



Stakeholder comments on IPHC Fishery Regulations or published regulatory proposals

PREPARED BY: IPHC SECRETARIAT (B. HUTNICZAK; 22 OCTOBER & 2 DECEMBER 2025)

PURPOSE

To provide the Commission with a consolidated document containing comments from stakeholders on IPHC Fishery Regulations or published regulatory proposals submitted to the Commission for its consideration at the 101st Session of the IPHC Interim Meeting (IM101).

BACKGROUND

The IPHC Secretariat has continued to make improvements to the [Fishery Regulations](#) portal on the IPHC website, which includes instructions for stakeholders to submit comments to the Commission for its consideration. Specifically:

“Informal statements or comments on IPHC Fishery Regulations or published regulatory proposals can be submitted using the form below up until the day before the IPHC Session. Submitted comments will be collated into a single document and provided to the Commissioners at the IPHC Session.”

Comments may be submitted using the [IPHC Stakeholder Comment Form](#).

DISCUSSION

[Table 1](#) provides a list of the stakeholder comments which are provided in full in the Appendices. The IPHC Secretariat does not provide commentary on the statements, but simply collates them in this document for the Commission’s consideration.

Table 1. Statements from stakeholders received by noon on 20 October 2025.

Appendix No.	Title and author	Date received
Appendix I	Denny Corbin, Pacific halibut fisherman	4 May 2025
Appendix II	Forrest Braden, Southeast Alaska Guides Organization	1 December 2025

RECOMMENDATION

That the Commission:

- 1) **NOTE** paper IPHC-2025-IM101-INF01 Rev_1 that provides the Commission with a consolidated list of comments from stakeholders on IPHC Fishery Regulations or published regulatory proposals submitted to the Commission for its consideration at the 101st Session of the IPHC Interim Meeting (IM101).

APPENDICES

As listed in [Table 1](#).

APPENDIX I**Statement by Denny Corbin (Pacific halibut fisherman)**

Topic	This is a comment regarding mortality of undersized Pacific halibut as a cause of stock decline and the solution.
Section of IPHC Fishery Regulations or regulatory proposal reference the comment will refer to	NA
Submitted comment	<p>Pacific halibut stocks are at their lowest in 40 years. What is the cause of this? I propose that the main source of decline is excessive mortality from release of small fish.</p> <p>It works like this:</p> <ol style="list-style-type: none"> 1. Various environmental factors in the last few decades caused a boom in the Pacific halibut stock but this resulted in massive schools of small fish that were either under 32" or legal but small and not worth as much money resulting in "high-grading". 2. What happens when you set gear and it comes back with undersized Pacific halibut every hook for miles? The fisherman's hands hurt from decades of work at the roller. It is a lot of extra time and wear and tear physically for a fisherman to properly release small Pacific halibut without harm. When balls of fire/pain are running up and down your arms and hands and your back is about ready to blow the choice is simple. Bring down the crucifier (the bait removal device...) and turn the hydraulics up full blast. This rips the faces from the small Pacific halibut as they are torn off the hooks and fall back into the water. It is likely that mortality is high when half the face is missing. 3. After a while fishing on schools of small Pacific halibut in this manner, these schools were decimated. This may be why there is still some good fishing for a portion of the season now, but then it goes dead. The fish schools that are still ok were the larger fish but those schools are not as numerous, and big schools of small Pacific halibut that were affected and now in bad shape overall are not recruiting as many to larger fish. There are of course many factors that could affect a population of fish, but in my estimation this (illegal) method of releasing small Pacific halibut with a crucifier was the main cause. 4. It is of course illegal to release Pacific halibut in this manner. But in the real world, absent an observer, it is likely still and definitely has been done excessively in the past. As the fishery has developed and the older generation has aged out this practice may be much less, however, in my opinion it should be considered as a dominant factor over the last several decades that has resulted in the current predicament. 5. I have written in the past regarding this issue but it has been ignored because there was never a reasonable solution. The fishery management was dominated by commercial interests and it has always been easier to engage in fantasies blaming other factors and user groups instead of acknowledging the real issue. However, now with the advent of Starlink high speed satellite it is possible to monitor the roller for every fish. And yes, I realize that observer coverage is draconian and much of the fishing is now monitored and that the fleet likely now uses better practices to avoid mortality. However, it may be useful to at least look

back and understand that mortality from the commercial fleet releasing small fish has been a major factor in the Pacific halibut stock decline.

6. The solution. Require camera monitoring of every fish and limit the soak time so that fish are not laying on the bottom becoming exhausted. Yes, it is hard, but if there is hope for a rebound in Pacific halibut stock this is what needs to happen, a focus on best practice to avoid mortality of released fish and full-time monitoring to keep everyone honest.

Thank you for your consideration

APPENDIX II

Statement by Forrest Braden (Southeast Alaska Guides Organization)

Topic	Harvest Decision Table
Section of IPHC Fishery Regulations or regulatory proposal reference the comment will refer to	NA
Submitted comment	<p>IPHC Commissioners,</p> <p>Southeast Alaska Guides Organization represents the interests of Southeast’s guided saltwater sportfishing fleet, which accounts for roughly half of Alaska’s marine charter sector by vessel count and angler participation. The fleet plays a key economic role for the State and region.</p> <p>The Alaska charter fleet needs your support—especially in Southeast, where current regulations have become a major deterrent for new and returning clients. Guided halibut anglers in Area 2C have seen opportunity fall from two halibut per day without size limits to one halibut per day under 37 inches, and not all harvest can realistically meet that mark. Recent size averages hover around 31 inches—smaller than the commercial legal size and below the criteria the IPHC uses for area distribution. Area 2C cannot absorb further reductions to FCEY.</p> <p>The Commission is meeting all biological targets. The current relative spawning biomass is successfully above the B36 minimum threshold. Regional survey distribution is within normal ranges. Total spawning biomass is increasing. Status quo TCEY is currently 9 million pounds below the 3-year surplus.</p> <p>The Commission’s recent tactical cuts may have contributed to the uptick in spawning biomass, but the primary drivers of stock growth remain the size of incoming year classes and weight at age. The Secretariat has repeatedly stated that there is no established link between the level of spawning biomass and good recruitment events, which leaves tactical cuts somewhat arbitrary and aimed to a large extent at the economics of the fishery— chiefly the commercial fishery.</p> <p>Sport fisheries function very differently than commercial fisheries. Scarcity in commercial fisheries can increase economic returns with higher ex-vessel prices and lower fishing costs as seen this past fishing season. Lost opportunity in the charter fishery decreases value, reduces revenue through lower participation, and leads to a loss of future demand. Building and maintaining a client base takes years, and losing momentum has long-term consequences.</p>

We urge you not to cut Coastwide TCEY but to consider a modest increase to help alleviate the strain on the guided sport fisheries. Status Quo +5 would help. At F49% (still conservative against an F46% the Commission is currently considering for long-term harvest strategy), the decision table shows a 78% probability spawning biomass in 2029 will be equal or higher than it is now. Those are good odds. The Secretariat will continue to survey and project three years out based on incoming year classes and weight at age, and the Commission can adjust future catch limits as needed, but we need relief now.

Respectfully,

Forrest Braden

Kim Landeen

SEAGO Co-directors