



IPHC Fishery Regulations:

Recreational (Sport) Fishing for Pacific Halibut - IPHC Regulatory Areas 2C, 3A, 3B, 4A, 4B, 4C, 4D, 4E (Sect. 28) – supporting information for unguided sector bag limit

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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 ☒ 4CDE ☒

PURPOSE

To ensure that any proposed reduction to the unguided recreational Pacific halibut daily bag limit in Alaska is supported by region-specific biological and socio-economic information provided by the United States, and include analyses developed in cooperation with the Alaska Department of Fish and Game, prior to adoption by the Commission.

EXPLANATORY MEMORANDUM

Recent stakeholder submissions to the Commission propose a uniform statewide reduction to the unguided recreational daily bag limit for Pacific halibut in Alaska. Although such proposals may stem from legitimate conservation concerns, unguided recreational participation varies substantially across Alaska's IPHC regulatory areas. The biological, social, and economic impacts of reductions will not be uniform across all regions.

Alaska's Pacific halibut regulatory areas are characterized by significant differences in geographic scale, fish abundance, population density, and coastal access between Areas 2C, 3A, 3B, and 4A–4E. Among the large differences are rates of resident and non-resident participation, road-system access and small-boat coastal participation. There are distinct patterns of recreational effort; and existing management frameworks that interact with unguided effort.

Because of these regional differences, a statewide bag-limit reduction will have significant and disproportionate consequences that cannot be adequately evaluated without region-specific biological and socio-economic assessment. At this time, no such region-specific analysis has been provided to the Commission by the United States.

Recreational participants in the Pacific halibut fishery do not have formal representation within the IPHC's decision-making structure, and unguided recreational participants are not represented through dedicated institutional mechanisms within the IPHC's decision-making framework. Decisions affecting domestic recreational harvest measures made without sufficient biological and socio-economic data or without the input of the Alaska Department of Fish and Game risk being made without the benefit of a forum specifically designed to adequately evaluate their overall impacts.

This concern is not novel. As documented in IPHC Technical Report No. 26, the United States has maintained a long-standing policy position that recommendations involving domestic allocation of the halibut resource should be developed through the appropriate Regional Fishery Management Council, where public process, stakeholder representation, and analytical review are explicitly required.

Absent such procedural guardrails, the Commission risks establishing domestic recreational measures without prior Council analysis, while simultaneously limiting future opportunities to evaluate, refine, or reverse those measures due to the absence of a formal analytical record. Establishing these guidelines before considering changes to unguided recreational limits helps ensure that any future actions are informed, reversible, and consistent with established domestic governance frameworks.

While agencies and stakeholder organizations may provide input, the dispersed and non-commercial nature of the recreational sector means that its impacts are often conveyed indirectly, underscoring the importance of explicit procedural guidance when considering changes that affect unguided participants.

The intent of this proposal is not to preclude Commission action on unguided recreational measures. Rather, it is to ensure that any future action is grounded in regionally appropriate analyses developed through domestic processes, including information prepared by the Alaska Department of Fish and Game (ADF&G) and other U.S. agencies. Incorporating these analyses will help ensure that regulatory changes are transparent, equitable, biologically defensible, and consistent with the Commission's long-standing reliance on domestic scientific and management processes.

PROPOSED REGULATORY LANGUAGE

Add the following paragraph to Section 28:

- (4) In considering any reduction to the daily bag limit for unguided recreational (sport) fishing in Convention waters off Alaska, the Commission shall take into account region-specific biological and socio-economic data provided by the United States, including analyses developed in cooperation with the Alaska Department of Fish and Game. Any such reduction should be limited in scope to those regulatory areas for which region-specific analysis demonstrates a clear biological or socio-economic basis for action. For clarity, this provision applies only to actions that further restrict unguided recreational bag limits and is not intended to limit the Commission's ability to relax or remove such restrictions.

RECOMMENDATIONS

That the Commission:

- 1) **NOTE** regulatory proposal IPHC-2026-AM102-PropC3, which provides that proposed reduction to the unguided recreational Pacific halibut daily bag limit in Alaska is supported by region-specific biological and socio-economic information provided by the United States, and include analyses developed in cooperation with the Alaska Department of Fish and Game, prior to adoption by the Commission.