

Regional Delivery Exemption Report

December 2, 2014

This Regional Delivery Exemption Report is submitted by Inter-Cooperative Exchange (“IFQ Holder”) to fulfill the requirements of 50 C.F.R § 680.4(p)(5) (the “Reporting Requirements”) with respect to the 2013-2014 crab fishing year. The report below addresses each element of the Reporting Requirements.

(A) The amount of individual fishing quota (IFQ), if any, set aside to reduce the need for, and the amount of, an exemption.

No specific amount of IFQ was set aside to reduce the need for and the amount of an exemption. However, IFQ Holder followed a “virtual reserve pool” procedure under which North region Opilio deliveries are scheduled and made on a basis that reduces the risk that North region ice conditions cause Opilio IFQ and individual processing quota (IPQ) to be stranded, and certain amounts of South Region IFQ and IPQ are reserved to cover frustrated North region deliveries. That procedure is as follows:

1. As long as the risks associated with delivering in the North region remain acceptable, reserve pool participants give North region deliveries priority over South region deliveries.

2. If the risks associated with delivering in the North region become unacceptable, South region IFQ is used first to cover any frustrated North region deliveries, and then used as follows:

2.1 Immediately following the suspension of North Region deliveries, IFQ Holder assigns South region IFQ to a “reserve pool” in amounts approximating the remaining balance to be delivered to each North region IPQ holder with whom IFQ Holder is matched. When all South region IFQ in excess of an IPQ holder’s share of the reserve pool has been delivered, if the North region is still closed to deliveries, IFQ Holder and that IPQ holder may, by mutual agreement, either (i) use that IPQ holder’s share of the South region reserve pool until it has been exhausted or the North region has been re-opened for deliveries, and/or (ii) initiate a request for a Regional Landing Requirement exemption, and if it is approved, may deliver North region designated IFQ to the South region for processing.

2.2 If the North region re-opens during the Opilio season, such that there is a reasonable likelihood of delivering a substantial amount of IFQ in the North region prior to season closure, and IFQ Holder has remaining North region IFQ, IFQ Holder will (in consultation with North region IPQ holders) prioritize North region deliveries over South region deliveries. If IFQ Holder and an IPQ holder with whom the IFQ Holder is matched have been delivering North region IFQ in the South region under an exemption pending such re-opening, they may initiate compensatory landings in the North region.

(B) The mitigation measures employed before submitting an in-season notice.

No in-season notice of exemption was filed during the 2013-2014 crab fishing year. The primary mitigation measure employed was an early Opilio fishery start date.

In late October, three vessels conducted a test fishery using APICDA CDQ. The Opilio crab they harvested was delivered to Trident Seafoods for processing. Trident determined the crab was not yet in marketable condition, and deliveries were suspended.

By early November, test fishery information suggested that deliveries in December would be marketable, and Trident notified the fleet accordingly. Trident began accepting deliveries of Opilio crab at its St. Paul plant in early December, and seven vessels harvesting crab under IFQ Holder permits made 18 deliveries to St. Paul between December 8 and December 31, 2013, in the total amount of 2,282,157 pounds.

Deliveries continued in January 2014, per usual practice. IFQ Holder vessels delivered 5,055,899 pounds of Opilio crab to the St. Paul plant during that month. Deliveries in the North region were completed March 4, 2014.

(C) The number of times exemptions were requested and used.

As stated above, no exemption was requested or used during the 2013-2014 crab fishing year.

(D) The arrangements for any compensatory deliveries, including all compensatory deliveries made during the crab fishing year and any outstanding compensatory delivery obligations for the following crab fishing year.

Because no crab was delivered outside of its designated region during the 2013-2014 crab fishing year, no compensatory delivery arrangements were necessary.

(E) Whether the exemption was necessary.

No exemption was necessary for the 2013-2014 crab fishing year.

(F) Any impacts resulting from the exemption on the fishery participants and communities that signed the preseason application.

Because no exemption was requested or used during the 2013-2014 crab fishing year, there were no related impacts on fishery participants and communities that signed the preseason application.