

United States Senate

WASHINGTON, DC 20510

January 21, 2026

The Honorable Neil Jacobs
Under Secretary of Commerce for Oceans and Atmosphere
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

Dear Under Secretary Jacobs:

This week at the International Pacific Halibut Commission's (IPHC) 102nd Annual Meeting, the Commissioners will be considering a regulatory proposal (IPHC-2026-AM102-PropC1¹) submitted by a trade association from Seattle, Washington. This regulatory proposal seeks to reduce the unguided recreational sector's Pacific halibut daily bag limit from two to one fish for all of Alaska's IPHC Regulatory Areas. Fisheries management for Pacific halibut stocks is a complex and iterative process that includes specific management authorities for this resource that spans several user groups. Given the gravity of this proposal, and to avoid negatively impacting a specific sector without full and proper regulatory consideration, I am writing to express my deep concern.

The IPHC is an international organization that was established by a 1923 Convention between Canada and the United States to bilaterally manage and conserve Pacific halibut stocks in the North Pacific, specifically waters off the coasts of the U.S. Pacific Northwest, Alaska, and British Columbia. The Northern Pacific Halibut Act of 1982² serves as the legal framework for implementing the goals of the 1923 Convention by: ensuring the U.S. has representation on the Commission; giving the U.S. Secretary of State in consultation with the U.S. Secretary of Commerce the authority to accept or reject regulatory recommendations from the IPHC; and **providing the U.S. Regional Fishery Management Councils with the authority to develop U.S. specific regulations.** The IPHC uses scientific studies and harvest data to set the total allowable catch of Pacific halibut in their Regulatory Areas, then Alaska's Regional Fishery Management Council, the North Pacific Fishery Management Council (NPFMC), is responsible for providing the federal regulatory recommendations for harvest limits that get allocated across the commercial, subsistence, and charter sectors in our domestic waters. The National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS) is responsible for implementing and enforcing the NPFMC's recommended regulations.

¹ International Pacific Halibut Commission (IPHC). (2025, December 19). *IPHC Fishery Regulations: Proposals for the 2025-26 process.* <https://www.iphc.int/uploads/2025/12/IPHC-2026-AM102-15-IPHC-FR-Proposals-for-the-2025-26-process.pdf>

² Northern Pacific Halibut Act of 1982. Public Law No: 97-176. 96 Stat. 78 (1982).
<https://www.congress.gov/bill/97th-congress/senate-bill/2244/text>

Alaska is home to vibrant commercial, subsistence, recreational, and charter fisheries. Pacific halibut harvested off Alaska's coast is a shared resource that goes through this extensive and precautionary management review to ensure careful conservation across these user groups. This proposal to reduce Alaska's unguided charter sector's bag limit from two fish to one may sound minor, however, I cannot overstate the severe and meaningful impacts to Alaskans who harvest Pacific halibut, especially those from our coastal communities that have relied on this resource for decades. In recognition of this, I strongly oppose this proposal and note that its consideration at the IPHC is inconsistent with the Northern Pacific Halibut Act of 1982, which places the NPFMC in charge of Alaska's domestic allocation decisions. There, at the NPFMC, this proposal will be given full consideration in an open and transparent process, which accounts for the social, economic, and cultural viability of Alaska's fisheries.

If this proposal moves forward at the IPHC Annual Meeting, I am strongly concerned of not only the extreme effect on Alaskans, but also the negative precedent that does not align with our U.S. fisheries management goals or the goals and objectives set forth by the IPHC. It is not too late to course-correct and adopt the approach to have this proposal reviewed by the NPFMC.

Given the nature of these concerns, I would appreciate an update on the result of this matter at the conclusion of the IPHC Annual Meeting. Thank you for your time and attention to this matter.

Sincerely,



DAN SULLIVAN
United States Senator