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**REGULATORY PROPOSAL 2018**  
**Exemption from Processing Limitations for Recreational Live-Aboard Vessels**

**SUBMITTED BY:**  
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RECREATIONAL FISHERMAN  
UNITED STATES OF AMERICA  
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**EXPLANATORY MEMORANDUM**

**For IPHC Regulatory Area(s): All AK Regulatory Areas**

My wife and I spend 3 months in the summer on our boat in SE Alaska (Area 2C). While there, we live on the boat, usually away from a marina or town. We also participate in some of the fishing opportunities while there. We have facilities onboard to process, pack and freeze fish for preservation for our personal use.

The current IPHC regulation prevents personal use of halibut on the boat, even though we are living there, and prevents the proper preservation of the catch for future use.

To comply with the current regulations, we must maintain halibut in 4 filets and 2 cheeks with skin on. This prevents removing a portion of a filet for personal consumption while on the boat. It further prevents proper processing for future use (skin on tends to taint the flesh over time) and "meal size" is approximately 1 lb. We are currently at home trying to process halibut, frozen in 4 filets/fish into "meal size", skinned packages. I'm sure the partial thawing/refreezing of this process will degrade the halibut.

**SUGGESTED REGULATORY LANGUAGE**

In the interest of conservation, proper use and preservation of the halibut, I ask that Section 28(1)(d) be revised to read:

"No person shall possess on board a vessel, including charter vessels and pleasure craft used for fishing, halibut that have been filleted, mutilated or otherwise disfigured in any manner except that each halibut may be cut into no more than 2 ventral pieces, 2 dorsal pieces and 2 cheek pieces, with skin on all pieces. *Except pleasure vessels with live aboard accommodations and processing facilities, may process, preserve, maintain and transport halibut on board.*"