

2/17/77

Mr. Chairman, Members of the Council

Thank you for the opportunity to express some points-of-view on the minimum size for C. bairdi tanner crab in the Bering Sea. Mr. Szabo's most excellent presentation yesterday did not, however, fully describe some other perspectives of the problem.

Item 1) The need for a unified minimum size for both domestic and foreign-caught tanner crab in the Bering Sea is not a great difficulty, because an equitable standard of management for both the domestic and foreign effort in this presently shared fishery is to be expected.

Item 2) A scientifically determined minimum size is an eventuality in any developed fishery, and such a determination should be just that, scientific in justification and not economic. The present 140 mm (5.5") size adopted last April-- and still in force--is still in doubt as to its scientific justification. The doubtful size range varies from 122 mm (4.8") to 140 mm (5.5"). The scientific determination for arriving at these numbers is not within range of my competence. The timely imposition of a minimum size will be needed before fishing mortality imposes a high stress on the mature male population, as was apparently the case in the Prince William Sound tanner fishery cited by Nick Szabo yesterday.

Item 3) However, the necessity for the immediate imposition of a 5.5" minimum size on tanners in the Bering Sea is not very clear. This fishery is yet in an early domestic development stage, with INPFC data, a high average size imposed by the processors, 2.4 to 2.5 lb minimum. The average size for domestic caught C. bairdi in 1976 was 6.06" (154 mm) carapace width. Even the Japanese catch average size 5.9" (149.8mm), as cited by U.S. observer data. In respect to size then, the immediate need for a 5.5" minimum size on C. bairdi was not provoked by the fishermen substantially harvesting in or below a marginal or critical size range.

Item 4) The domestic tanner fishery in the Bering Sea is at this time "on the spot." We must prove out the claims made for a very substantially increased volume of harvest in 1977. The price level is still marginal, and to attempt

to double last year's production of 22,000,000 lbs. is a large order indeed. However, the legal requirement of 5.5" imposes an additional economic tax of increased labor to measure a large portion of the crab dumped from the spot in order to insure keeping only above-legal, of which only a few below 5.5" could bring down a fine of up to \$5,000.00. Measuring 6,000 crab, per 18-hour day, is still over 5 crab per minute.

Our members have been examining where the additional 7% to 8% of gross revenue is to be extracted in order to pay for the extra man now clearly needed. Formerly, the crab size could be 'eyeballed' for the high average catch size required by the processor who also accepted a few random undersized crab w/o a penalty.

Item 5) The additional 7% to 8 % tax on gross stock will not stop the potential for an increased volume, but it does have a braking effect. The present size limit of 5.5" was untimely in this respect, particularly when every possible economic incentive is needed now for that increased productivity needed to make our case in the Bering Sea.

Objectively and in all fairness, the present size limit is not yet the prerogative of the Council to alter. This year is a critical development year for the Pacific and any immediate alleviation of this stress is in the hands of the Alaska Board of Fisheries.

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