

IPHC-2018-AM094-PropC12

## REGULATORY PROPOSAL 2018 Long Term Storage of Halibut on Full Time Cruising Vessels

SUBMITTED BY:
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UNITED STATES OF AMERICA
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## EXPLANATORY MEMORANDUM

## For IPHC Regulatory Area(s): All Regulatory Areas

My wife and I live on a boat in Southeast Alaska and cruise west coast waters from California to Alaska (primarily SE Alaska). We have no home or storage facilities other than the vessel we live on. The boat is our domicile. During the summer months we catch, clean, and freeze our halibut to supplement our diet throughout the year. The current regulations require the halibut to be cut into quarters and the skin left on the flesh. While this may make sense for the day fisherman who brings their catch back to port for processing and storage at their home ashore, it is impractical for the long term or full time cruiser. To minimize waste the current regulation below should be revised to permit processing and storage aboard the vessel in usable portion sizes with the skin removed.

## SUGGESTED REGULATORY LANGUAGE

At Section 28 (1) (e)

(e) Halibut in excess of the possession limit in paragraph (1)(c) of this section may be processed (frozen or canned) and possessed on vessels containing processing and full time living facilities that is used as the angler's "Primary Domicile" or vessels that do not contain halibut gear, fishing rods, hand lines, or gaffs. The processed portion of halibut on vessels meeting either of these criteria is exempt from the requirements in section (1) (d).

If necessary the following could also be added or worked into section (1) (e);

A running log must be updated as each fish is caught and maintained on board the vessel with;

Date & Time Caught - Location caught - Overall length of fish - State issued license information of the angler - Corresponding photograph of each fish prior to



processing with date/time stamp – processed fish packages must be marked to correspond to log and photograph.

Once processing has begun on-board all fishing activity for halibut must cease for the remainder of the calendar day.

Proof of "Primary Domicile", "Live-Aboard", or "Extended Cruising" status (which every term you would like to use) could be verified by enforcement officials by accessing license holders mailing address or contacting their homeport marina manager.

Another option would be for the angler to keep a letter prepared by an enforcement officer stating that he or she has reviewed the individual's information (Proof of address, ships log, and or contacted the angler's homeport marina) verifying that he or she meets the decided on requirements for "Primary Domicile" status.