



Stakeholder statements on IPHC Fishery Regulation proposals

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PURPOSE

To provide the Commission with a consolidated document containing 'Statements' from stakeholders submitted to the Commission for its consideration at the 98th Session of the IPHC Annual Meeting (AM098).

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 statements to the Commission for its consideration. Specifically:

“Informal Statements by stakeholders should be submitted as an email to the following address, secretariat@iphc.int, which will then be provided to the Commissioners as Stakeholder Statements at each Session.

DISCUSSION

[Table 1](#) provides a list of the Stakeholder Statements 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. Not all relate to current proposals before the Commission.

Table 1. Statements from stakeholders received by 1200 on 10 December 2021.

Appendix No.	Title and author	Date received
Appendix I	Statement by Andrew Smyth	29 September 2021
Appendix II	Statement by Steve Ramp	14 October 2021
Appendix III	Statement by Sean Daly	22 October 2021

APPENDICES

As listed in [Table 1](#).

APPENDIX I

Statement by Andrew Smyth

IPHC Regulatory Areas that may be affected All

Fishery Sectors • Directed Commercial

Explanatory Memorandum To address commercial bottom trawl Regs.

Suggested Language **Regulatory** Propose to limit commercial bottom trawls only to areas deeper than 400 ft. This would leave the areas used by recreational and charter fishing companies better stocks and encourage economic benefit to a broader segment of the people living in our coastal communities.

APPENDIX II

Statement by Steve Ramp

IPHC Regulatory Areas that may be affected 2C

Fishery Sectors • Recreational

Explanatory Memorandum In recent years, there has been large growth of businesses in Southeast Alaska that rent sportfishing vessels to non-residents, who utilize this arrangement to qualify for more liberal "Non-Guided" bag limits for Halibut. Most of these vessels are smaller than the average charter vessel and, as a result, I believe these anglers focus their halibut harvests in areas close to the communities of Southeast AK. The Sitka Fish and Game Advisory Committee (in which I currently hold the Resident Sport Fishing seat) believes this activity reduces the opportunity for resident anglers to harvest halibut close to our homes and has submitted a State of Alaska Board of Fisheries proposal similar to this one.

Suggested Language **Regulatory** Enact a new regulation that would require any Non-Resident Unguided Angler fishing from a rented vessel in the waters of Halibut Management Area 2C abide by the NOAA halibut bag limits then in effect for Guided Anglers.

APPENDIX III

Statement by Sean Daly

IPHC Regulatory Areas that may be affected All

Fishery Sectors • Non-directed Commercial (bycatch)

Explanatory Memorandum To Whom it May Concern: My name is Sean Daly, I am a United States citizen and a resident of Alaska. I am a father of two boys who one day will be old enough to fish in Alaskan waters. I ask that the commission advocate for expansion of the halibut stock assessment analysis focused on halibut sex ratios to include those of the halibut caught by the A80 fleet, and establish enforcement of quotas for the A80 fleet so that the fishery is immediately closed when the quotas are met or exceeded. I also ask that the council consider revising the bycatch limits to a lower number given declining stocks for numerous saltwater species commonly caught by the A80 fleet as bycatch, and the destructive practice of bottom trawling to ocean habitat on the sea floor including sponges, coral, etc. To date there has been no evidence of any ocean bottom recovery in or near Alaskan waters in the North Pacific after being trawled by bottom trawling vessels, even after decades of research. In my comment, I've included some data on wasted Halibut bycatch from the A80 fleet in Alaska that could have made it to Alaskan residents' freezers, on consumer's tables, or left in the wild to maintain overall fishing stocks and ocean habitat. Statewide Halibut: 3,022,537 lbs. Grand total of above categories is over 24 million pounds of waste. Note that the above categories are just the "Hot Topic" bycatch categories. If you go through and tally total bycatch for ALL species, it comes out to close to 100 million pounds per year. Approximately 10% of total halibut and salmon bycatch is kept and donated each year. Historically, approximately 70% of that donated halibut and salmon goes out-of-state. Thank you for your time!

Suggested Regulatory Language N/A