INTERNATIONAL PACIFIC HALIBUT COMMISSION

Stakeholder comments on IPHC Fishery Regulations or published regulatory proposals

PREPARED BY: IPHC SECRETARIAT (20 DECEMBER 2025 & 2 JANUARY 2026)

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 102nd Session of the IPHC Annual Meeting (AM102).

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 10am on 2 January 2026.

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	19 December 2025
Appendix III	Buck Laukitis, Bering Sea Pacific halibut fisherman	19 December 2025
Appendix IV	Various authors opposing stakeholder regulatory proposal C1 (IPHC-2026-AM102-PropC1) – 562 comments in total	21 December 2025 to 2 January 2026

RECOMMENDATION

That the Commission:

1) **NOTE** paper IPHC-2026-AM102-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 102nd Session of the IPHC Annual Meeting (AM102).

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	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. It works like this: 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	This is a comment regarding the Harvest Decision Table.
Section of IPHC Fishery Regulations or regulatory proposal reference the comment will refer to	NA
Submitted comment	Southeast Alaska Guides Organization 1600 Tongass Ave. Ketchikan, AK 99901

IPHC Commissioners,

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.

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.

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.

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.

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.

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

APPENDIX III

Statement by Buck Laukitis, Bering Sea Pacific halibut fisherman

Topic	Precautionary Reductions in Regulatory Area 4 Catch Limits, Designation of Bering Sea Halibut as Depleted, and Development of a Rebuilding Plan
Section of IPHC Fishery Regulations or regulatory proposal reference the comment will refer to	NA
Submitted comment	Proposal to the International Pacific Halibut Commission (IPHC): Call for Precautionary Reductions in Regulatory Area 4 Catch Limits, Designation of Bering Sea Halibut as Depleted, and Development of a Rebuilding Plan Submitted by: Buck Laukitis, Bering Sea Halibut Fisherman Date: December 18, 2025 Dear IPHC Commissioners and Staff, As a longtime commercial halibut fisherman operating in the Bering Sea (Regulatory Area 4), I am writing this proposal out of deep concern for the future of our fishery. I’ve spent decades on these waters, and what I’m seeing firsthand is alarming: fewer and smaller fish, unprecedented difficulty in locating halibut, and catches falling far short of allocations—less than half in 2024 and 2025. I’m not a scientist, and I don’t claim expertise in complex models, but I know the ocean doesn’t lie. Fishermen like me are the ones out there every day, and as fleet averages suggest we’re reporting that conditions are getting worse, not better. History shows that fishery models have been wildly wrong before—look no further than the Atlantic cod collapse in the 1990s,

where optimistic assessments ignored fishermen's warnings and led to commercial extinction and economic devastation in Newfoundland and the Gulf of Maine. Major revisions to IPHC models happened in the early 2000s, overestimating the biomass of halibut, and I believe we're on the cusp of needing similar humility and updates now. The precautionary principle demands we act conservatively when uncertainty is high, especially with sparse surveys and real-world indicators screaming for caution. Delaying risks irreversible harm to the stock and our livelihoods.

To protect this resource, I urge the IPHC to:

1) Reduce the Total Constant Exploitation Yield (TCEY) in Regulatory Area 4 by 10-50% for 2026, with the exact percentage in each sub area decided at the annual meeting but prioritizing higher end cuts amid current low abundance.

2) Formally designate the Bering Sea halibut resource as depleted, triggering conservation actions.

3) Develop and implement a comprehensive Area 4 Rebuilding Plan for consideration and adoption by the 2027 annual meeting. The plan should include incorporating regional biomass metrics, solutions to difficulties with surveys due to budget and whales, acknowledging that the majority of mortality in the Bering Sea is from fleets not managed by the IPHC, collaborating with NMFS on habitat areas of particular concern, and other stakeholder input.

Below, I outline many of the same points I made at the annual meeting last year. I appreciate the IPHC's attention to problematic dynamic B, and definitions of over-fished, over-fishing and depleted, however the terms have not been defined a year later, and as such stakeholders are still vulnerable to shifting interpretations of a very low stock size. My arguments emphasize the absolute low spawning biomass, overly optimistic model assumptions, the need for regional assessments given disproportionate Bering Sea pressures, and protection for critical spawning habitats. Combined with persistent under-harvests and survey gaps, these factors make a compelling case for immediate action.

1. Absolute Spawning Biomass at Historic Lows Demands Precautionary Cuts. The Pacific halibut spawning biomass is at or near its lowest absolute level in over 40 years, a clear indicator of stock vulnerability that warrants immediate harvest reductions to prevent potential collapse. According to the IPHC's 2024 stock assessment (for 2025 management), female spawning biomass at the start of 2025 is estimated at just 149 million pounds (67,500 tonnes), representing about 38% of unfished levels when calculated using dynamic unfished biomass—a slight uptick from 2024's 145 million pounds but still perilously close to precautionary thresholds. When referenced in absolute terms, coastwide spawning biomass is closer to 20% of what it was 25-30 years ago; a level that would not be inconsistent with complete fishery closure in other managed stocks, if levels observed in the late 1990s were considered a proxy for unfished biomass. In Area 4, this low biomass manifests in real terms: directed catches plummeted in 2024 and 2025, resulting in coastwide commercial harvests of only 19.7 million pounds—down 18% from 2024. Total mortality in the entire fishery is hitting a 100-year low. As a fisherman, I've never struggled like this to catch my quota; this isn't market-driven—it's depletion. A 10-50% TCEY cut in Area 4 would align with the precautionary principle, allowing biomass to rebuild before it's too late.

2. Overly Optimistic Model Assumptions Underestimate Risks, as History Shows Models Can Be Wrong. The IPHC's stock assessment models rely on assumptions that bias toward optimism, masking the true extent of decline, suggesting that current and further reductions in spawning biomass cannot result in permanent damage to the stock, assuming that recovery in growth and recruitment are essentially

inevitable, and justifying unsustainable limits—yet models have been revised dramatically in the past when proven inaccurate. For example, 15-20 years ago we were repeatedly told that average size was sure to increase as abundance declined. This never happened, and yet the models still seem to believe that it is bound to occur in the foreseeable future. Assumptions around stock-recruitment, Pacific Decadal Oscillation (PDO) influences, and size-at-age trends assume higher productivity and recovery than observed, leading to inflated biomass estimates despite poor recruitment since 2006 and decreasing fish sizes. For instance, the ensemble models project potential upturns under favorable PDO, but recent neutral-to-negative phases and retrospective downward revisions (e.g., 2024 biomass lower than prior forecasts) highlight this over-optimism. Fishermen see the disconnect: while risk tables claim "conservative" fishing, we're experiencing worsening catches, with under-attainment signaling scarcity not captured in the data. This isn't new—IPHC models underwent major overhauls in the early 2000s, incorporating spatial dynamics after underestimating 1990s declines. Similarly, the Atlantic cod disaster saw models overestimate biomass by 200-300%, dismissing fishermen's reports until it was too late. As a non-scientist, I urge humility: incorporate more on-water observations and err precautionary by cutting Area 4 limits 10-50%. Sparse FISS surveys in Area 4 (e.g., no sampling in 4A/4B in 2023-2024, limited in 2025) exacerbate uncertainty, relying on extrapolations that could be as flawed as past errors. While it makes sense to treat fisheries CPUE with skepticism because fishermen can have the ability to find aggregations even as stocks decline—as occurred in Atlantic cod—there is far less reason to believe that declining commercial CPUE in Area 4 is not an indicator of stock decline. A rebuilding plan would mandate sensitivity testing and revisions, ensuring models reflect reality. Taking a closer look at commercial trends in the absence of survey data could help provide clarity.

3. Regional Spawning Biomass Calculations Are Essential, Given Disproportionate Bycatch in the Bering Sea. Coastwide assessments obscure Bering Sea vulnerabilities, where NMFS-managed bycatch far exceeds directed removals, making this eco-region the most susceptible to depletion—necessitating a regional depleted designation and tailored rebuilding. The Bering Sea (Area 4) is a distinct body of water with unique characteristics: a semi-enclosed, productive basin with seasonal ice and upwelling, hosting 24% of the total stock but bearing greater than 80% of Pacific halibut bycatch. Tagging studies have consistently shown that very little of the Bering Sea spawning stock is likely to leave the region and that there is little or no reason to believe that spawners move into the Bering Sea from the Gulf. In 2025, bycatch reached ~4.6 million pounds, dwarfing directed IFQ/CDQ landings (<50% of allocations), and primarily targeting U26 juveniles with low survival, directly impeding recruitment. Regional spawning biomass metrics would reveal this imbalance—current coastwide averaging dilutes the signal, allowing higher southern allocations while Area 4 suffers. Coastwide estimation implies that depleting Bering Sea spawning stock is "OK" as long as it is offset by maintaining spawning biomass farther to the south. This is naïve to the way in which recruitment actually operates as indicated by larval advection and nursery habitat studies that the IPHC and its collaborators have conducted. Deeming the Bering Sea depleted under IPHC protocols (e.g., localized biomass <30% unfished) would enforce MSA-like rebuilding within 10 years, integrating bycatch cuts (e.g., 20-30% PSC reductions) and fixed regional caps to prevent reallocation. As a Bering Sea fisherman, I see bycatch as the biggest threat because most of the removals are from bycatch; but a 10-50% TCEY cut here would offset that loss, protecting our unique ecosystem and ensuring long-term sustainability.

4. Protect Spawning Areas Along the Shelf-Break with Seasonal Closures for All Gears To safeguard reproductive output amid low biomass, the IPHC must collaborate with NMFS and the NPFMC and protect winter spawning areas in deep-water gullies along the Bering Sea shelf-break (200-450m depths) through seasonal closures for directed fishing and NMFS gears, as part of any rebuilding plan. Pacific

halibut spawn primarily December-March, and should be expected to be most concentrated—and perhaps subjected to the highest potential catch rates as a result—at this time of the year. Yet, current directed seasons (March-December) leave this window exposed, risking disruption during peak vulnerability. Propose mandatory closures from mid November to February for directed efforts, extending protections to boost spawning success.

For NMFS trawls and longlines—major bycatch sources—leverage the North Pacific Fishery Management Council (NPFMC) Essential Fish Habitat (EFH) and Habitat Areas of Particular Concern (HAPC) processes to designate these gullies as HAPCs, implementing gear restrictions during spawning months. Council is in the process of its 5-year EFH review and indicated at their December meeting that additional revision of HAPCs is expected to follow. Existing NPFMC closures provide precedent, but targeted HAPCs would minimize ecosystem impacts in this high-bycatch region. Combined with a 10-50% TCEY reduction, these measures would enhance recruitment, addressing the juvenile mortality that's starving the stock of replenishment.

In conclusion, the evidence—from historic low biomass and model flaws to Bering Sea-specific pressures and unprotected spawning—demands action. As fishermen, we're calling for conservatism because we depend on this resource for our future. I respectfully request the IPHC adopt these measures at the 2026 meeting to rebuild and protect Bering Sea halibut.

APPENDIX IV

Remaining comments are available at: https://apps.iphc.int/IPHCcomments/