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**IPHC Fishery Regulations: Recreational (Sport) Fishing for Pacific Halibut –  
IPHC Regulatory Areas 2C, 3A, 3B, 4A, 4B, 4C, 4D, 4E (Sect. 28) – Onboard consumption**

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Directed Commercial  Recreational  Subsistence  Non-directed commercial  All   
All Regulatory Areas  All Alaska Regulatory Areas  All U.S. Regulatory Areas   
2A  2B  2C  3A  3B  4A  4B  4C  4D  4E

**PURPOSE**

To propose increased flexibility for the onboard consumption of recreationally-caught Pacific halibut in Alaska.

**EXPLANATORY MEMORANDUM**

The Boat Company conducts week-long tours in Southeast Alaska during which between 20 and 24 guests hike, kayak, view wildlife and glaciers and do guided sport fishing for halibut and other fish species. Not every guest fishes for halibut, but for those who do, it is a highlight of their trip. Our guests harvest small numbers of halibut compared to other charter operations, and many guests would prefer to consume halibut onboard prepared by *The Boat Company's* chefs and transport smaller, if any, fish boxes home.

IPHC Fishery Regulations (2023), Section 28(1)(d) governing sport fishing in Alaska regulatory areas 2C, 3A, 3B, and 4A-E provides that:

*“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. Either one dorsal piece or one ventral piece from one Pacific halibut on board may be consumed.”*

The 2023 regulation limits onboard consumption to one piece of halibut. At current size limits unlikely to change in the near future, the regulation makes it difficult to serve meal size portions to all of our guests from just one ventral or one dorsal piece caught by a small number of guided anglers. This dilemma occurs for other recreational anglers on a multi-day trip who have only a small number of Pacific halibut on board his boat at any given time - the regulations do not allow for reasonable on-board consumption during a multi-day trip.

The Boat Company requests that the Commission revise the regulation in a way that will still enable enforcement officials to verify compliance with size and daily bag limits while allowing anglers and their companions who do not return to port each day to enjoy eating more than one small piece of halibut while at sea. The regulation should first harmonize the Alaska regulations

with regulations for recreational anglers in California, Oregon, Washington and British Columbia that neither limit the number of pieces into which a Pacific halibut may be cut nor require that a patch of skin remains naturally attached to each piece. 2023 regulations 27(2) and 26(4) governing sport fishing in British Columbia, Washington, Oregon and California provide that “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.” This change would maintain the same regulations that allow effective enforcement of bag and possession limits in other regulatory areas.

However, additional language will provide clearer direction to recreational fishermen as to how to process halibut for onboard meals and keep records for enforcement purposes. Fishermen or their guides would photograph of the halibut alongside a measuring device in order to allow for compliance with size limits. The carcass would be separately retained onboard, and labeled by date, time, angler’s name and total number of halibut retained by the individual angler and there would be a separate log of each consumed fish. Enforcement officers could then inspect the log, carcass, photograph, other packaged fish on board the vessel and determine compliance with size and bag limits.

As a final note, while the suggested regulatory language would enable onboard consumption of six pieces of halibut, language that allows consumption of one ventral and one dorsal piece would be significant improvement over the current situation.

[Appendix A](#) provides details on the suggested regulatory language.

## **RECOMMENDATIONS**

That the Commission:

- 1) **NOTE** regulatory proposal IPHC-2024-AM100-PropC2 that proposes increased flexibility for the onboard consumption of recreationally-caught Pacific halibut in Alaska.

## **APPENDICES**

[Appendix A](#): Suggested regulatory language

## APPENDIX A SUGGESTED REGULATORY LANGUAGE

Amend § 28(1)(d) governing recreational fishing in Alaska to be consistent with 2023 regulations 27(2) and 26(4) governing IPHC Regulatory Area 2A and 2B, and add an exception that allows fishermen on a multiday to process Pacific halibut for onboard consumption, subject to measures to facilitate enforcement of the applicable daily bag limits, as follows:

### 28. Recreational (Sport) Fishing for Pacific Halibut—IPHC Regulatory Areas 2C, 3A, 3B, 4A, 4B, 4C, 4D, 4E

(1) In Convention waters in and off Alaska:

[...]

(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. ~~Either one dorsal piece or one ventral piece from one Pacific halibut on board may be consumed;~~ Any person on board a vessel doing multi-day trips, whether private or guided, may further fillet or otherwise process Pacific halibut for immediate consumption or preservation for later consumption if the person does all of the following:

(1) Maintain on board and available for inspection by an authorized officer the carcass and a photograph of each Pacific halibut caught and used for onboard consumption that also shows the measured length of the halibut accompanied by information indicating the date and approximate time at which the Pacific halibut in the photograph was caught.

(2) Maintain on board and available for inspection by an authorized officer a separate log of each Pacific halibut consumed onboard that lists (1) the date and approximate time of catch; (2) the length and (3) indicates the portions of the Pacific halibut packaged for later consumption.