



**C5 Final Action:
Fishing between partial offloads in the BSAI
Crab Rationalization Program**

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PROPOSED FEDERAL REGULATORY AMENDMENT

- §680.7(b)(3) states a prohibition on “resum[ing] fishing for CR crab or tak[ing] CR crab on board a vessel once a landing has commenced and until all CR crab are landed, unless fishing in the Western Aleutian Islands golden king crab fishery”
- Currently allowed to conduct partial deliveries to multiple processors, BUT
- **Cannot fish between deliveries**



Offloading crab, NPFMC

HISTORY OF ACTION

Proposal from
PNCIAC
APRIL 2018

Discussion paper
FEBRUARY 2019

Initial Review
Draft
JUNE 2019

Final Action
DECEMBER
2019

CONTEXT

- Prohibition original to the CR Program
- Concern that partial offloads would allow illegal discards
- Greatly simplifies accounting process

CONTEXT

- Exception for the Western Aleutian Islands golden king crab fishery in 2016 to help promote live markets
- Financial incentives to offload quickly and with minimum deadloss, so unlikely to be a common practice

PURPOSE OF ACTION



Crab pots, NPFMC

- Proposed by crab harvesters to provide operational flexibility for rare circumstances related to economics or efficiency of the harvesting

For full purpose and need see
Section 2.2, page 12

ALTERNATIVES

- **Alternative 1 (No Action):** Status quo
- **Alternative 2:** Remove the prohibition

Option: In the event of a partial offload within a fishing trip, only entire tank crab contents may be offloaded. (Any tank started for offload must be fully offloaded.)

For full alternatives see
Section 2.3, page 12

PRELIMINARY PREFERRED ALTERNATIVE

- **Alternative 2:** Remove the prohibition on fishing between partial deliveries

For full alternatives see
Section 2.3, page 12

UPDATES TO THE ANALYSIS

- Expanded discussion on the potential for redistribution of B and C shares as requested by the SSC (Section 2.7.2.1 – page 43)
- Expanded discussion about the potential for live crab markets and the interaction with this action (Section 2.7.2.3 – page 45)
- Inclusion of net benefits to the Nation, consideration of National Standards, the Council's Ecosystem vision statement based on the Council's PPA (Sections 2.9, 3.1, and 3.2)
- Description of impacts on subsistence (included in Section 3.1 and 3.2 – page 55)

SUMMARY OF EXISTING CONDITIONS

Section 2.6, pages 13-39



Setting pots, NPFMC

ANALYSIS OF IMPACTS

Section 2.7, pages 40-52



Offloading crab, NPFMC

SCOPE OF CHANGE



Offloading crab, NPFMC

- Limited scope of impacts expected
- Only useful in some circumstances
- No regulatory constraints to *ensure* scope remains limited

POTENTIAL IMPACTS ON HARVESTERS

- Increased flexibility
- Option to use when beneficial (e.g. ice, weather, opportunistic deliveries, split region delivery, ect.)
- Several anecdotes where this regulation has become problematic for harvesters (harvesters and NOAA OLE)



Vessels delivering to St. Paul, NPFMC

POTENTIAL IMPACTS ON PROCESSORS AND COMMUNITIES

- With the limited use expected, scope of impacts to processors and communities also expected to be limited



Dutch Harbor/ Unalaska, NPFMC

POTENTIAL CHANGES THAT COULD IMPACT PROCESSORS AND COMMUNITIES



City of St. Paul, Photo credit: M.Fina

- Potential increase of crab deadloss
 - Not a conservation concern: accounted for through IFQ/ IPQ
 - Economic concern for harvesters and processors
 - Situations where cost-savings are not passed on to the processor

POTENTIAL CHANGES THAT COULD IMPACT PROCESSORS AND COMMUNITIES



City of St. Paul, Photo credit: M.Fina

- Potential change in where B/C and CPO shares are processed.
 - Limited by business arrangements
 - Intended to be flexible
- Could support live markets for crab if they develop AND there is no additional frozen storage

MANAGEMENT AND ENFORCEMENT - FEDERAL

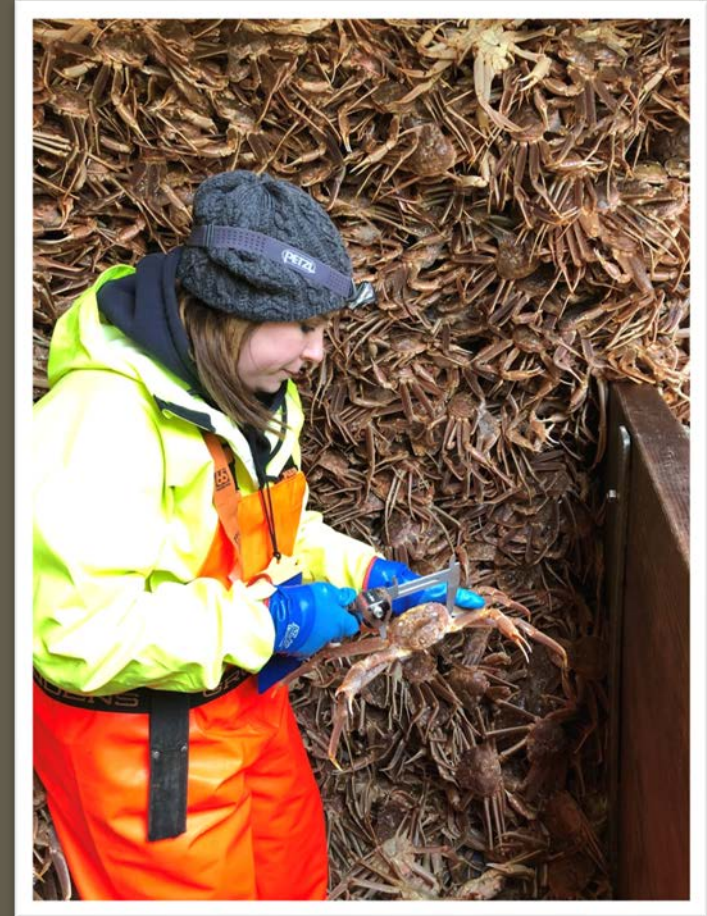
- Minor regulatory change
- Subject to CR Program cost recovery

MANAGEMENT AND ENFORCEMENT - STATE

- Primary accounting concern is editing the fish tickets for catch and effort by statistical area
- Fishing in between partial offloads complicates this process
- *Will* still know how much crab is caught and which stat areas are fished
- *Will* still know the proportion of catch and effort by statistical area for both trips together
- Difficulty is splitting out the proportion of catch and effort by stat area for each landing (don't know how much crab is left onboard)

MANAGEMENT AND ENFORCEMENT - STATE

- Changes to ADF&G dockside sampling and Observer Program to account for a partial offload
- Changes in enforcement protocol for dealing with harvest of illegal crab (legal tally)
- Increased communication between harvesters using this flexibility and ADF&G



Size frequency sampling, NPFMC

OTHER CONSIDERATIONS

- National Standards – Section 3.1, page 55
- Ecosystem Vision Statement – Section 3.2, page 57

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EXTRA SLIDES

Crab Partial Offloads – CPT discussion

- Some concern about the loss resolution in catch data.
- Current assessments do not include spatial harvest, but loss of spatial resolution may preclude future model development.
- If use is limited, as expected, then effects on catch data are likely to be minor.
- Limiting partial offloads to only one before a full offload, or requiring that partial offload to empty a subset of holding tanks would mitigate the concerns.
- CPT discussed potential advantages of an EFP to work out practical aspects of the rule change.

Crab Fishery TAC - 10% for CDQ & Adak = IFQ allocation

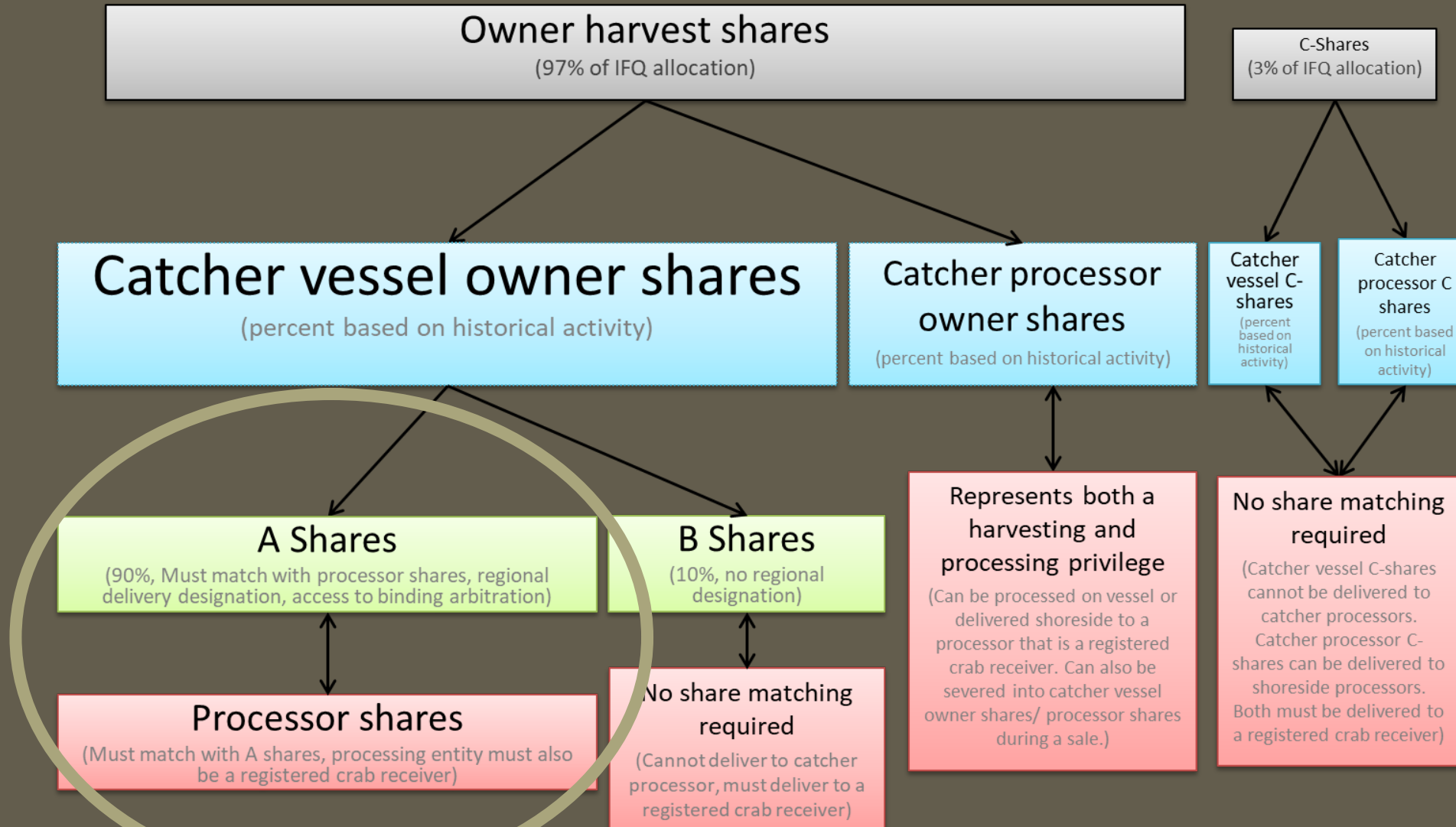


Figure 1, Page 14

Crab QS Fishery	North Region	South Region	West Region	Undesignated Region
BBR	x	x		
BSS	x	x		
EBT				x
WBT				x
PIK	x			
SMB	x	x		
EAG	x	x		
WAG			x	x
WAI		x		

OPTION TO ALTERNATIVE 2

Option: In the event of a partial offload within a fishing trip, only entire tank crab contents may be offloaded. (Any tank started for offload must be fully offloaded.)

- Intent is keeping crab from separate partial trips would help to accurately edit the fish ticket.

OPTION TO ALTERNATIVE 2

- Full tank offloads may minimize deadloss
- Could prevent a vessel from doing a partial offload
 - Emergency situation or Regional QS limitation
- Difficult to enforce
- Could improve fish ticket editing

SAFETY AT SEA BACKGROUND

- Safety under the BSAI crab rationalization Program
- Stability concerns for pot vessels
- Current enforcement response to safety concerns

Section 2.6.4, pages 38-40



Stacking pots, NPFMC

POTENTIAL IMPACTS ON SAFETY AT SEA

- Increased *fishing* flexibility; more opportunity to *fish*
- Related to dangerous conditions, but unlikely to address *purely* safety concerns
- Improved efficiency in bad situations (lost pots/lost time)
- Even with this additional flexibility, as always, captains should use their rational judgment about risk

HARVESTING SECTOR BACKGROUND

- Data and information on the harvesting sector includes:
 - TAC for CR fisheries
 - Vessel counts
 - Total weight and ex vessel rev
 - CPUE
 - Rates of deadloss
 - Reported numbers of lots pots
 - Trip and landing statistics

PROCESSOR AND COMMUNITY BACKGROUND

- Focus on processors and communities associated with BSAI crab landings (where B and C shares are being landed)
- Akutan, Dutch Harbor/ Unalaska, King Cove, Kodiak, St Paul, Adak, Naknek
- Context on vessel capacity and the delivery process