Taggart C & Nielsen JK (*In review*) Solar illumination affects activity and dive characteristics in a large demersal flatfish during the summer foraging period. Ecosphere
- Nielsen JK, Mueter FJ, Adkinson MD, **Loher T**, McDermott SF & Seitz AC (*In review*) Effect of study area bathymetric heterogeneity on parameterization and performance of a depth-based geolocation model for demersal fish. Ecological Modelling.
- Rose CS, Nielsen JK, Gauvin J, **Loher T**, Sethi S, Seitz AC, Courtney MB & Drobny P (*In review*) Pacific halibut (*Hippoglossus stenolepis*) survivals after release from trawl catches through expedited sorting: deploying advanced tags in quantity (160) reveals patterns in survival outcomes. Canadian Journal of Fisheries and Aquatic Sciences.

## 9. RECOMMENDATION

That the Commission:

- 1) **NOTE** paper IPHC-2019-AM095-04 which provides the Commission with an update on activities of the IPHC Secretariat in 2018 not detailed in other papers before the Commission.

## APPENDICES

Appendix I: [2018 IPHC Regulatory Proposals referred to a Working Group of IPHC Contracting Party agencies](#)



**APPENDIX I**  
**2018 IPHC REGULATORY PROPOSALS REFERRED TO A WORKING GROUP OF IPHC**  
**CONTRACTING PARTY AGENCIES**

## Background

The 2018 IPHC Annual Meeting (AM094) was held January 22-26 in Portland, Oregon. Among the regulatory proposals submitted by stakeholders, six proposals sought regulatory changes that would affect the processing and / or long-term storage of halibut onboard vessels. The Commission did not take action on these proposals, and instead referred them to an ad-hoc working group. The AM094 report states:

*The Commission **NOTED** that a number of these proposals touched on issues raised by stakeholders in previous years and **DEFERRED** action on the following proposals to an IPHC Secretariat led working group, to include appropriate Contracting Party agencies, for further study with a view to investigating possible new solutions. For IPHC-2018-AM094-PropC2, in particular, the working group could consider annual limits and new technologies among possible solutions.*

*IPHC-2018-AM094-PropC2; Preserving catch on private live-aboard vessels (A. Cooper)*  
*IPHC-2018-AM094-PropC4; Sport Fishing for Halibut - Cleaning Regulations (S. Riehemann)*  
*IPHC-2018-AM094-PropC6; Live-aboard processing exemption (D. Robertson)*  
*IPHC-2018-AM094-PropC9; Processing halibut greater than four filets (M. Cowart)*  
*IPHC-2018-AM094-PropC11; Long term storage aboard pleasure vessels (L. Thompson)*  
*IPHC-2018-AM094-PropC12; Long term storage on cruising vessels (W. Cornell)*

## Existing Regulations

The relevant regulations for these proposals are found in Section 29 of the IPHC's Pacific Halibut Fishery Regulations (2018). Under the terms of the Northern Pacific Halibut Act, IPHC fishery regulations may be accepted by the United States Secretary of State as annual management measures and implemented as regulations by NOAA-Fisheries (National Marine Fisheries Service (NMFS)). The NMFS regulations are published annually in the Federal Register (50 CFR 300.65).

Section 29 of the IPHC Fishery Regulations (2018) and the relevant paragraphs read as follows:

**29. Sport Fishing for Pacific Halibut - IPHC Regulatory Areas 2C, 3A, 3B, 4A,  
4B, 4C, 4D, 4E**

- (1) In Convention waters in and off Alaska:
- (a) The sport fishing season is from 1 February to 31 December.
  - (b) The daily bag limit is two Pacific halibut of any size per day per person unless a more restrictive bag limit applies in Commission regulations or Federal regulations at 50 CFR 300.65.
  - (c) No person may possess more than two daily bag limits.

- (d) No person shall possess on board a vessel, including charter vessels and pleasure craft used for fishing, Pacific halibut that have been filleted, mutilated, or otherwise disfigured in any manner, except that each Pacific halibut may be cut into no more than 2 ventral pieces, 2 dorsal pieces, and 2 cheek pieces, with a patch of skin on each piece, naturally attached.
- (e) Pacific halibut in excess of the possession limit in paragraph (1)(c) of this Section may be possessed on a vessel that does not contain sport fishing gear, fishing rods, hand lines, or gaffs.

Similar regulations are found elsewhere in the IPHC Fishery Regulations (2018) for waters outside of Alaska. For Pacific halibut sport fishing in IPHC Area 2A, Section 27(4), reads as follows:

- (4) In California, Oregon, or Washington, no person shall fillet, mutilate, or otherwise disfigure a Pacific halibut in any manner that prevents the determination of minimum size or the number of fish caught, possessed, or landed.

And for Pacific halibut fishing in the waters off British Columbia, 2018 regulations in Section 28(2) are similar:

- (2) In British Columbia, no person shall fillet, mutilate, or otherwise disfigure a Pacific halibut in any manner that prevents the determination of minimum size or the number of fish caught, possessed, or landed.

The current regulations for Alaska waters at Section 29(d), which specify the extent to which a Pacific halibut may be filleted on board a vessel in Alaska waters (2 ventral pieces, 2 dorsal pieces, 2 cheek pieces, with a patch of skin on each piece), were added in 2008. Prior to 2008, regulations for Pacific halibut retention in Alaska waters were worded very similar to the current regulations for the waters of the Pacific West Coast and British Columbia, as indicated above.

Current regulations at Section 29(e), which allow possession of Pacific halibut in excess of the possession limit on vessels that do not contain sport fishing gear, were added in 2009. The effect of this regulation is to allow the transportation of Pacific halibut on Convention waters from one site to another. This often occurs at remote fishing lodges when the lodges transport their clients and preserved fish to a city or town.

### **Contracting Parties; Comments from the Working Group**

As directed, an ad-hoc working group of the contracting party agencies was formed to review the proposals referenced above. As they only impacted USA fishers, Canada was not engaged. The working group consisted of the IPHC Secretariat, NOAA-Fisheries NMFS Sustainable Fisheries, NOAA Fisheries Office of Law Enforcement (OLE), and attorneys from the NOAA Office of General Counsel.

The Working Group noted that regulations restricting the amount of filleting or chunking of Pacific halibut are necessary for the enforcement of bag and possession limits among sport fishers. Proposals to change or do away with these regulations have been suggested in the past, as well

as in 2018. To date, the IPHC has not been presented with a consistent, easily verifiable option that would replace the current regulations and still allow effective enforcement of the bag and possession limits. Contemporaneous information that would be self-reported by the angler prior to processing a Pacific halibut on a vessel, such as logging the angler's fishing license number, the location of the catch, and taking photographs of the fish, raise concerns of compliance and verification that would not be satisfied by the proposal. The Working Group notes that regulations limiting the processing of sport-caught fish on vessels are consistent for all management areas under the jurisdiction of the IPHC. Similar regulations are also common among the State and Provincial agencies for other sport fish species besides Pacific halibut. Given these considerations, the Working Group advises no changes to Section 29(1)(d) and recommends that the Commission not adopt proposals C2, C4, and C9 at this time.

The Working Group also discussed the proposals that would exempt anglers on some vessels from the Pacific halibut possession limits and/or the restrictions on filleting or chunking of Pacific halibut, if the Pacific halibut onboard the vessel is preserved or processed in a manner for long-term storage. Some of the proposals suggest the preserved fish exemption should be specific to live-aboard vessels. In general, the Working Group expressed concerns with creating a separate class of anglers on certain vessels on Convention waters that would not be restricted by possession limits and/or be exempt from the limits on filleting or processing of fish.

The Working Group also notes that possession limits and restrictions on the amount of filleting work in tandem with daily bag limits, and that effective enforcement of daily limits could also be affected by the proposals. Some of the proposals in this group suggest that anglers on vessels with preserved fish could assist with the enforcement of the bag and possession limits by logging their catches and recording photographs of each fish. Again, as indicated above, this raised concern among the Working Group for compliance of the rules and maintaining a consistent method of verification of the logged catches.

For those proposals that seek exemptions for live-aboard vessels, the Working Group expressed further concerns with defining a live-aboard vessel, and verifying the status of the vessel on a continuing basis. Some Working Group members questioned whether the possession limit exemption would apply to all anglers who step aboard a live-aboard vessel.

With respect to Proposals C6, C11, and C12 the Working Group recommends that the Commission take no action on these proposals at this time.