

**C4 Initial Review:
Partial offloads in the BSAI Crab
Rationalization Program**

June 2019

Presentation to the Council

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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 or “split” deliveries to multiple processors, BUT
- Cannot fish or haul gear in between



Offloading crab, NPFMC

HISTORY OF ACTION

Proposal from
PNCIAC
APRIL 2018

Discussion paper
FEBURARY 2019

Initial Review Draft
JUNE 2019

CONTEXT

- Regulations included during the development of BSAI crab rationalization
- The concern was that partially offloading crab during a trip would exacerbate the opportunity to discard crab illegally
- Unlikely to be the case, BUT
- Greatly simplifies accounting process
- Created an exception for the Western Aleutian Islands golden king crab fishery in 2016 (Council action in 2015) to help promote live market opportunities in Adak
- Harvesters have financial incentives to offload as efficiently as possible 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 the safety or economics of the operations

For full purpose and need see Section 2.2, Page 12 in document

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 in document

SUMMARY OF EXISTING CONDITIONS

Section 2.6, page 13- 37
in document



Setting pots, NPFMC

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

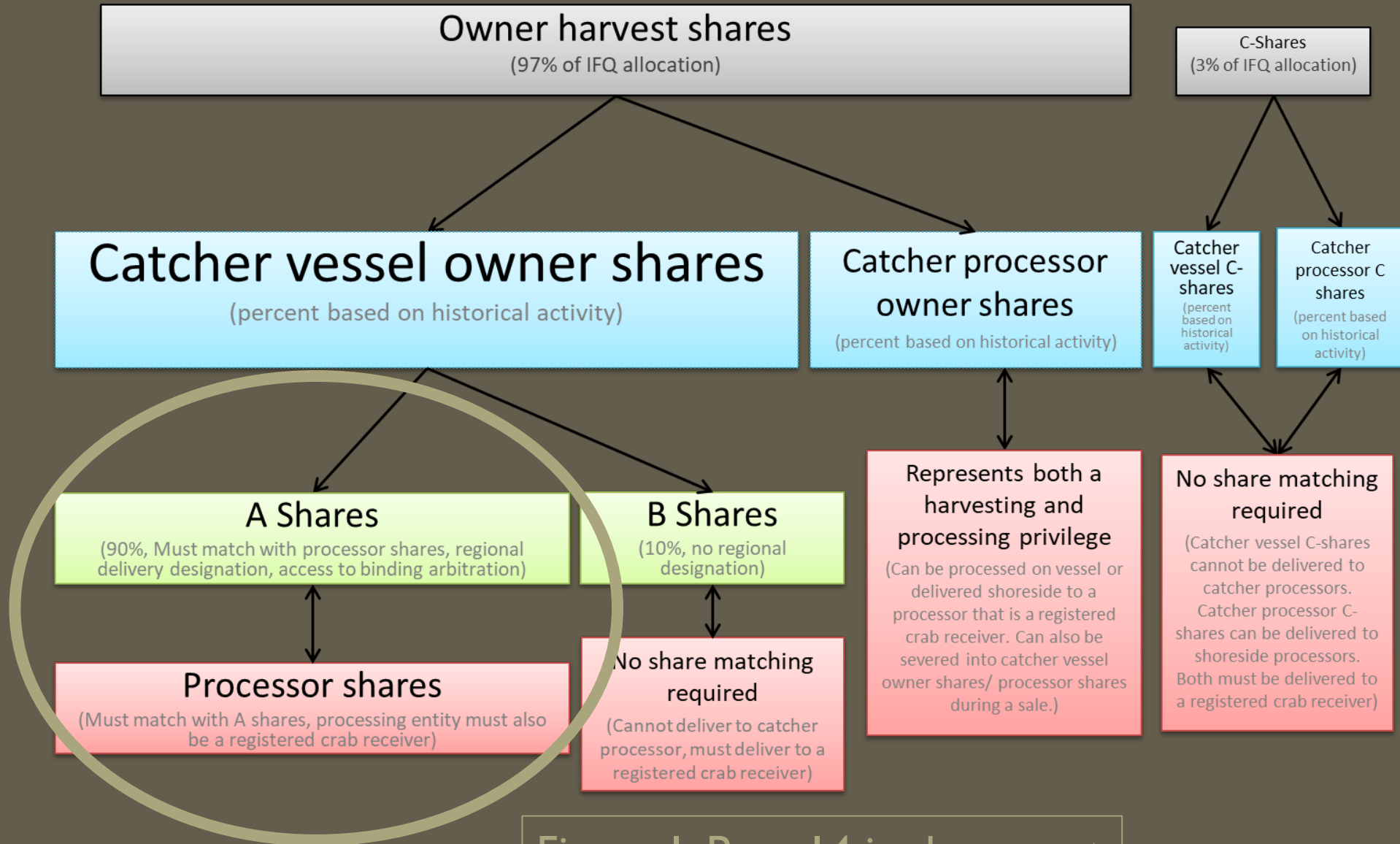


Figure 1, Page 14 in document

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		

Table 1, Page 15 in document

HARVESTING SECTOR BACKGROUND

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

Section 2.6.2, Page 17- 26 in document

PROCESSOR AND COMMUNITY BACKGROUND

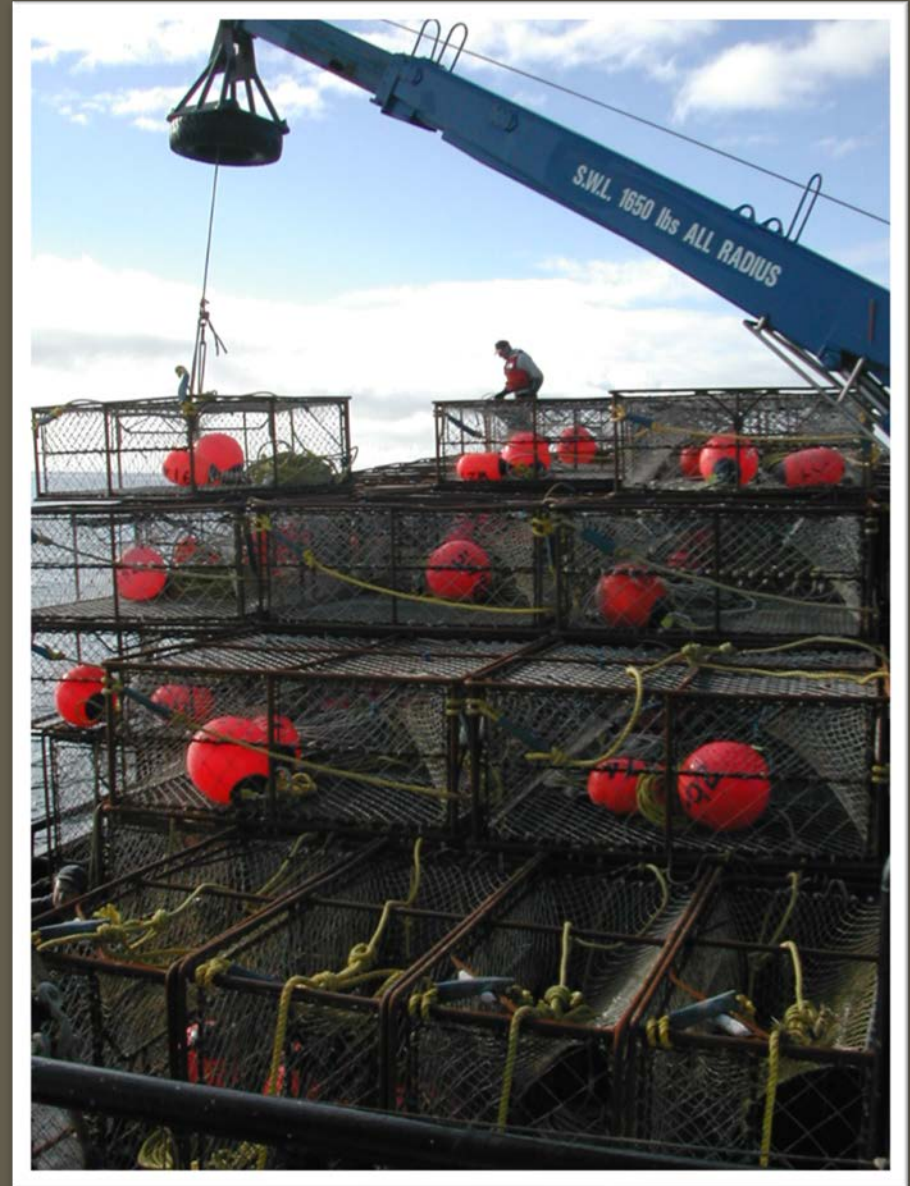
- Focus on processors and communities associated with BSAI crab landings (where B and C shares are being landed)
- Akutan, Dutch Harbor/ Unalaska, King Cove, Kodiak, St Paul, Adak, Naknek
- Context on vessel capacity and the delivery process

Section 2.6.3, page 27- 36 in document

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, page 36-37 in document



Stacking pots, NPFMC

ANALYSIS OF IMPACTS

Section 2.7, page 38-50



Offloading crab, NPFMC

SCOPE OF CHANGE



Offloading crab, NPFMC

- Expected to be a limited scope of impacts from this action
- Only expected to be used in special circumstances related to the safety or economics of the operations
- Primary motivation for *not* using this option:
 - 1) Risk of deadloss – both tanking up/ down to offload a partial tanks and due to increase time before offload
 - 2) Efficiency of full offload
- Limited use of this flexibly in the WAG fishery
- Primarily be used due to issues related to split north/ south deliveries
- Would not be regulatory constraints to *ensure* scope remains limited

Section 2.7, page 38-39 in document

POTENTIAL IMPACTS ON HARVESTERS

- Overall positive, increased flexibility, not required to change their behavior
- Give harvesters a flexible option to use when it benefits their operations (e.g. ice, weather, opportunistic deliveries, etc)
- Reasons for proposal cited by NOAA OLE:
 - Several anecdotes where this regulation has become problematic for harvesters
 - OLE must continue to enforce the prohibition even if the crab is accounted for through their IFQ



Vessels delivering to St. Paul, NPFMC

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.

CATCH BY STATISTICAL AREA

- Primary accounting concern has to do with 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 also* still know the proportion of catch and effort by statistical area for both partial trips together
- Difficultly is in splitting out the proportion of catch and effort by stat area for each landing (don't know how much crab is left onboard)

- ADF&G could add a reporting requirement on Fish Ticket
- Occurrence of these trips will dictate the level of impact

Section 2.7.3.2 page 45-46 in document

OPTION TO ALTERNATIVE 2

- May be general practice in order to increase efficiency and minimize deadloss
- BUT some situations this extra requirement would prevent a vessel from doing a partial offload
- Might not be able to offload everything if it has regional designation
- ALSO difficult to enforce
- May be a “best practice” to provide a potential to edit fish ticket

Section 2.7.1, page 40-41 in document

POTENTIAL IMPACTS ON PROCESSORS AND COMMUNITIES

- Given the expectation of magnitude of change and the structure of the CR Program, scope of impacts to processors and communities expected to be limited



Dutch Harbor/ Unalaska, NPFMC

Section 2.7.2, page 41 in document

POTENTIAL CHANGES THAT COULD IMPACT PROCESSORS AND COMMUNITIES



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

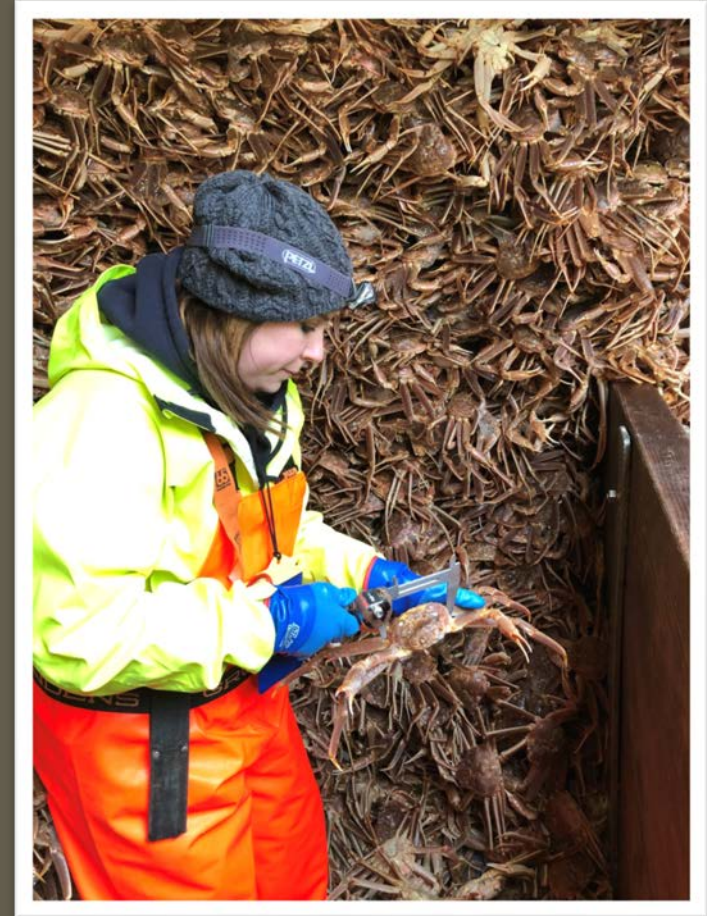
Section 2.7.2, page 41-43 in document

- Change in processing distribution of B/C and CPO shares
- Potential increase of crab deadloss
 - Not a conservation concern because it is accounted for in their IFQ/ IPQ
 - Economic concern for harvesters and processor
 - There may be circumstances where it is worth the risk for the harvester, due to the a decrease in costs, but that cost-saving is not passed on to the processor
- Could support live markets for crab if they develop AND there is no additional frozen storage

SUMMARY OF POTENTIAL IMPACTS TO MONITORING, ENFORCEMENT, COST RECOVERY

- Changes to ADF&G dockside sampling and Observer Program protocol to deal with the complexity of a partial offload in the middle of a trip
- Changes in enforcement protocol for dealing with harvest of illegal crab (legal tally)
- Increased communication between harvesters using this flexibility and ADF&G
- Any implementation costs would be recovered through the CR Program Cost Recovery

Section 2.7.3, page 43-49 in document



Size frequency sampling, NPFMC

POTENTIAL IMPACTS ON SAFETY AT SEA

- Testimony on the benefits of the proposed action's benefits on safety at sea
- The proposed action increases *fishing flexibility*; allows more opportunity to *fish*
- Although issues could be related to dangerous ocean and weather conditions, unlikely to address *purely safety concerns*
- Likely to include at least some part personal economic motivation (lost pots/ loss of time)
- Difficult to tease apart these incentives
- Even with this additional flexibility, as always, captains should use their rational judgment about risk

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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 a EFP to work out practical aspects of the rule change.