

Bob and Lois Cameron

Whitehorse, Yukon
Canada

International Pacific Halibut Commission
Fax 206-632-2983

007 15 2008

Dear Sir/Madam:

October 15, 2008

We are Yukon residents who operate a slow (7-knot), live-aboard boat registered in Skagway, for the purpose of pleasure cruising the waters of S.E. Alaska. As fellow northerners, we have a great appreciation for the pristine beauty, the wildlife viewing, and the excellent fishing of both the Yukon and Alaska.

Our concern is the apparent change in the interpretation and enforcement of your fishing regulations, as they pertain to the halibut fishery. We have heard that the change was triggered by a concern about the fast boats that may have been harvesting an unknown amount of halibut, and scooting back to Skagway with their unrecorded catch. This we don't condone, and we recognize that it is an abuse of the fishery, if this is indeed happening.

However, many of us cruise your waters with slow trawler style live-aboards, away from our home port of Skagway for several weeks at a time. During that time we fish for various species, including halibut. As halibut are typically too large to consume in one or two meals, and we are not returning home for some weeks, we "process" the fish by cutting and wrapping it in meal-size portions, and storing it in our small, on-board freezer. This past summer has seen this practice deemed illegal, and punished accordingly, even though the Regulations state that processed fish is not counted as part of the Possession Limit.

We understand your interest in being able to identify the number of fish on board a vessel, but the requirement that we retain the four fillets intact with skin attached is impractical, unworkable, and, in the case of having to keep them that way for the duration of several weeks, can lead to difficulty in later processing them to meal-size portions. Having to thaw or partially thaw the large fillets in order to skin and wrap them separately in smaller portions,

- 2 -

can actually lead to the degradation of the meat, and/or loss of quantities of meat.

If you are open to suggestions, we would like to propose the following, in order to achieve your objective of being able to quantify the amount of fish on vessels, and at the same time, enable us to carry our processed fish on board for the duration of our cruise:

1. Require us to retain the fillets of the legal possession limit (currently four), intact with the skin attached, until inspected by a fisheries officer, or other appointee.
2. Upon inspection and weighing of the fillets, have the inspecting officer issue a certificate attesting to the quantity of fish inspected (number and total weight), allowing us to then retain it on board in a "processed" state.
3. Upon subsequent fishery inspections of a vessel, the operator must then be able to demonstrate that he/she has no more fish on board than the legal Possession Limit in an intact state, and processed fish previously certificated (the quantity being confirmable by weight).
4. This would enable us to check into a convenient port such as Hoonah or Juneau, have our unprocessed fish inspected, quantified and certified, and then carry on with our multi-week cruise with our fish properly processed. At the same time it enables your department to keep an accurate surveillance of fish being taken.
(Note - we refer to Hoonah and Juneau as "convenient" ports, as they are usually within a few hours of the fishing in Icy Strait. To have to run all the way back to Skagway to dispose of unprocessed fish is a 2-day round trip in favourable conditions, with our 7 knot boats.)

We hope you will give this proposal due consideration, in order to put some measure of practicality in the halibut fishing regulations.

Yours truly,

Bob and Lois Cameron