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INTERNATIONAL PACIFIC HALIBUT COMMISSION

ESTABLISHED BY A CONVENTION BETWEEN CANADA

AND THE UNITED STATES OF AMERICA

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EL2026002
 26 January 2026

Angel Drobnić

Chairperson, North Pacific Fishery Management Council (NPFMC)

Send via email: adrobnić@apicda.com

CC: Diana Evans, NPFMC Executive Director

Sent via email: devans@npsc.org

RE: Fishery Regulation proposals submitted to the IPHC:

IPHC-2026-AM102-PropC1 – that proposed an unguided recreational sector Pacific halibut daily bag limit reduction from two (2) fish to one (1) fish for all IPHC Regulatory Areas in Alaska.

IPHC-2026-AM102-PropC3 – that aimed to ensure that any proposed reduction to the unguided recreational Pacific halibut daily bag limit in Alaska is supported by region-specific biological and socio-economic information provided by the USA, and include analyses developed in cooperation with the Alaska Department of Fish and Game, prior to adoption by the Commission.

Dear Ms. Drobnić,

On behalf of the International Pacific Halibut Commission (IPHC), I am writing to bring to the attention of the North Pacific Fishery Management Council (NPFMC) Regulation Proposals **IPHC-2026-AM102-PropC1** and **IPHC-2026-AM102-PropC3** that were submitted for consideration at the 102nd Session of the IPHC Annual Meeting (AM102).

The Commission requested that the IPHC Secretariat communicate the details of these proposals to the NPFMC for awareness and consideration. The Commission would like to inform the Council that the expansion of the unguided recreational harvest in Alaska prompted considerable feedback from IPHC stakeholders. In 2025 the final unguided harvest and removal estimate in IPHC Regulatory Area 2C was 1.445 Mlb, compared to the preliminary removal estimate of 0.992 Mlb, and the increase is understood to be driven by growing harvest by anglers fishing from unguided rental vessels. This poses both management and allocative concerns, particularly in light of the current low abundance of the Pacific halibut resource. Given the Council's important role in these matters, the Council may wish to consider measures to improve management and catch data collection for the unguided recreational sector of the Pacific halibut fishery.

Please do not hesitate to contact us if you require any further information.

Yours sincerely,

David T. Wilson

David T. Wilson, Ph.D.,
Executive Director
International Pacific Halibut Commission

CC:

Mark Waddell, IPHC Chairperson
Jon Kurland, IPHC Vice-Chairperson;
IPHC Commissioners Robert Alverson, Richard Yamada, Neil Davis, Peter Degreef.

Encl.

IPHC-2026-AM102-PropC1
IPHC-2026-AM102-PropC3



IPHC Fishery Regulations:

Recreational (Sport) Fishing for Pacific Halibut - IPHC Regulatory Areas 2C, 3A, 3B, 4A, 4B, 4C, 4D, 4E (Sect. 28) – unguided sector bag limit

PREPARED BY: PER ODEGAARD (FISHING VESSEL OWNERS' ASSOCIATION) (15 DECEMBER 2025)

Directed Commercial Recreational Subsistence Non-directed commercial All
 All Regulatory Areas All Alaska Regulatory Areas All U.S. Regulatory Areas
 2A 2B 2C 3A 3B 4A 4B 4CDE

PURPOSE

To propose unguided recreational sector Pacific halibut daily bag limit reduction from two (2) fish to one (1) fish for all IPHC Regulatory Areas in Alaska.

EXPLANATORY MEMORANDUM

This regulatory proposal document, along with the proposed regulatory language, have been prepared based on additional communication with the Fishing Vessel Owners' Association.

An assessment of the impacts of decreasing the unguided recreational bag limit in Alaska requires assistance from the Alaska Department of Fish and Game. Any information received regarding the effects of this proposal will be incorporated into subsequent revisions of this document.

PROPOSED REGULATORY LANGUAGE

This proposal revises the general daily bag limit applicable to the Alaska recreational fishery from two (2) fish to one (1) fish for the unguided sector.

The proposed regulatory language also decouples the general rule from both more restrictive and alternative limits and instead explicitly subordinates it to specified subsections and applicable Federal regulations. This approach is intended to preserve the separate regulatory framework applicable to the guided (charter) sector.

28. Recreational (Sport) Fishing for Pacific Halibut—IPHC Regulatory Areas 2C, 3A, 3B, 4A, 4B, 4C, 4D, 4E

- (1) In Convention waters in and off Alaska:^{8, 9}
 - (a) the recreational (sport) fishing season is from 1 February to 31 December;
 - (b) the daily bag limit is ~~two~~ one (1) Pacific halibut of any size per day per person ~~unless a more restrictive bag limit applies in Commission regulations or except as provided in paragraphs (2) and (3) of this Section and in~~ Federal regulations at 50 CFR 300.65;

[...]

⁸ NOAA Fisheries could implement more restrictive regulations for the recreational (sport) fishery or components of it, therefore, anglers are advised to check the current Federal or State regulations prior to fishing.

⁹ Under regulations promulgated by NOAA Fisheries at 50 CFR 300.66(u), it is unlawful for any person to be a charter vessel guide of a charter vessel on which one or more charter vessel anglers are catching and retaining Pacific halibut in both IPHC Regulatory Areas 2C and 3A during one charter vessel fishing trip.

RECOMMENDATIONS

That the Commission:

- 1) **NOTE** regulatory proposal IPHC-2026-AM102-PropC1 that proposes unguided recreational sector Pacific halibut daily bag limit reduction from two (2) fish to one (1) fish for all IPHC Regulatory Areas in Alaska.

APPENDICES

Appendix A: Letter from the Fishing Vessel Owner's Association.

FISHING VESSEL OWNERS' ASSOCIATION INCORPORATED

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SEATTLE, WASHINGTON 98199-1290
PHONE (206) 284-4720 • FAX (206) 283-3341

SINCE 1914

Director David Wilson
International Pacific Halibut Commission
2320 W. Commodore Way, Suite 300
Seattle, WA 98199-1287

December 15, 2025

RE: Proposal of regulatory changes for 2026

Director Wilson,

The members of the Fishing Vessel Owners' Association (FVOA) of Seattle request that the Commission consider amending the sports unguided bag limit from 2 fish to 1 fish for all IPHC regulatory areas off Alaska for the 2026 season. We request the Commission attempt to determine how much additional poundage is caught with a 2 fish bag limit versus a 1 fish bag limit. Due to the continued decline of the halibut resource, FVOA members are expecting reduced commercial harvest limits for 2026 along with reduction to the guided sports industry. It is time that all harvesting sectors share in rebuilding the halibut resource.

Signed,



Per Odegaard
Fishing Vessel Owners Association



IPHC Fishery Regulations:

Recreational (Sport) Fishing for Pacific Halibut - IPHC Regulatory Areas 2C, 3A, 3B, 4A, 4B, 4C, 4D, 4E (Sect. 28) – supporting information for unguided sector bag limit

PREPARED BY: CHANCE MILLER (SEWARD CHARTER BOAT ASSOCIATION, HOMER CHARTER BOAT ASSOCIATION)
(19 DECEMBER 2025)

Directed Commercial Recreational Subsistence Non-directed commercial All

All Regulatory Areas All Alaska Regulatory Areas All U.S. Regulatory Areas

2A 2B 2C 3A 3B 4A 4B 4CDE

PURPOSE

To ensure that any proposed reduction to the unguided recreational Pacific halibut daily bag limit in Alaska is supported by region-specific biological and socio-economic information provided by the United States, and include analyses developed in cooperation with the Alaska Department of Fish and Game, prior to adoption by the Commission.

EXPLANATORY MEMORANDUM

Recent stakeholder submissions to the Commission propose a uniform statewide reduction to the unguided recreational daily bag limit for Pacific halibut in Alaska. Although such proposals may stem from legitimate conservation concerns, unguided recreational participation varies substantially across Alaska's IPHC regulatory areas. The biological, social, and economic impacts of reductions will not be uniform across all regions.

Alaska's Pacific halibut regulatory areas are characterized by significant differences in geographic scale, fish abundance, population density, and coastal access between Areas 2C, 3A, 3B, and 4A–4E. Among the large differences are rates of resident and non-resident participation, road-system access and small-boat coastal participation. There are distinct patterns of recreational effort; and existing management frameworks that interact with unguided effort.

Because of these regional differences, a statewide bag-limit reduction will have significant and disproportionate consequences that cannot be adequately evaluated without region-specific biological and socio-economic assessment. At this time, no such region-specific analysis has been provided to the Commission by the United States.

Recreational participants in the Pacific halibut fishery do not have formal representation within the IPHC's decision-making structure, and unguided recreational participants are not represented through dedicated institutional mechanisms within the IPHC's decision-making framework. Decisions affecting domestic recreational harvest measures made without sufficient biological and socio-economic data or without the input of the Alaska Department of Fish and Game risk being made without the benefit of a forum specifically designed to adequately evaluate their overall impacts.

This concern is not novel. As documented in IPHC Technical Report No. 26, the United States has maintained a long-standing policy position that recommendations involving domestic allocation of the halibut resource should be developed through the appropriate Regional Fishery Management Council, where public process, stakeholder representation, and analytical review are explicitly required.

Absent such procedural guardrails, the Commission risks establishing domestic recreational measures without prior Council analysis, while simultaneously limiting future opportunities to evaluate, refine, or reverse those measures due to the absence of a formal analytical record. Establishing these guidelines before considering changes to unguided recreational limits helps ensure that any future actions are informed, reversible, and consistent with established domestic governance frameworks.

While agencies and stakeholder organizations may provide input, the dispersed and non-commercial nature of the recreational sector means that its impacts are often conveyed indirectly, underscoring the importance of explicit procedural guidance when considering changes that affect unguided participants.

The intent of this proposal is not to preclude Commission action on unguided recreational measures. Rather, it is to ensure that any future action is grounded in regionally appropriate analyses developed through domestic processes, including information prepared by the Alaska Department of Fish and Game (ADF&G) and other U.S. agencies. Incorporating these analyses will help ensure that regulatory changes are transparent, equitable, biologically defensible, and consistent with the Commission's long-standing reliance on domestic scientific and management processes.

PROPOSED REGULATORY LANGUAGE

Add the following paragraph to Section 28:

(4) In considering any reduction to the daily bag limit for unguided recreational (sport) fishing in Convention waters off Alaska, the Commission shall take into account region-specific biological and socio-economic data provided by the United States, including analyses developed in cooperation with the Alaska Department of Fish and Game. Any such reduction should be limited in scope to those regulatory areas for which region-specific analysis demonstrates a clear biological or socio-economic basis for action. For clarity, this provision applies only to actions that further restrict unguided recreational bag limits and is not intended to limit the Commission's ability to relax or remove such restrictions.

RECOMMENDATIONS

That the Commission:

- 1) **NOTE** regulatory proposal IPHC-2026-AM102-PropC3, which provides that proposed reduction to the unguided recreational Pacific halibut daily bag limit in Alaska is supported by region-specific biological and socio-economic information provided by the United States, and include analyses developed in cooperation with the Alaska Department of Fish and Game, prior to adoption by the Commission.