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## Stakeholder comments on IPHC Fishery Regulations or published regulatory proposals

PREPARED BY: IPHC SECRETARIAT (B. HUTNICZAK; 27 OCTOBER 2023)

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### 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 99<sup>th</sup> Session of the IPHC Interim Meeting (IM099).

### 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 noon on 3 October 2023.

Appendix No.	Title and author	Date received
<a href="#">Appendix I</a>	Fabian Grutter	3 October 2023
<a href="#">Appendix II</a>	Shawn McManus, Deep Sea Fishermen’s Union of the Pacific	25 October 2023
<a href="#">Appendix III</a>	TBD	

### APPENDICES


As listed in [Table 1](#).

## APPENDIX I

Statement by Fabian Grutter

Section of IPHC Fishery NA  
Regulations or regulatory  
proposal reference the  
comment will refer to

Submitted comment

<p><b>Fabian Grutter</b> 1302 Sawmill Cr. Rd. #40 Sitka, AK 99835 907-752-0100</p>	<p><b>RECEIVED</b> OCT 12 2023 <b>IPHC</b></p>
<p>9/20/2023</p>	
<p><b>International Pacific Halibut Commission</b> 2320 West Commodore Way, STE 300 Seattle, WA 98199</p>	
<p>Dear Halibut Commission,</p>	
<p>I am writing to you today because of my concern for the serious decline that I am seeing in the halibut population. Every summer I see more out of state boats, faster charter boats, and more illegal activity associated with the substance Halibut harvest and the excessively high legal catch limits. We need more ADF&amp;G and NOAA enforcement behind this; especially in the outer reach areas such as the back side of Baranoff Island in Sitka.</p>	
<p>I am a lifelong resident of Sitka Alaska. My father and I purchased halibut quota in the mid 1990's. I have fished out of a 19' skiff catching 10,000 pounds of halibut every summer. As I slowly purchased more quota in the early 2000's, I grew my boat size to a 34' gillnetter. At one time my quota was 15,000 Lbs., and it is now down to 7,000. This is a serious reduction due to the decline in halibut.</p>	
<p>There are a few things I would like to propose to the Halibut commission. First, higher fines for the sport charter fisherman, subsistence, personal use, and sport residents. Second, we need to lower the resident daily quota for halibut from 2 to 1. The subsistence quota should be 3 halibut on a boat at a time with a limit of 5 halibut per person per year.</p>	
<p>If something is not done soon, there is not going to be many more halibut left. Halibut is a slow growing fish and does not quickly replenish its population. Now is our time to act.</p>	
<p>Thank you for listening to my testimony and proposal. Seeing the declines in halibut since I started fishing in the 1990's is a huge concern and needs to be addressed.</p>	
<p>Sincerely,  Fabian Grutter</p>	

## APPENDIX II

### Statement by Shawn McManus, Deep Sea Fishermen’s Union of the Pacific

Section of IPHC Fishery Regulations or regulatory proposal reference the comment will refer to

NA

Submitted comment

In the event that a FISS is not conducted in an IPHC Regulatory Area(s), the TAC for the un-surveyed Regulatory Area(s) shall not be increased using extrapolated historical FISS data for the following fishing season. For example, in 2021 there were no FISS conducted in any of the Area 4 Regulatory Areas. Yet, despite the lack of current FISS in those Regulatory Areas, the TAC was increased in many of those Areas using extrapolated FISS data for the 2022 fishing season. Those same Regulatory Areas are again lacking FISS for 2023.

We are concerned that the lack of annual FISS data does not provide the critical up to date data necessary to increase and effectively manage a Regulatory Area(s) TAC. In fact, from a conservation and sustainability standpoint, without the annual FISS data, we are hardly comfortable with a TAC status quo for the affected Regulatory Area(s).

The abovementioned problem is seen as a harvest control rule.

“No IPHC Regulatory Area shall see an increase in TAC without an annual FISS which indicates the action of raising the TAC is warranted”

## APPENDIX III

### Statement by xx

Section of IPHC Fishery Regulations or regulatory proposal reference the comment will refer to

Submitted comment