DRAFT REPORT

Industry Perceptions of Measures to Affect Access to Quota Shares, Active Participation, and Lease Rates in the Bering Sea and Aleutian Islands Crab Fisheries



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March 2015

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ABSTRACT

In 2010 the North Pacific Fishery Management Council (NPFMC) completed a 5-year review of the Bering Sea and Aleutian Islands (BSAI) Crab Rationalization Program. The review highlighted a suite of social concerns that have emerged in the fishery since the management change. The central issues perceived by the NPFMC were the impact of high quota share lease rates on crew pay, difficulty for skippers and crew to purchase quota shares, and concerns about quota ownership by people or entities that do not have a financial stake in a vessel. The NPFMC initiated discussion and analyses on these issues and ultimately decided to encourage the crab fleet to address the issues through voluntary measures. The crab cooperatives developed measures to address the NPFMC's concerns, which were implemented in 2013. The measures include the Right of First Offer program that gives skippers and crew an initial opportunity to purchase quota shares, and a voluntary lease rate cap for two of the eight crab fisheries. The National Marine Fisheries Service's Alaska Fisheries Science Center developed a study in 2014 to gather perspectives on the cooperative measures from fishery participants. A diverse group of participants in the BSAI crab fisheries were interviewed and asked about their perceptions on measures to affect access to quota shares, active participation, and lease rates. A total of 220 individuals across 6 participant categories shared their perspectives. Although industry efforts to internally address these issues are still relatively new, the aggregated perspectives presented here are intended to broaden the feedback available to the cooperatives and the NPFMC as the measures are refined over the coming years. The results of this report are based on a preliminary analysis of the data and represent a summary of the perspectives of interviewees. Further interpretive insight will be yielded by applying a more formal model-based analysis of the data that will support statistical testing of analytical results.

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INTRODUCTION

The Bering Sea and Aleutian Islands (BSAI) commercial crab fisheries are some of the most lucrative fisheries in the North Pacific. Fishermen target eight distinct stocks, including (1) Bristol Bay red king crab, (2) Bering Sea snow crab (also referred to as opilio), (3) Bering Sea Tanner crab, (4) Aleutian Islands golden king crab, (5) Pribilof Islands red king crab, (6) Pribilof Islands blue king crab, (7) St. Matthew Island blue king crab, and (8) Western Aleutian Islands red king crab (NPFMC 2011). Management of the crab fisheries is done by the State of Alaska, with oversight by the North Pacific Fishery Management Council (NPFMC) and National Marine Fisheries Service (NMFS). Many of the crab fisheries are open in the winter and spring and are prosecuted by large industrial vessels due to the timing and location (Fina 2011). The fisheries for Pribilof Islands red and blue king crab and for Western Aleutian Islands red king crab have been closed since before 2005. In addition, the Bering Sea Tanner crab and St. Matthew Island blue king crab fisheries have been subject to short-term closures.

Japanese and Soviet fleets initiated commercial fishing for king and Tanner crab species in the eastern Bering Sea (NPFMC 2011, Package-Ward and Himes-Cornell 2014). The crab fisheries began to shift to domestic harvest beginning in the 1960s. With adoption of the Magnuson Fishery Conservation and Management Act of 1976, the U.S. established fishery management jurisdiction out to 200 nautical miles. Soon thereafter, domestic harvests fully displaced foreign fleet harvests. Increasing capitalization of the crab fleet led the NPFMC to adopt management strategies to limit effort in 1996. These strategies included a moratorium on vessel entry and a cap on length increases for participating vessels (NPFMC 2011). In 2000, to more permanently address the overcapitalization of the fleet, the NPFMC implemented a vessel license limitation system that replaced the moratorium. The vessel license limitation system effectively capped new vessel entry into the fishery, but did not address the existing excess capacity in the fleet (Fina 2011).

Boats raced to catch as much crab as possible before the fleet-wide harvest limit was reached, which led to a continued shortening of the season to just a few days for some stocks (Fina 2011). Safety concerns also became a significant issue as a result of the race to fish. The severe overcapitalization led the NPFMC to pursue management changes for the fishery (NMFS 2004). The NPFMC worked to address the economic inefficiencies of the fishery; issues with product value due to deadloss²; and high economic volatility for harvesters, processors, and fishery-reliant communities (NMFS 2004). The NPFMC's preferred alternative was a three-pie voluntary cooperative program,³ which the U.S. Secretary of Commerce approved through the Consolidation Appropriations Act of 2004 (NPFMC 2011). The BSAI Crab Rationalization Program (hereafter referred to as the Rationalization Program) was implemented in 2005. The program created four distinct classes of harvester shares: catcher vessel owner (CVO), catcher processor owner (CPO), catcher vessel crew (CVC), and catcher processor crew (CPC); as well as processor quota shares (PQS). Shares were further designated with regional landing

² Deadloss is crab that is landed dead at the dock (NPFMC 2010).

³ The "three-pies" refer to the basic structure of the program with harvester quota shares, processor quota shares, and community protection measures. The program is also designed to allow harvesters to voluntarily join cooperatives (NMFS 2004).

restrictions and, in the case of CV shares, harvester to processor matching requirements (NMFS 2004).

The crab fleet changed drastically upon the implementation of the Rationalization Program, contracting to approximately one-third of its pre-rationalization size as quota owners tied up their boats and began leasing their quota shares to other active vessel operations (NPFMC 2008). The fishery regulations included eligibility conditions and caps on CV quota ownership holdings, but vessel use cap provisions applied only to vessels choosing to fish outside of a cooperative. This helped induce cooperative membership which facilitated quota stacking among cooperative members; and by 2009, close to 100% of all landings occurred within cooperatives (NPFMC 2012). In addition, quota leasing was incentivized due to favorable lease rates and high operating costs for vessels in the fishery (NPFMC 2008).⁴ The effects of the resulting high volume of leasing activity and distribution of benefits between vessel owners, crewmembers, and quota shareholders were highlighted in the NPFMC's 5-year review of the program (NPFMC 2010). The NPFMC was particularly concerned with lease rates, the proportion of net revenues accruing to non-vessel owning quota shareholders (hereafter referred to as passive quota shareholders), and difficulties for active participants (e.g., skippers and crewmembers) to buy into the fisheries through the purchase of quota shares (NPFMC 2012). Following the 5-year review, the NPFMC requested analysis of these and other issues that were perceived to be negatively impacting crew shares in the fishery (NPFMC 2012).

In early 2013, following a series of discussion papers, the NPFMC ultimately decided that it preferred that passive quota ownership, access to quota shares for active participants, and the impacts of lease rates on crew compensation be addressed by voluntary measures implemented by the fisheries' cooperatives. This option was selected due to the perceived costs and burden to the government to develop and implement regulations on these issues, as well as the determination that the root of these issues lay in the cooperative structure and the flexibility that membership conferred to participants (NPFMC 2012). Additionally, cooperative representatives expressed to the NPFMC that they were internally developing measures to address the NPFMC's concerns (NPFMC 2013). The NPFMC made the decision to allow cooperatives to continue to work to address these concerns, and requiring a yearly report on as to their progress and effectiveness of the efforts.

The crab cooperatives spent considerable time developing strategies to address the NPFMC's concerns and ultimately adopted two principal measures. First, after holding scoping meetings with fishery participants, several of the cooperatives collaborated to develop a program to address access to quota shares for active participants. The 'right of first offer' program

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⁴ Cooperative membership was incentivized for individuals holding CVC in particular because membership conferred exemption from active participation requirements and leasing restrictions built into the CVC ownership requirements. However, because this was not the NPFMC's original intention in the creation of CVC shares; in 2008, the NPFMC took final action on a regulatory amendment to modify the active participation requirements and eligibility for CVC shares. NMFS issued a proposed rule in 2014. The proposed active participation requirements "[...] would require a C shareholder to demonstrate that he or she had either (1) participated as crew in at least one delivery of crab in one of the CR Program fisheries in the three crab fishing years preceding the year for which the individual is applying for C share IFQ or, (2) if the individual C share QS holder received an initial allocation of C share QS, participated as crew in at least 30 days of fishing in State of Alaska or Federal Alaska commercial fisheries in the three crab fishing years preceding the year for which the individual is applying for C share IFQ (50 CFR Part 680).

(ROFO) was created and incorporated into the largest cooperative's (ICE) binding membership agreement, which took effect in May 2013 (Letter to the NPFMC, Crab Cooperatives 2013). The program was set up to allow eligible individuals or entities to sign up through a website to receive email notifications when quota shares become available (Crab Cooperatives 2013). This eligibility requirement was designed to be the same as that used for initial eligibility for receipt of CVC (50 CFR 680.40)⁵. Individuals or entities that were initially issued CVO shares are not eligible to buy quota shares using the ROFO program.

Under the ROFO program, when quota goes up for sale (CVO or CPO), there is a 15 day period in which eligible skippers and crew may agree to purchase up to 10% of the quota under the associated sale terms (Crab Cooperatives 2013). Upon expiration of the 15 day period, a 5 day period begins in which the quota is available for any 'active fisherman' to purchase for the associated sale terms. The ROFO program defines 'active fisherman' as a person who holds a direct or indirect ownership in a commercial fishing vessel or an individual who is a registered skipper or licensed crewmember (Crab Cooperatives 2013). After the expiration of the 5-day period, the remaining quota is available for sale to any other person or entity that meets the Rationalization Program's eligibility to receive transfer of CVO quota shares criteria. Of the 10 existing cooperatives in 2013, 2 incorporated ROFO as binding requirements of membership, 4 relied on voluntary adherence by their members, and the other 4 did not explicitly adopt the provisions of ROFO. Table 1 summarizes the participation of each cooperative.

Table 1. -- Summary of cooperative participation in measures to address access to quota shares, active participation, and lease rates.

Cooperative name	ROFO participation	Voluntary lease rate cap participation
Alaska King Crab Harvesters Cooperative	Voluntary	Voluntary
Aleutian Island Cooperative	Voluntary	Voluntary
Alternative Crab Exchange (ACE)	Binding	No explicit adoption
Coastal Villages Crab Cooperative	Voluntary	No explicit adoption
Crab Producers And Harvesters LLC	No explicit adoption	No explicit adoption
Dog Boat Cooperative	Voluntary	Voluntary
Independent Crabber's Cooperative	No explicit adoption	No explicit adoption
Inter-Cooperative Exchange (ICE)	Binding	Voluntary; with mandatory reporting to third party
R & B Cooperative	No explicit adoption	Internal lease rate reductions
Trident Affiliated Crab Harvesting Cooperative	No explicit adoption	No explicit adoption

⁵ Initial C share eligibility include participation in one landing during three of the qualifying years and one landing in two of the three most recent seasons prior to 2002 (NMFS 2004).

In response to Council concerns regarding the potential effect of high lease rates on crew compensation and vessel operations, the largest cooperative, ICE, specifically asked its members (both vessel owners and quota shareholders) to voluntarily cap their lease rate asks and offers to 65% and 50% of adjusted gross revenues for Bristol Bay red king crab and Bering Sea opilio crab, respectively. Three other cooperatives have followed suit. According to representatives of ICE, the lease rate cap was designed to guide lease rate negotiations among members, but because the caps are voluntary, ICE anticipates some variation around those rates.

The voluntary cooperative reporting on these measures consists of a letter submitted to the NPFMC by each cooperative representative⁶, submitted to the record for the April meeting of the NPFMC's annual cycle. In general, the cooperative reports reflect the views of cooperative representatives and their members. Quota shareholders are cooperative members, and while nonquota share holding skippers or crew may interact with the cooperative of which the vessel they fish aboard is a member, they are not necessarily represented by the cooperative representative. Discussions at the NPFMC about the initial rounds of reporting included a preference stated by some NPFMC members for more information about the effectiveness of the cooperatives' measures (NPFMC 2014). In response to this, social scientists with the Alaska Fisheries Science Center's (AFSC) Economic and Social Sciences Research Program (ESSRP) initiated a study to capture broader perspectives on the voluntary measures, as well as more generally on the issues identified by the NPFMC. To inform a broader understanding of industry participants' views on the current efforts to address the NPFMC's concerns, AFSC and Pacific States Marine Fisheries Commission social scientists conducted interviews with fisheries participants regarding many of the NPFMC's stated concerns. In this report, we summarize a selection of the most salient issues explored in those interviews. We discuss the methods used, the topics covered, and review the results of the interviews, by major theme. We conclude the report with a discussion of how the results can be used to inform the NPFMC and cooperatives' efforts to refine the voluntary measures.

As discussed below, significant effort was made to avoid any source of systematic bias and ensure the findings of the study are illustrative of perceptions among the respective participant groups. We offer measures of the representativeness of the individuals interviewed in relation to the larger populations through non-response bias analyses. However, the results of the study represent a summary of perceptions among the distinct populations regarding various features of the Rationalization Program, and voluntary measures put in place by the cooperatives. The study does not attempt to assess the validity or accuracy of survey respondents' subjective views, and findings are limited to identifying the relative frequency with which common perceptions (or possibly misperceptions) occur. The reader is cautioned to observe this caveat in interpreting the findings of the study.

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⁶ At the time of publication, 9 of the 10 cooperatives had been active in the discussions and reporting to the NPFMC.

METHODS

Research design

The methodological strategy of this study focuses on the collection of qualitative data through semi-structured interviewing. The qualitative nature of the data collection centers on mapping individual's attitudes and opinions about the topic areas and exploring the meanings that they place on processes and events they have experienced (Bernard 2006, Miles and Huberman 1994). Qualitative data collection methods, such as were used here, are best applied to research focused on building a detailed understanding of individual experiences when the boundaries of the issue are poorly understood and the context is vital to the overall understanding of the issues (Bazeley and Jackson 2007, Miles and Huberman 1994). Semi-structured interviewing balances the desire for replication between interviews, with allowing the interviewer to follow leads with topics that emerge within the context of the interview (Bernard 2006). The analysis of the data presents quantitative results in the form of frequency counts for themes and sub-themes. More specifically, the process of coding transforms free-flowing text into nominal variables that can then be analyzed quantitatively (Bernard 2006). The contribution that this type of data can make is to provide context on the opinions and behaviors that ultimately drive the patterns observed in the existing quantitative data on these topics (Johns 2001, Miles and Huberman 1994).

Participant population

We defined the population of interest as harvest quota shareholders (all individuals and entities holding CVO, CPO, CVC, or CPC quota shares), crewmembers, hired skippers (hereafter simply referred to as skippers), vessel owners, and cooperative representatives involved in the BSAI crab fisheries in the 2012-2013 fishing year (the most recent year of information available at the time of study development). We also sought input from representatives from each of the Community Development Quota (CDQ) groups and crab fishery experts. Expert respondents included individuals involved with lending, advocacy, and related activities specific to the BSAI crab fishery. Participants across all eight fisheries included under the NPFMC's King and Tanner Crab Fishery Management Plan were included. These categories of participants are overlapping (i.e., some entities are both quota shareholders and vessel owners and some vessel owners are skippers, etc.). Therefore, there is redundancy between these categories (i.e., specific entities or individuals may be in more than one category.

To determine the overall population, we obtained ownership records and contact information for participants from the 2012-2013 fishing season. Contact information for the populations of hired skippers was gathered by matching Commercial Fishery Entry Commission (CFEC) gear operator permit numbers, reported on Alaska Department of Fish and Game (ADF&G) landings reports, with the CFEC permit registry. Contact information for crewmembers other than captains (including deck crew, engineers, cooks, and other non-

⁷ Quota shareholders in the Pribilof Islands red and blue king crab and Western Aleutian Islands red king crab fisheries were included as "participants" for the purposes of this study, even though those two fisheries have been closed for the entire duration of the crab rationalization program to date.

processing crew) was gathered by matching CFEC gear operator permit and ADF&G commercial crew license numbers, reported in the 2012 and 2013 annual BSAI Crab Economic Data Reports (EDR), with the respective registries provided by CFEC and ADF&G.⁸

Finally, we obtained contact information for vessel owners and quota shareholders from the NMFS, Alaska Regional Office (AKRO), Restricted Access Management Division. Vessel ownership and quota share ownership in the BSAI crab fisheries is complex with much of the ownership held in LLCs or other types of partnerships with multiple owning entities. Quota share owning entities are required to report their ownership structure to the AKRO on the annual Individual Fishing Quota application, including both the tiered owning entities and the percentage they hold of the larger entity. Vessel ownership structure is also reported to the individual level by percentage, as a requirement of using a hired skipper in the fisheries. Therefore, quota ownership and vessel ownership are collected down to the individual level. However, for the purposes of this study, we used the publicly available ownership information for both vessel ownership and quota share ownership to identify and target entities in both categories. We used this strategy primarily because contact information is only available for the entity or individual that is directly issued the quota. Additionally, the individual ownership data we were able to access represented the most recent ownership structure (as of early 2014), rather than the ownership data from 2012, which was the target year for the rest of the participant population. This is due to the fact that the AKRO continuously updates its ownership information, rather than maintaining 'snapshots' of ownership data for a particular year. Therefore, we are unable to obtain ownership information for 2012 to match the other respondent categories. While targeting the primary ownership level may not represent the viewpoints of all owning entities, we felt that targeting one representative from each of the primary ownership entity would provide a comprehensive viewpoint of vessel activity and/or quota share leasing decisions.

For the purposes of analysis, participants were post-stratified following data collection into one of nine mutually exclusive participation categories (see Table 2 for a list of the categories). Classifying respondents into these mutually exclusive categories was facilitated by information obtained during interviews. Entities solely owning processor quota shares were excluded from the participant population, given that the interview topics were not directly relevant to their participation in the fisheries. These mutually exclusive categories may provide more specificity to the results, due the range of participants that the general categories of quota shareholder, vessel owner, skipper, and crewmember include. Therefore, the results are structured to first explain the results for the larger, overlapping categories of participants and then drill down into the mutually exclusive sub-categories that may provide more detail about the data.

Table 2 provides our best estimate counts of fisheries participants in each of the nine participation categories. We refined the total number of unique participants in each category during the course of the project as participants revealed their participation and ownership affiliations. We determined that there were duplicate contacts, both within and between

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⁸ Crab vessel fishing crewmembers are legally required to hold either an ADF&G commercial crew license through ADF&G or a CFEC gear operator permit; in the annual crab EDR, vessel owners are required to identify all crab fishing crewmembers that worked on the vessel during the year by either CFEC gear permit or ADF&G crew license number.

participant categories, and an overlap in ownership of many entities (e.g., a vessel owner held the vessel under one LLC and held quota shares under a different LLC). We narrowed down the total unique number of respondents through information obtained in interviews, such as skippers that had retired or crewmembers that had duplicate records. Additionally, this included reducing duplication from partnerships where each participating entity or individual was already represented in the population. We attempted to conduct a census of all entities under each category given that statistical sampling requirements would have necessitated close to a complete census in order to ultimately be able to make generalizations about the populations as a whole (Rea and Parker 2005).

The type of contact information available for different types of participants varied; generally, email address, mailing address, and phone number were available for quota shareholders, vessel owners, and skippers. Some contact information listed for vessel owners was for an accountant or another person that had a role in handling the preparation of the EDR for that vessel. In that situation, we made contact with the person listed and requested that they forward on our request for their client's participation. Contact information available for crewmembers through the ADF&G crew license registry generally only included a mailing address. An attempt was made to contact all crewmembers by mail, using the address information provided in the ADF&G crew license registry, which was only partially successful. Supplemental contact information (e.g., phone numbers, email addresses, or updated mailing addresses) for all identified crewmembers was sought from vessel owners and skippers. Information about the research study and requests for participation were also publicized in industry news outlets (i.e., Seafoodnews.com and *Pacific Fishing* magazine) and distributed at the February 2014 NPFMC meeting.

Interview implementation

We used the Dillman Tailored Method as a guide for structuring participant contact and interviewing methodology (Dillman et al. 2009). This included using multiple modes of contact when possible to increase the probability of reaching diverse types of participants and to encourage as many people as possible to participate. Timing of contact for different participant types was structured around fishing seasons as much as possible given that many crab fishermen also participate in other fisheries, which elongated the time period of data collection. The opilio and salmon seasons were the fisheries that overlapped the most with this data collection.

⁹ It is likely that duplication of the total number of participants in each category still exceeds what is reported in Table 1 given that every participant was not reached during the course of this study. With further information about the participation of those that we were unable to contact, we could likely further refine the total number of participants in each category.

Table 2. -- Participant Population in the Bering Sea and Aleutian Islands Crab Fishery (2012-2013)

	Total					Total unique
	number of	Number of	Incorrect	Incorrect	Incorrect	entities with
	records in	unique	mailing	phone	email	correct contact
	original data	entities	address	number	addresses	info
Quota share holders	528	343	4	26	-	340
Vessel owners	77	75	1	1	0	75
Skippers	116	114	9	9	6	112
Crew	581	581	106	11	4	475
Community Development Quota	6	6	0	0	0	6
group representatives						
Expert respondents	-	13	-	-	-	13
Total*	1121	892	118	40	10	787

^{*} The totals represent the unique population in the crab fisheries. Due to overlap between the participant categories, the total population size is smaller than the sum of each category's population.

The project began by contacting all crab cooperative representatives to explain the study and ask for their participation. We then sent initial contact emails to registered vessel owners, registered hired skippers, and crewmembers with known email addresses. We also sent letters to all registered crewmembers, quota shareholders, hired skippers and vessels owners that had not already been interviewed. Finally, a follow-up telephone call was made to all quota shareholders, skippers vessel owners, and crewmembers that had not been interviewed and for whom we had obtained phone numbers. A maximum of six phone calls were made to each entity. Any participant who explicitly refused to participate was removed from the call list. If no one picked up the phone on the first attempt, a voicemail was left for the participant describing the project. A voicemail message was not left for the subsequent phone calls. Phone calls to individual entities were varied by day of the week and time of the day to increase the probability of response. Table 3 summarizes the timing and method of each type of contact.

Table 3. -- Summary of the timing and method of each type of contact made with fisheries participants.

Participant type	Date	Method
Crab cooperative representatives	January 28, 2014	Email
Registered vessel owners	March 17 to March 19, 2014	Email
Registered hired skippers and crewmembers	March 20 to March 24, 2014	Email
(with email addresses)		
Registered vessel owners, hired skippers,	April 16, 2014	Letter
crewmembers, and quota shareholders		
Registered vessel owners, hired skippers,	May 29 to July 7, 2014	Follow-up
crewmembers, and quota shareholders		telephone call

Interviews were conducted with participants either over the phone or in-person. We conducted in-person interviews in the Seattle area, the Juneau area, and Kodiak. Interview lengths ranged from 15 minutes to 2.5 hours. Interviews were semi-structured with a predetermined topic list as a starting point. The general topic list is included in Table 4. The interview topic list was initially developed based on NPFMC discussion documents that were written in response to the 5-Year Review of the Crab Rationalization Program and subsequent NPFMC discussion papers on the topic areas of active participation, lease rates, and access to quota shares. We refined the interview topic list through consultation with NPFMC staff, NPFMC members, industry representatives, and cooperative representatives. The content of each interview differed based on the participant's background, role in the fishery, level of knowledge about the topics, and desire to discuss specific topic areas. Interviews were audio recorded with participant consent. If participants preferred not to be recorded, the interviewer took written notes. Audio files were transcribed and subsequently destroyed if participants asked that we do so.

Table 4. -- Interview topic list

Main topic	Sub-topics
Participant's background	 Length of time in fishery Vessel affiliation Participation in other fisheries Initial issuance of quota Purchase of quota since program inception Cooperative membership Knowledge of voluntary measures to address active participation, lease rates, and crew compensation
Current measures by the cooperatives to address issues with active participation, crew compensation, and lease rates	 Possible metrics for evaluating efficacy, thresholds for achieving success Timeframe for evaluating efficacy Long-term maintenance and operation of these measures Development process of implemented measures
Incentives of and challenges to addressing the Council's concerns about crew compensation, lease rates, and active participation	 Effects of the cooperatives' measures on these incentives and challenges Definition of active participation in the BSAI crab fisheries Perception of current level of active participation in fishery
Access to owner quota shares and the functioning of this market	 Interest in purchasing quota shares Accessibility to owner quota shares for skippers and crewmembers Factors affecting quota share buying and selling decisions The impacts of the voluntary measures on these factors and decisions Availability of financing for quota share purchases The notification process for owner quota share sales
Future of the fishery as a reflection of the above three discussion topics	 Interest amongst potential new entrants into the fishery Incentives and barriers for new entrants Impacts of the issues with active participation, lease rates, and crew compensation on potential for new entry Impacts of the voluntary measures on this potential Other mechanisms for facilitating entry

Response rates

A total of 207 interviews were conducted with a total of 220 individuals across the 6 participant categories (vessel owners, quota shareholders, skippers, crew, CDQ representatives, and expert respondents); the discrepancy in numbers is due to 6 group interviews that are each treated as one interview. Of the 207 interviews, 17.8% (n=37) were conducted in person, 81.7% were conducted over the phone (n=170), and 0.5% were conducted over email (n=1). Response rates were calculated using the pool of participants with accurate contact information (Table 5). For example, 107 mail addresses for crewmembers were incorrect; therefore, the response rate for that category of participant is based on the subset of people for which at least one mode of valid contact information existed. Ultimately, of the interviewed crewmembers, 11 responded to the letter request for participation (22.4%), while 31 of the crewmember interviewees (63.3%) were successfully contacted through supplemental information provided to us by other study participants. Crewmember interviewees that were contacted using information provided by the vessel owner accounted for 10.2% of interviewees, while skippers and other crewmembers both contributed to 26.5% of the crewmember interviewees contacted using supplemental contact information. Overall, reviewing the vessels on which the crewmembers who were interviewed most recently worked, there were crewmembers from 27 different boats that made landings in the 2012-2013 fishing season. This represents at least one crewmember from 31.4% of the vessels that were active that season who were interviewed for this study. For the remaining interviewees, we either had other contact information (e.g., through the quota shareholder registry), or they contacted us after having heard about the study through our outreach efforts. Due to the low response rate, the data presented here cannot be used as a representative view from crewmembers on these issues. We include the crewmember data separately as a means to suggest areas for further research. This information should not be used to provide crewmember perspectives on the voluntary measures; we cannot draw conclusions about general crewmember perspectives on the voluntary measures to address access to quota shares, lease rates, and active participation from these interviews.

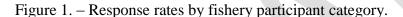
Through participant contact, we determined that the initial participant pool for quota shareholders included individuals or entities that held processor quota shares, but not harvester quota shares. These entities were considered to be outside the scope of the research due to the different dynamics that exist in the fishery in the processing and harvesting sectors, and were removed from the applicable participant pool for the determination of response rates. The non-response category includes people or entities that were contacted but were ultimately unavailable during the data collection period, often due to being out fishing, and those that were scheduled for interviews but were unavailable at the designated time. The refusal category includes participants who specifically told the researcher that they were unable or unwilling to participate.

The overall response rate across all categories of fishery participants was 25.9%; however, this is heavily weighted by the number of crew non-respondents. If crewmembers are excluded, the overall combined response rate across all other categories is 45.5%. Figure 1 and Table 5 outline the response rates by category of respondent. Responses from cooperative representatives are not presented as a separate group as nearly all representatives had other roles in the fishery, such as vessel owner or quota shareholder. Any cooperative representatives that did not fit in the other categories were aggregated into the expert respondent category. When compared against the active vessel list for 2012, at least one individual was interviewed on 87.2% of the vessels (n = 75). Refusals were highest among quota shareholders (8.2%) and

vessel owners (6.7%). Response rates were considerably higher for vessel owners (70.7%) and CDQ representatives (83.3%) as compared to crewmembers (10.3%). These differences reflect the lack of contact information available due to the general transient nature of many crewmembers, as well as their unavailability while at sea.

As noted in Lew et al. (2015), there is not a standard response rate that is assumed to be a threshold for representativeness of the population interviewed in relation to the greater population. Some past studies have used response rates greater than 65% as a threshold for representativeness, and therefore foregoing an analysis of potential sources of non-response bias. However, Groves (2006) presents a meta-analysis of the assumption that there is a threshold response rate above which, the sub-population is assumed to be free of major non-response biases. The meta-analysis demonstrated that there is not a pattern across studies of the relationship between response rate and non-response biases. Therefore, in order to provide a more robust understanding of the representativeness of our interview results, in the next section, we present a suite of non-response bias analyses for each sub-population using external data. These analyses help frame the evaluation of the response rates for the individual sub-populations.

As discussed in the *Participant Population* section above, participants were post-stratified into mutually exclusive categories based on information obtained during the interviews. Table 6 breaks down the number of responses from the four higher level categories into these mutually exclusive categories in order to provide more context about those individuals that ultimately participated in this study.



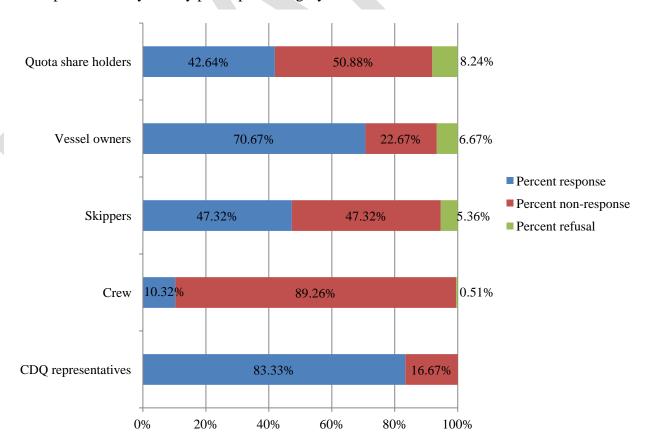


Table 5. -- Participant response rates by non-exclusive category.

		Number of unique							
	Number of unique participants	participants successfully contacted	Participants removed from pool*	Number of responses	Percent response **	Number of non- responses	Percent non- response	Number of refusals	Percent refusal
Quota share holders	343	340	14	139	42.64%	173	50.88%	28	8.24%
Vessel owners	75	75	-	53	70.67%	17	22.67%	5	6.67%
Skippers	115	112	-	53	47.32%	53	47.32%	6	5.36%
Crew	581	475	-	49	10.32%	424	89.26%	2	0.51%
Community Development Quota group representatives	6	6	-	5	83.33%	1	16.67%	0	0.00%
Expert respondents	-	-	-	13	-	-	-	-	-
Total***	963	851	14	220	25.85%	581	68.27%	32	4.20%

^{*} This category includes participants that were initially contacted but were later determined to be outside the scope of the participant pool for the project (e.g. Processor quota share owners).

^{**} Response rates were calculated using the number of unique participants successfully contacted in each category.

^{***}The totals represent the unique population in the crab fisheries. Due to overlap between the fishery participant categories, the total population size is smaller than the sum of each category's population.

Table 6. -- Break-down of interviewees into mutually-exclusive fishery participant categories.

High-level participant groupings	Total Number of Responses	Low-level participant groupings	Number of Responses	% of total responses in high level grouping
Quota shareholder	139	Passive quota shareholder	67	48.20%
		Quota shareholder and vessel owner	29	20.86%
		Quota shareholder and owner/operator	20	14.39%
		Quota shareholder and skipper	20	14.39%
		Other ¹	3	2.16%
Vessel owner	53	Quota shareholder and vessel owner	29	54.72%
		Quota shareholder and owner/operator	20	37.74%
		Other ¹	4	7.55%
Skipper	53	Non-quota shareholding skipper	13	24.53%
		Quota shareholder and skipper	20	37.74%
		Quota shareholder and owner/operator	20	37.74%
Crew	49	Crew	46	93.88%
		Other ¹	3	6.12%

¹ The "Other" grouping includes low-level participant groupings with less than 4 responses in order to protect the confidentiality of individuals that participated in this study.

Non-response bias analyses

Non-response analyses are a particularly important component of open-ended and qualitative data reporting when coding is used to quantify the qualitative results. It is important to recognize that a variety of biases could have been introduced into the qualitative data collected in this study due to non-responses. There are two main types of non-response: item non-response and unit non-response. Item non-response is the result of a respondent not providing a response to a specific question whereas unit non-response results from a particular individual not participating in the data collection as a whole (Lew et al. 2015). Item non-response bias could be introduced into a semi-structured interview study based on the quality of responses that interviewees provided. Respondents often use open-ended interviews and questions to reveal negative feelings and frustration, thus, referencing positive sentiments less frequently. In addition, the research topics may have been more or less interesting or relevant to each individual compared to the rest of the population. This could have affected individual decisions to participate in the study or not, their likelihood of bringing up a particular topic during an interview or responding to a question about the topic, as well as the overall quality of the responses in participant interviews. Unit non-response bias could be introduced by the characteristics of the individuals that agreed to participate in the study compared to those that refused or were not successfully contacted. It is important that each of these potential biases is taken into consideration when interpreting the results of qualitative studies like those presented here (Andrews 2004, Miller and Dumford 2014).

The interviewing team kept in close contact throughout the duration of the interviewing portion of the project in order to ensure that we were using definitions and interviewing strategies that were as similar as possible. We actively attempted to address potential item non-response biases by encouraging respondents to provide both positive and negative responses and to elaborate on comments to the extent of their abilities. For potential refusals, we provided context to the importance of all perspectives, both positive and negative, and informed and not informed, in order to encourage as many people to participate as possible.

The potential unit non-response bias is the most quantifiable. For the purposes of this report, we conducted statistical analyses to determine if there were any measurable biases in study participation for each participant type. The purpose of this unit non-response bias analysis in the preliminary report is to help guide the interpretation of the results for specific interview participant categories. Ultimately, the non-response bias variables can be regressed with the code frequency results to evaluate statistical significances for individual responses. This step has not been completed at this time.

To assess unit non-response, several variables were analyzed for differences between respondent and non-respondent populations within each participant type group. The variables that were used to test for bias differed by participant group, as the data available for each were different and potential sources of biases were different. The participant groups match those identified originally as the population frames used for initial participant contact. The categories are non-exclusive and include: quota shareholder, vessel owner, skipper, and crew. Statistical analyses were completed using the Stata software package and included two-sample t-tests with equal variances, Pearson's Chi-squared tests, or Spearman's rank correlation coefficient, depending on the type of data. Additionally, the variables selected for each participant group were input into a logistic regression model to assess any potential interaction between variables as they relate to the binary response variable (whether or not they participated in an interview). To be conservative, all statistical tests were evaluated at the significance level of $p \le 0.10$.

Quota shareholders

To assess possible unit non-response bias, differences between respondents and non-respondents among quota shareholders were evaluated using two variables. The first was a binary variable based on whether the shareholder was an initial recipient of quota shares or not. This variable was analyzed due to the suspected difference in motivations to discuss the interview topics, especially active participation, between those initially issued quota under Rationalization and those that had later bought into the fisheries. The second variable was the number of quota share units the individual or entity held in 2012. This variable summed quota share holdings for unique entities across share type (CVO, CVC, CPO, and CPC) and across fisheries. This variable was chosen due to potential differences in the perception of the applicability of the study to participants based on whether they derived significant income from their quota share holdings or not, which is proxied by the size of quota share holdings.

When comparing the initial allocation status of respondent versus non-respondent quota shareholders, there was not a statistically significant difference between the observed and expected values. Respondent quota shareholders were not significantly more or less likely to have been recipients of an initial allocation of quota shares in the crab fisheries (Table 7). However, when quota share holdings were assessed, the results indicated a statistically significant difference in the mean holdings of respondents as compared to non-respondents.

Respondents had, on average, larger quota share holdings than non-respondents ($p \le 0.05$; Table 8). A logistic regression confirmed this finding (Table 9). A possible explanation for this finding is that quota shareholders self-selected for participation based on the perception that the results of the study may impact them. Small quota shareholders may not feel they are affected by these issues and, therefore, may not be willing to spend the time to participate in a voluntary interview. Additionally, small quota shareholders may have affiliations with larger shareholders to whom they might have deferred their participation.

Vessel owners

The vessel owner group was analyzed for unit non-response using two variables: 2012 gross ex-vessel revenue and mean gross revenue over the period of 2005 through 2012. An analysis of vessel revenue can distinguish between marginal participants and those fully invested in the fisheries. These two groups may have felt differentially inclined to participate in the study based on their participation in the fisheries. However, there appears to be no significant difference between respondent and non-respondent vessel owners when looking at 2012 exvessel gross revenue and the mean of 2005 to 2012 ex-vessel gross revenue (Tables 10 and 11). A logistic regression model confirmed this finding (Table 12).

Table 7. -- Pearson's Chi-squared test results for quota shareholder response and initial allocation of quota shares.

	No initial	Yes initial		
	allocation	allocation	Chi ²	Prob
Non-response	31	180	1.2481	0.264
Response	26	109		
TOTAL	57	289		_

Table 8. -- Two-sample t-test with equal variances results for quota shareholder response and size of quota share holdings.

	Mean	St. Err.	N	P-value
Non-response	4426215	676974.4	211	0.0124
Response	7685642	1228611	135	

Table 9. -- Logistic regression for variables of interest for quota shareholder response.

	Coef.	Std. Err.	P value
2012 QS units held (thousands)	0.00003	0.00001	0.020
Initial allocation recipient	-0.46	0.297	0.126

Table 10. -- Two-sample t-test with equal variances results for vessel response and ex-vessel gross revenue in 2012.

	Mean	St. Err.	N	P-value
Non-response	3,098,245	568,080.6	14	0.5507
Response	3,474,471	258,260.6	69	

Table 11. -- Two-sample t-test with equal variances results for vessel response and mean exvessel gross revenue 2005 through 2012.

	Mean	St. Err.	N	P-value
Non-response	1,996,526	369,612	14	0.4427
Response	2,291,778	155,329.8	69	

Table 12. – Logistic regression for variables of interest for vessel owner response.

	Coef.	Std. Err.	P-value
2012 Ex-vessel revenue (thousands)	-0.0002	0.0005	0.654
Mean ex-vessel revenue 2005-2012 (thousands)	0.0005	0.0008	0.503

Skippers

For the skipper population, four variables were used to evaluate unit non-response. The first was the number of years post-rationalization that they were a registered skipper and that they harvested and landed crab. This variable was chosen to assess any potential differences in the interviewed population between newer entrants to the fisheries as compared to those who have participated since Rationalization was implemented. To develop this variable, we started with the registered skipper list from 2012 and determined the number of years prior that that individual skipper was active in the crab fisheries in this role. The second variable tested was a calculated ratio of skipper pay as a proportion of ex-vessel revenue. We hypothesized that there could be differences in motivations to participate in the study due to a skipper's participation on a boat with a higher or lower proportion of revenue being paid to the skipper. This variable was created using each vessel's total skipper compensation, as reported in the EDR, which was divided by estimated ex-vessel earnings for all BSAI crab fisheries derived from the CFEC gross earnings file. The third variable to assess skipper non-response was a calculated ratio of leased pounds, as reported on the 2012 EDR, to the overall poundage landed from the vessel as documented on fish tickets. This variable was selected to specifically test whether higher proportions of leased quota might have impacted individual skippers' decisions to participate in an interview. The fourth variable that was analyzed assigned skippers into stratified quartiles of 2012 median gross vessel revenue estimated from the CFEC gross earnings file. This variable was selected to evaluate whether participation on a high earning vessel as compared to a more marginal vessel in the fisheries influenced individual participation in the study. The first quartile corresponds to the skippers associated with the highest earning vessels in the fisheries and the fourth quartile corresponds to skippers associated with the lowest earning vessels in the fisheries. ¹⁰ For the purposes of running the logistic regression, the quartile variable was

3rd quartile: between \$1,822,608 and \$3,141,428 median gross vessel revenue; 21 vessels.

¹st quartile: greater than or equal to \$4,592,451 median gross vessel revenue; 21 vessels. 2nd quartile: between \$3,141,428 and \$4,592,451 median gross vessel revenue; 21 vessels.

⁴th quartile: less than \$1,822,608 median gross vessel revenue; 20 vessels.

transformed into 4 binary variables with a value of 1 representing inclusion in the quartile of interest and a value of 0 representing inclusion in any of the other 3 quartiles.

Respondent skippers and non-respondent skippers had a statistically significant difference in the number of years they had been active post-rationalization (at a significance level of 0.10) (Table 13). The skippers that participated in the study had, on average, more active years in the fishery post-rationalization than skippers that did not participate in the study (6.3) years as compared to 5.5 years). When assessed based on both the ratio of skipper pay to overall vessel earnings and the amount of leased quota pounds in relation to the overall pounds landed, there was not a significant difference between respondents and non-respondent skippers (Tables 14 and 15). The Spearman's rank correlation coefficient was significant, suggesting that there is a significant negative correlation between quartiles of vessel revenue and whether a skipper was interviewed (N = 116, Rho = -0.188, P-value = 0.044). Therefore, skippers associated with higher earning vessels were more likely to have participated in the study.

A logistic regression model revealed slightly different results than the four univariate tests (Table 16). When considered together, the ratio of leased pounds to overall pounds landed was significant in relation to response, as was the years in the fishery and the vessel revenue quartile variable. Skippers that did participate in the study and those that did not were significantly different when assessed based on quartiles of gross vessel revenue. Skippers from the lowest-earning vessels in the fishery for 2012 were less likely to have responded to the interview request. A pairwise correlation table revealed a correlation of -0.459 between the skipper pay ratio and the leased pound ratio which could be one of the complexities that is not captured in the univariate analysis, but is accounted for in the logistic regression. Therefore, the results of the non-response bias analyses suggest that the skippers that participated in the study were associated with vessels with a higher ratio of leased pounds to overall pounds landed, had been in the fishery for longer, and were associated with higher-earning vessels.

Table 13. -- Two-sample t-test with equal variances results for skipper response and number of active years post-rationalization.

	Mean	St. Err.	N	P-value
Non-response	5.47	0.36	58	0.0714
Response	6.32	0.30	53	

Table 14. -- Two-sample t-test with equal variances results for the ratio of skipper pay to exvessel gross revenue and skipper response.

	Mean	St. Err.	N	P-value
Non-response	0.067	0.004	60	0.303
Response	0.061	0.003	54	

Table 15. -- Two-sample t-test with equal variances results for the ratio of leased pounds to total pounds sold and skipper response.

	Mean	St. Err.	N	P-value
Non-response	0.625	0.049	60	0.261
Response	0.701	0.045	54	

Table 16. – Logistic regression for variables of interest for skippers.

	Coef.	Std. Err.	P-value
Ratio of leased pounds to overall pounds landed	1.158	0.701	0.099
Ratio of captain pay to overall gross ex-vessel revenue	-6.287	8.922	0.481
Years in the fishery post-rationalization	0.161	0.094	0.085
Binary variable for Quartile 1	1.149	0.773	0.137
Binary variable for Quartile 2	1.462	0.765	0.056
Binary variable for Quartile 3	2.026	0.794	0.011
Pseudo R ²	0.114		
Number of observations	110		

Crewmembers

For the crew population, we used the same four variables to evaluate non-response as were used for the skipper population. The first variable was years of participation in the fisheries post-rationalization. This variable was chosen to assess any potential differences in the interviewed population between newer entrants to the fisheries as compared to those who have participated since Rationalization. This variable was created using EDR records of crew license numbers from 2005 through 2012. The second variable was a calculated ratio of leased pounds, as reported on the 2012 EDR, to the overall poundage landed from the vessel as documented on fish tickets. This variable was selected to specifically test whether higher proportions of leased quota impacted individual crewmembers' decision to participate in an interview. The third variable tested was a calculated ratio of crew pay as a proportion of gross ex-vessel revenue. It was hypothesized that there could be differences in motivations to participate in the study due to a crewmember's association with a boat with a higher or lower proportion of revenue being paid to the crew. This variable was created using each vessel's total crew compensation, as reported in the EDR data for 2012, which was divided by estimated ex-vessel earnings for all BSAI crab fisheries, derived from the CFEC reported gross earnings. The fourth variable that was analyzed assigned crewmembers into stratified quartiles of 2012 median gross vessel revenue estimated from the CFEC gross earnings file. This variable was selected to evaluate whether participation on a higher earning vessel as compared to a more marginal vessel in the fisheries influenced individual participation in the study. The first quartile corresponds to the crewmembers associated with the highest earning vessels in the fisheries and the fourth quartile corresponds to crewmembers associated with the lowest earning vessels in the fisheries. ¹¹ Some crewmembers were associated with more than one vessel for the EDR data reporting year. If this produced conflicting data points for the variables using EDR data, the highest value was taken for that individual crewmember. For the purposes of running the logistic regression, the quartile variable

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¹ st quartile: greater than or equal to \$4,592,451 median vessel gross revenue; 21 vessels. 2nd quartile: between \$3,141,428 and \$4,592,451 median vessel gross revenue; 21 vessels. 3rd quartile: between \$1,822,608 and \$3,141,428 median vessel gross revenue; 21 vessels. 4th quartile: less than \$1,822,608 median vessel gross revenue; 20 vessels.

was transformed into 4 binary variables with a value of 1 representing inclusion in the quartile of interest and a value of 0 representing inclusion in any of the other 3 quartiles.

The difference in the number of post-rationalization years worked of respondent crewmembers compared to non-respondent crewmembers was not significantly different (Table 17). When compared on the basis of crew pay as a proportion of overall ex-vessel revenue, the difference in means of respondents and non-respondents was statistically significant at a p-value of 0.10 (Table 18). Crewmember respondents had a slightly higher ratio of crew pay to ex-vessel revenue (mean = 0.160) than did non-respondents (mean = 0.144). The difference between respondents and non-respondents for the ratio of leased pounds compared to overall pounds was statistically significant for crewmembers at a p-value of 0.10 (Table 19). Crewmembers that participated in the study were associated with vessels that had a lesser amount of leased crab as a proportion of the overall crab fished on the vessel.

When evaluated using quartiles of 2012 median vessel revenue, there was not a significant correlation between response and the quartile of vessel revenue that a crewmember was associated with (N = 581, Rho = 0.0029, p-value = 0.945). The results of a logistic regression model show that considering the interactions of all variables, the ratio of leased pounds to overall pounds landed is not significantly associated with response when other variables are considered, but whether a crewmember was associated with a vessel in the lowest quartile of revenue was a significant factor (Table 20). The logistic regression is likely a better estimate of the relationship between the variables analyzed and the response variable because it takes into account interactions between variables. Therefore, it is likely that the crewmembers interviewed are associated with higher earning vessels as compared to crewmembers that were not interviewed.

Additionally, it is important to note that, given that 63.3% of the crewmembers interviewed were ultimately contacted using supplemental contact information supplied by other study participants, it is possible there is a bias in the participant population of crewmembers; however, we do not have meaningful data on why individuals recommended particular crewmembers and provided supplemental contact information; therefore, it is difficult to quantitatively evaluate this.

Table 17. -- Two-sample t-test with equal variances results for crewmember response and number of years in fishery post-rationalization.

	Mean	St. Err.	N	P-value
Non-response	3.12	0.09	535	0.2655
Response	3.46	0.26	46	

Table 18. -- Two-sample t-test with equal variances results for the ratio of crew pay to ex-vessel gross revenue and crew response.

	Mean	St. Err.	N	P-value
Non-response	0.144	0.002	535	0.051
Response	0.160	0.008	46	

Table 19. -- Two-sample t-test with equal variances results for the ratio of leased pounds to total pounds sold and crew response.

	Mean	St. Err.	N	P-value
Non-response	0.658	0.016	535	0.091
Response	0.560	0.057	46	

Table 20. – Logistic regression for variables of interest and crewmember response.

	Coef.	Std. Err.	P value
Ratio of leased pounds to overall pounds landed	-0.294	0.489	0.548
Ratio of crew pay to overall gross ex-vessel revenue	3.909	3.010	0.207
Years in the fishery post-rationalization	0.054	0.076	0.475
Binary variable for Quartile 1	0.802	0.604	0.184
Binary variable for Quartile 2	0.733	0.627	0.243
Binary variable for Quartile 3	1.273	0.584	0.029
Pseudo R ²	0.034		
Number of observations	581		

As a next step in this research to further evaluate the variables that showed significant differences between respondents and non-respondents, the results of the logistic regression models could be structured to provide appropriate weights that could be used to adjust the code frequencies by respondent type (similar to that done by Lew et al. 2015). This step may be completed at a future date. At this juncture, we have not applied weights to the code frequencies to account for any non-response bias found in the tests reported in Tables 7 through 22. Absent the use of weighting, the results presented here must be interpreted taking the potential biases revealed here into account.

Data analysis

All of the audio recorded interviews were transcribed and analyzed using the data analysis software package NVivo. Descriptive coding was used to organize the interviews into parent codes that emerged during the semi-structured interviews (see the first column of Table 20 for an example of parent codes related to access to quota shares; Saldaña 2009). Within the structure of parent codes, magnitude, and in vivo coding were used to delve deeper into specific sub-codes (see the second column of Table 20 for an example of parent codes related to access to quota shares). Magnitude coding was used for themes that elicited a positive or negative response as to whether the participant was familiar with a specific topic. The bulk of the analysis used in vivo coding to draw out content precisely as reported by respondents. In vivo coding prioritizes the way participants conceptualize the topics discussed (Saldaña 2009). Additionally, it is a method of employing grounded theory in which themes are developed based on the data themselves (Miles and Huberman 1994). This framework for data analysis allowed the analysis to stay true to what respondents conveyed, rather than predetermined ideas based on existing theories.

A total of 212 codes were developed based on an initial coding effort of a subset of interviews that varied based on respondent type, interviewer, and timing of interview relative to

the overall data collection timeframe. Frequency counts of codes were calculated and distributions were broken out by fishery participant categories to provide further illumination of results. It is important to note that due to the semi-structured nature of the interviews, the frequency analysis of response codes is based on presence of certain topics in individual interviews and the reader should not infer results from the absence of certain codes. For example, if 82% of respondents expressed a given opinion, it cannot be inferred that the other 18% hold the opposite opinion; those 18% simply did not discuss their views on that issue.

Table 21 shows the total number of responses analyzed by respondent type. Please note that the number of responses in Table 21 is not the same as the number of individuals interviewed reported in Tables 5 and 6, given that group interview participants are consolidated into one response per interview for the purposes of the analysis. Table 22 breaks down the primary respondent types into mutually exclusive categories. The crewmember category of respondents includes participants that have additional roles in the fishery; for example, as quota shareholders. These respondent categories were lumped together in Table 22 due to the small sample size of those additional categories. Respondents were grouped after responses were compared to ensure that the results were similar across those groups. Similarly, a few participants that were skippers and minority owners in a vessel, but do not hold quota shares were lumped into the skipper category. This was, again, due to small sample sizes and concern over protecting the identity of respondents as well, but with the understanding that responses were similar with those in the general skipper category.

Table 21. -- Total non-exclusive participant pool based on unique interviews.

Respondent type	N
CDQ representatives	5
Crewmembers	48
Expert respondents	10
Quota shareholders	135
Vessel owners	52
Skippers	52
TOTAL	207

Table 22. -- Total respondent mutually-exclusive participant pool based on unique interviews.

Respondent type	N
CDQ representatives	5
Crewmembers ¹	48
Expert respondents	10
Passive quota shareholders	64
Quota shareholder and owner/operators	20
Quota shareholder and skippers	20
Quota shareholder and vessel owners	28
Non-quota shareholding skippers ²	12
TOTAL	207

¹Includes crew who have other roles in addition to being crewmembers; for example, as quota shareholders.

²Includes skippers that are minority owners of vessels but do not hold quota shares.

RESULTS

This results section is organized into three sections based on the three main interview topic areas covered with interviewees: (1) access to quota shares, (2) active participation, and (3) leasing. Results are presented for aggregated groups of interviewees based on their role in the fishery. Results are first presented for the overlapping fishery participant categories: quota shareholder, vessel owner, skipper, crew, CDQ representative, and expert respondent. To provide more detail, some results are then parsed into mutually-exclusive fishery participant categories. It is important to note that the results of the study represent a summary of perceptions among the distinct populations regarding various features of the Crab Rationalization Program and voluntary measures put in place by the cooperatives. The study does not attempt to assess the Rationalization Program relative to the Council's stated goals, or the validity or accuracy of survey respondents' subjective views. The findings reported here simply report the relative frequency with which common perceptions (or possibly misperceptions) occur. As discussed below, every effort was made to avoid any source of systematic bias and ensure the findings of the study are widely representative of perceptions among the respective participant groups. The reader is cautioned to observe these caveats in interpreting the findings of the study.

The results are generally structured with the number of interview participants of a particular category that spoke to a specific theme given in parentheses (i.e., n = X) and the proportion that this number represents as compared to the number of interview participants in that particular category as a whole.

Access to quota shares

One of the central themes of this research was to understand different participants' perception of access, or potential access, to quota share markets. We queried interviewees on their knowledge and understanding of the ROFO program and more broadly about their perceptions and experiences with the quota share market (see Tables 23 and 24 for a breakdown of interviewees' opinions on the ROFO program and quota share market). Regarding familiarity with the ROFO program, 63.7% of quota shareholders (n = 86), 76.9% of vessel owners (n = 40), and 82.7% of skippers (n = 43) reported that they had heard of the program. Within the skipper participant group, the majority of interviewed skippers who do not have quota shares (n = 8) and who do have quota shares (n = 18) were familiar with the ROFO program. However, the majority of interviewed skippers that were aware of the ROFO program had not looked into the program. For the skipper category as a whole, only 17.3% reported that they had signed up for ROFO (n = 9), including skippers that hold quota shares (n = 4), are also quota shareholding owner/operators (n = 4), and those that do not hold quota shares (n = 1). Because of this, many skippers interviewed were not able to provide any feedback on how the program is working.

Respondents were asked to elaborate on any experiences they may have had with the ROFO program. Overall, 7.7% of skippers (n = 4) mentioned that the process of buying quota through the ROFO program was straightforward. Vessel owners (n = 4) and quota shareholders (n = 9) reported that their experience buying or selling quota that had to go through the ROFO program was not perceivably more difficult than a transaction outside of ROFO. In general, 17.3% of vessel owners (n = 9) expressed that they perceive that the ROFO program is working, which includes some vessel owners who hold quota shares (n = 4) and owner-operators who hold

quota shares (n = 4). For quota shareholders overall, 16.3% indicated (n = 22) that they felt that ROFO was a good idea, but could not provide an assessment of how well they think the program is working. These interviewees included proportionally more quota shareholder skippers (n = 5) and quota shareholder owner-operators (n= 4). However, a total of 10 passive quota shareholders also stated something to this effect. Conversely, a few (n = 5) skippers that were interviewed stated that they think the ROFO program was not a good solution to help skippers and crewmembers purchase quota shares.

Many interviewees were probed for ideas about how best to convey information to skippers and crew about the ROFO program. Skippers suggested using the crew licensing process through ADF&G as an avenue to promote the program (n = 3), or having NMFS (n = 1), or trade publications (n = 2) promote it would provide good promotion avenues. Additionally, some interviewees suggested encouraging skippers to give information to crew about the ROFO program (5 quota shareholders, 3 vessel owners, 4 skippers).

Interviewees elaborated on this sub-theme by sharing their perceptions of the quota share market, including barriers to purchase, availability of quota, considerations in buying quota, and financing for quota share purchases. Interviewees brought up the complexity and stress of navigating the program as a barrier to quota share purchase, which was reported by 11.5% of vessel owners (n = 6). Interviewees in many of the fishery participant categories brought up perceptions of crewmembers' financial well-being as a barrier for them to be able to purchase quota shares, including 25% of vessel owners (n = 13), 18.5% of quota shareholders (n = 25), and 21.2% of skippers (n = 11). Proportionally, this viewpoint was most common among owner-operators who own quota shares (n = 6, 30.0%). Across all fishery participant categories, interviewees most commonly conveyed that they perceived the price of quota shares to be the biggest barrier to purchasing quota shares. Over 60% of respondents in the vessel owner (n = 33) and skipper fishery participant categories (n = 34), and 43.7% of the quota shareholder interviewees (n = 59), spoke to the difficulties of affording the quota share price in acquiring shares. Specifically, the majority of interviewed skippers who do not have quota shares (n = 8) noted that they perceive pricing to be prohibitive to their ability to purchase quota.

The availability of quota shares on the market was another salient topic with many respondents. There was a strong perception across respondent types regarding a lack of quota shares available for purchase, including between a third and a half of quota shareholders (n = 45), vessel owners (n = 20), and of skippers (n = 26). More specifically, of owner-operators who own quota shares and skippers who do not own quota shares (n = 7), over half reported that there was a lack of quota available for sale (n = 11), as well as 40% of skippers who own quota shares (n = 8), and 40.0% of CDQ representatives (n = 2). On this subject, many interviewees pointed to the presence of differences in market or buying power of participants. A total of 44.2% of vessel owners (n = 23) and 46.2% of skippers (n = 24) indicated that they perceived this was an influence on the availability of quota. In particular, over half of skippers who own quota shares (n = 12) mentioned this. Interviewees who elaborated on the nature of the buying power differences most often mentioned the unique capability of the CDQ groups to purchase large blocks of quota shares (36.5% of skippers (n = 19)). Respondents indicated that a large cash flow and the ability to use quota allocations as collateral were two primary drivers behind one's ability to secure the resources to make such purchases.

To better understand the motivations of individuals considering, or not considering, a quota share purchase, interviewers inquired on why the interviewee may or may not have thought about making a purchase. For interviewed skippers, the most frequently cited

consideration was the length of time to pay off the investment (28.9% of interviewees, n=15) which was often conveyed to be around 10 years. Based on the prevalence of this sub-topic in the interviews, the amortization was more of a concern of skippers who hold quota shares (40.0% of respondents, n=8) than of owner-operators who hold quota shares (25% of respondents, n=5). Another consideration of skippers who were interviewed was their age and the number of years they felt they would continue or wanted to continue to work on a crab vessel; this consideration was brought up by 15.4% of skippers (n=8).

Financing for quota share purchases was also an area of discussion in the interviews. Only 5.7% of skippers (n = 3) said they had looked into the loan program offered through the National Oceanic and Atmospheric Administration (NOAA) and that they found it to be difficult to navigate. However, respondents did not communicate whether their experience with the NOAA loan program was different than private financing options. Of the interviewed skippers, 9.6% (n = 5) specifically noted that the NOAA loan program was not available when the BSAI Crab Rationalization Program began, which delayed or impeded their use of federal financing for quota share purchases. Some vessel owners (n = 7) and quota shareholders (n = 10) indicated that they perceive many crewmembers to lack credit worthiness with respect to being able to secure financing for a quota share purchase. Specifically on the subject of crew making quota share purchases, there were some owner-operators (n = 4) and vessel owners who hold quota shares (n = 4)= 3) that perceived that many crewmembers were not good candidates for financing. In spite of the discussion about barriers to the purchase of quota shares, many respondents also talked about the incentives to purchasing quota shares. A total of 9.6% of interviewed skippers (n = 5) stated that they saw the purchase of quota shares as a commitment to continuing to fish crab. Additionally, 13.5% of skippers (n = 7) saw the purchase of quota shares as a means to solidify their future in the crab industry. Over all interviewees, only 3.7% (n = 5) of quota shareholders, all specifically passive quota shareholders, highlighted the advantages of the investment value of quota shares as an incentive to purchasing quota shares.

Table 23. -- Non-exclusive fishery participant categories: Interviewee opinions on and perceptions of access to quota shares.

	Non-exclusive fishery participant categories: interviewee	QS holder	Vessel	Skipper	Crew	CDQ reps	Expert
	Familiar with ROFO	135 86 (63.7%)	52 40 (76.9%)	52 43 (82.7%)	48 13 (27.1%)	5 5 (100.0%)	10 3 (30.0%)
Familiarity	Not familiar with ROFO	11 (8.1%)	3 (5.8%)	5 (9.6%)	30 (62.5%)	0 (0.0%)	0 (0.0%)
with ROFO	Signed up for ROFO	9 (6.7%)	4 (7.7%)	9 (17.3%)	1 (2.1%)	0 (0.0%)	0 (0.0%)
	ROFO didn't negatively affect process of buying or selling quota	9 (6.7%)	4 (7.7%)	3 (5.8%)	0 (0.0%)	0 (0.0%)	1 (10.0%)
Experience	Process buying quota through ROFO was straightforward	4 (3.0%)	1 (1.9%)	4 (7.7%)	0 (0.0%)	0 (0.0%)	0 (0.0%)
with and evaluation of	ROFO appears to be working	14 (10.4%)	9 (17.3%)	5 (9.6%)	1 (2.1%)	1 (20.0%)	2 (20.0%)
ROFO	ROFO was good idea, not sure how it's working	22 (16.3%)	7 (13.5%)	10 (19.2%)	1 (2.1%)	1 (20.0%)	0 (0.0%)
	ROFO is not a good solution to problem	6 (4.4%)	3 (5.8%)	5 (9.6%)	2 (4.2%)	0 (0.0%)	0 (0.0%)
	Lack of quota available	45 (33.3%)	20 (38.5%)	26 (50.0%)	18 (37.5%)	2 (40.0%)	2 (20.0%)
Availability of	Differences in market power of participants	53 (39.3%)	23 (44.2%)	24 (46.2%)	13 (27.1%)	1 (20.0%)	2 (20.0%)
quota	CDQ groups have greater market power than others	38 (28.1%)	17 (32.7%)	19 (36.5%)	9 (18.8%)	1 (20.0%)	1 (10.0%)
Barriers to	Crew financial well-being	25 (18.5%)	13 (25.0%)	11 (21.2%)	1 (2.1%)	1 (20.0%)	3 (30.0%)
purchasing	Lack of open market for quota	18 (13.3%)	8 (15.4%)	12 (23.1%)	9 (18.8%)	0 (0.0%)	1 (10.0%)
quota shares	Quota price	59 (43.7%)	33 (63.5%)	34 (65.4%)	35 (72.9%)	1 (20.0%)	2 (20.0%)
Incentives to	If you're going to keep fishing you should have quota	4 (3.0%)	1 (1.9%)	5 (9.6%)	6 (12.5%)	0 (0.0%)	0 (0.0%)
purchasing	Investment piece	6 (4.4%)	1 (1.9%)	1 (1.9%)	1 (2.1%)	0 (0.0%)	0 (0.0%)
quota shares	Solidifying future in the fishery	9 (6.7%)	3 (5.8%)	7 (13.5%)	3 (6.3%)	0 (0.0%)	1 (10.0%)
	Age and life on deck	11 (8.1%)	6 (11.5%)	8 (15.4%)	5 (10.4%)	0 (0.0%)	0 (0.0%)
Considerations	Complexity and stress of program	9 (6.7%)	6 (11.5%)	1 (1.9%)	3 (6.3%)	0 (0.0%)	1 (10.0%)
in purchasing	Length of time to pay off investment	17 (12.6%)	8 (15.4%)	15 (28.8%)	9 (18.8%)	0 (0.0%)	2 (20.0%)
quota shares	Other investments that make better sense	7 (5.2%)	3 (5.8%)	3 (5.8%)	7 (14.6%)	0 (0.0%)	0 (0.0%)
	Unsure of long-term commitment to fishing	8 (5.9%)	3 (5.8%)	5 (9.6%)	10 (20.8%)	0 (0.0%)	1 (10.0%)
	Issues with crew credit worthiness	10 (7.4%)	7 (13.5%)	6 (11.5%)	0 (0.0%)	0 (0.0%)	1 (10.0%)
Financing	Haven't looked into financing options	0 (0.0%)	0 (0.0%)	0 (0.0%)	9 (18.8%)	0 (0.0%)	0 (0.0%)
quota share purchases	NOAA financing wasn't available at beginning	9 (6.7%)	1 (1.9%)	5 (9.6%)	2 (4.2%)	0 (0.0%)	2 (20.0%)
I	NOAA loan program difficult to navigate	4 (3.0%)	1 (1.9%)	3 (5.8%)	2 (4.2%)	0 (0.0%)	1 (10.0%)

Table 24. – Mutually exclusive fishery participant categories: Interviewee opinions on and perceptions of access to quota shares.

Table 24. –	Mutually exclusive fishery participant cates	perceptions of access to quota shares.							
		Passive QS Holder	QS holder and vessel owner	QS holder and owner/ operator	QS holder and skipper	Skipper	All crew	CDQ reps	Expert respondents
	N	64	28	20	20	12	48	5	10
F. 11. 1.	Familiar with ROFO	28 (43.8%)	21 (75.0%)	17 (85.0%)	18 (90.0%)	8 (66.7%)	13 (27.1%)	5 (100.0%)	3 (30.0%)
Familiarity with ROFO	Not familiar with ROFO	9 (14.1%)	0 (0.0%)	1 (5.0%)	1 (5.0%)	3 (25.0%)	30 (62.5%)	0 (0.0%)	0 (0.0%)
with ROI O	Signed up for ROFO	1 (1.6%)	0 (0.0%)	4 (20.0%)	4 (20.0%)	1 (8.3%)	1 (2.1%)	0 (0.0%)	0 (0.0%)
	ROFO did not negatively affect process of buying or selling quota	5 (7.8%)	1 (3.6%)	3 (15.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	1 (20.0%)	1 (10.0%)
Experience with and	Process of buying quota through ROFO was straightforward	0 (0.0%)	0 (0.0%)	1 (5.0%)	3 (15.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)
evaluation of ROFO	ROFO appears to be working	4 (6.3%)	4 (14.3%)	4 (20.0%)	1 (5.0%)	0 (0.0%)	1 (2.1%)	1 (20.0%)	2 (20.0%)
KOFO	ROFO was good idea, not sure how it's working	10 (15.6%)	3 (10.7%)	4 (20.0%)	5 (25.0%)	1 (8.3%)	1 (2.1%)	1 (20.0%)	0 (0.0%)
	ROFO is not a good solution to problem	2 (3.1%)	1 (3.6%)	1 (5.0%)	2 (10.0%)	2 (16.7%)	2 (4.2%)	0 (0.0%)	0 (0.0%)
Availability of quota	Lack of quota available	16 (25.0%)	9 (32.1%)	11 (55.0%)	8 (40.0%)	7 (58.3%)	18 (37.5%)	2 (40.0%)	2 (20.0%)
	Differences in market power of participants	19 (29.7%)	13 (46.4%)	9 (45.0%)	12 (60.0%)	3 (25.0%)	13 (27.1%)	1 (20.0%)	2 (20.0%)
1	CDQ groups have greater market power than others	14 (21.9%)	7 (25.0%)	10 (50.0%)	7 (35.0%)	2 (16.7%)	9 (18.8%)	1 (20.0%)	1 (10.0%)
Barriers to	Crew financial well-being	9 (14.1%)	7 (25.0%)	6 (30.0%)	3 (15.0%)	2 (16.7%)	1 (2.1%)	1 (20.0%)	3 (30.0%)
purchasing	Lack of open market for quota	4 (6.3%)	4 (14.3%)	3 (15.0%)	7 (35.0%)	2 (16.7%)	9 (18.8%)	0 (0.0%)	1 (10.0%)
quota shares	Quota price	15 (23.4%)	16 (57.1%)	14 (70.0%)	12 (60.0%)	8 (66.7%)	35 (72.9%)	1 (20.0%)	2 (20.0%)
Incentives to	If you're going to keep fishing you should have quota	1 (1.6%)	0 (0.0%)	1 (5.0%)	1 (5.0%)	3 (25.0%)	6 (12.5%)	0 (0.0%)	0 (0.0%)
purchasing	Investment piece	5 (7.8%)	0 (0.0%)	1 (5.0%)	0 (0.0%)	0 (0.0%)	1 (2.1%)	0 (0.0%)	0 (0.0%)
quota share	Solidifying future in the fishery	1 (1.6%)	0 (0.0%)	3 (15.0%)	4 (20.0%)	0 (0.0%)	3 (6.3%)	0 (0.0%)	1 (10.0%)
	Age and life on deck	2 (3.1%)	2 (7.1%)	4 (20.0%)	3 (15.0%)	1 (8.3%)	5 (10.4%)	0 (0.0%)	0 (0.0%)
Considerations	Complexity and stress of program	3 (4.7%)	5 (17.9%)	1 (5.0%)	0 (0.0%)	0 (0.0%)	3 (6.3%)	0 (0.0%)	1 (10.0%)
in purchasing quota	Length of time to pay off investment	3 (4.7%)	1 (3.6%)	5 (25.0%)	8 (40.0%)	2 (16.7%)	9 (18.8%)	0 (0.0%)	2 (20.0%)
	Other investments that make better sense	2 (3.1%)	2 (7.1%)	1 (5.0%)	2 (10.0%)	0 (0.0%)	7 (14.6%)	0 (0.0%)	0 (0.0%)
	Unsure of long-term commitment to fishing	2 (3.1%)	1 (3.6%)	2 (10.0%)	2 (10.0%)	1 (8.3%)	10 (20.8%)	0 (0.0%)	1 (10.0%)
Financing quota share	Issues with crew credit worthiness	1 (1.6%)	3 (10.7%)	4 (20.0%)	2 (10.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	1 (10.0%)
	Haven't looked into financing options	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	9 (18.8%)	0 (0.0%)	0 (0.0%)
purchases	NOAA financing wasn't available at beginning	5 (7.8%)	0 (0.0%)	1 (5.0%)	3 (15.0%)	1 (8.3%)	2 (4.2%)	0 (0.0%)	2 (20.0%)
=	NOAA loan program difficult to navigate	2 (3.1%)	1 (3.6%)	0 (0.0%)	1 (5.0%)	2 (16.7%)	2 (4.2%)	0 (0.0%)	1 (10.0%)

Active participation

The second main theme of this inquiry focused on active participation in the fisheries. The interviewers explored perceptions of active participation with regards to CVO quota share ownership (see Tables 25 and 26 for a breakdown of how interviewees viewed active participation). In conversations about active participation, respondents were directed to consider CVO shares, rather than CVC shares, which have different requirements for ownership. Within the non-exclusive participants categories, 27.4% of quota shareholders (n = 37) and 36.5% of vessel owners (n = 19) conveyed that they do not see a need in the fishery for an additional active participation requirement on CVO shares. More specifically in the mutually-exclusive fishery participant categories, 46.4% of vessel owners who hold quota shares (n = 13) and 26.6%of passive quota shareholders (n = 17) conveyed that they do not agree with creating a formal requirement beyond what already exists for quota share ownership. These interviewees conveyed that an additional mandated active participation requirement could have a negative impact on those fisheries participants who had retired using royalties from their initial allocation to support themselves; a view expressed by 17.3% of vessel owners (n = 9) and 11.9% of quota shareholders (n = 16). However, more quota shareholder interviewees indicated a need for an additional formal requirement for active participation than did not see the need (38.5% (n = 52)versus the aforementioned 27.4%). Additionally, a number of vessel owners (n = 20) and skippers (n = 34) more strongly indicated views favorable to a formal participation requirement that would go beyond the existing regulations. At a finer scale, between a half and three quarters of interviewed owner-operators who hold quota shares (n = 11), skippers who hold quota shares (n = 14), and skippers who do not hold quota shares (n = 9) communicated that they perceived a need for an active participation requirement on quota share ownership in the fishery.

In addition, 36.5% of skippers (n = 19) spoke to their concern that there is a problem of absentee (or passive) quota ownership in the fishery. Within that group, the view was expressed more by skippers who hold quota shares (n = 9) and skippers who do not hold quota shares (n = 9)5). One of the principal problems interviewees cited relates to sharing the risk of fishing. A quarter of interviewed skippers (n = 14) indicated that they perceive that many passive quota shareholders do not share in the financial risk or expenses of fishing. Within the skipper respondent category, this opinion was expressed proportionally more by skippers who have quota shares (n = 8) than by owner-operators who have quota shares (n = 3). Some respondents offered up ideas for elements of an additional active participation requirement. The study did not attempt to systematically identify or assess support for specific requirements for active participation; however, several specific arrangements were cited by multiple respondents. The most common suggestion was analogous to a previously analyzed, and ultimately tabled, consideration by the NPFMC of a vessel ownership requirement on CVO shares; which was suggested here by 25.0% of vessel owners (n = 13) and 30.8% of skippers (n = 16). This trend was specifically driven by owner-operators who hold quota shares (n = 6) and skippers who hold guota shares (n = 9) that were interviewed. In addition, a few guota shareholders (6.7%) of those interviewed, n = 9) reported that they supported a restriction on non-active quota shareholders purchasing more shares. A few skippers who do not own quota shares (n = 4) also mentioned a need to disallow initially allocated quota from being passed down through families to nonfishing family members.

Table 25. – Non-exclusive fishery participant categories: Interviewee perceptions about active participation by percentage.

		Quota shareholder	Vessel owner	Skipper	All crew	CDQ reps	Expert respondents
	N	135	52	52	48	5	10
Fishery does not need additional	Fishery does not need additional active participation requirement	37 (27.4%)	19 (36.5%)	6 (11.5%)	5 (10.4%)	1 (20.0%)	1 (10.0%)
active participation requirement	Additional active participation requirements would negatively impact initial recipients	16 (11.9%)	9 (17.3%)	4 (7.7%)	1 (2.1%)	0 (0.0%)	0 (0.0%)
Fishery needs	Fishery needs additional active participation requirements	52 (38.5%)	20 (38.5%)	34 (65.4%)	25 (52.1%)	1 (20.0%)	2 (20.0%)
additional active participation	Absentee ownership in fishery is an issue	20 (14.8%)	8 (15.4%)	19 (36.5%)	17 (35.4%)	1 (20.0%)	1 (10.0%)
definition	Unequal risk sharing with QS holders	17 (12.6%)	7 (13.5%)	14 (26.9%)	9 (18.8%)	0 (0.0%)	2 (20.0%)
D-44'-14'	Vessel ownership requirement	26 (19.3%)	13 (25.0%)	16 (30.8%)	3 (6.3%)	0 (0.0%)	2 (20.0%)
Potential active participation	Passive QS holders should not be allowed to purchase more quota	9 (6.7%)	2 (3.8%)	2 (3.8%)	0 (0.0%)	0 (0.0%)	0 (0.0%)
requirement components	Quota shouldn't be passed down to non-active family members	5 (3.7%)	2 (3.8%)	5 (9.6%)	5 (10.4%)	0 (0.0%)	1 (10.0%)
	Boots on deck	7 (5.2%)	2 (3.8%)	5 (9.6%)	7 (14.6%)	0 (0.0%)	0 (0.0%)

Table 26. – Mutually exclusive fishery participant categories: Interviewee perceptions about active participation.

		Passive quota shareholder	Quota shareholder and vessel owner	Quota shareholder and owner/operator	Quota shareholder and skipper	Non-quota shareholding skipper	All crew	CDQ reps	Expert
	N	64	28	20	20	12	48	5	10
Fishery does not need additional	Fishery does not need additional active participation requirement	17 (26.6%)	13 (46.4%)	5 (25.0%)	1 (5.0%)	0 (0.0%)	5 (10.4%)	1 (20.0%)	1 (10.0%)
active participation requirement	Additional active participation requirements would negatively impact initial recipients	6 (9.4%)	6 (21.4%)	2 (10.0%)	1 (5.0%)	1 (8.3%)	1 (2.1%)	0 (0.0%)	0 (0.0%)
Fishery needs	Fishery needs additional active participation requirements	18 (28.1%)	7 (25.0%)	11 (55.0%)	14 (70.0%)	9 (75.0%)	25 (52.1%)	1 (20.0%)	2 (20.0%)
additional active participation	Absentee ownership in fishery is an issue	4 (6.3%)	2 (7.1%)	5 (25.0%)	9 (45.0%)	5 (41.7%)	17 (35.4%)	1 (20.0%)	1 (10.0%)
definition	Unequal risk sharing with QS holders	2 (3.1%)	4 (14.3%)	3 (15.0%)	8 (40.0%)	3 (25.0%)	9 (18.8%)	0 (0.0%)	2 (20.0%)
	Vessel ownership requirement	4 (6.3%)	7 (25.0%)	6 (30.0%)	9 (45.0%)	1 (8.3%)	3 (6.3%)	0 (0.0%)	2 (20.0%)
Potential active participation	Passive QS holders should not be allowed to purchase more quota	6 (9.4%)	1 (3.6%)	1 (5.0%)	1 (5.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)
requirement components	Quota shouldn't be passed down to non-active family members	2 (3.1%)	0 (0.0%)	1 (5.0%)	2 (10.0%)	2 (16.7%)	5 (10.4%)	0 (0.0%)	1 (10.0%)
_	Boots on deck	3 (4.7%)	0 (0.0%)	1 (5.0%)	2 (10.0%)	2 (16.7%)	7 (14.6%)	0 (0.0%)	0 (0.0%)

Leasing

Leasing activity comprised the third central topic of the interviews. The greatest number of interviewees was most interested in discussing this topic. Every interviewee participant category predominantly expressed familiarity with the voluntary lease rate caps currently in effect (60.0% of CDQ representatives (n = 3), 59.6% of skippers (n = 31), 57.7% of vessel owners (n = 30), and 45.9% of quota shareholders (n = 62). Of the mutually-exclusive fishery participant categories, passive quota shareholders were the least likely to be familiar with the voluntary cap (34.4%, n = 22) (Tables 27 and 28). In addition, interviews provided indications of respondents' perceptions regarding consistency of compliance with voluntary lease rate caps and, to a lesser extent, expectations regarding the ultimate efficacy of the rate caps. It should be noted that many interviewees provided broad statements about the overall compliance with the lease rate caps, while a few qualified their assessment by describing compliance as partial. All interviewees that expressed some level of compliance that is less than the majority were aggregated into a grouping that represents all other levels of compliance.

Overall, 28.9% of quota shareholders (n = 39) and 32.7% of vessel owners (n = 17)expressed that they perceive the industry to be in 100% compliance with the voluntary lease rate caps. Looking more closely at fishery participant categories, equal numbers of interviewed vessel owners who hold quota shares believe that there is 100% compliance with the voluntary lease rate caps (28.6%, n = 8) as those that believe there is not yet 100% compliance (28.6%, n = 8). Some vessel owners communicated that they perceive that the majority of people are in compliance with the caps (15.4% of interviewees, n = 8). However, many interviewees expressed that the current compliance level is less than the majority of the industry. This view was suggested by 51.9% of skippers (n = 27) and 40.4% of vessel owners (n = 21). When looking at the sub-categories of participants, approximately half of interviewed owner-operators who hold quota shares (50.0%, n = 10), skippers who hold quota shares (60.0%, n = 12), and skippers that do not hold quota shares (41.7%, n = 5) conveyed that they believe not all parties in the industry are in compliance with the lease rate caps. Some vessel owners (n = 7) and some quota shareholders (n = 10) stated that they believe lease rates are, and should be, regulated by the market place rather than management entities. In interpreting respondent's perceptions with respect to both compliance and efficacy, we do not attempt to assess the source or accuracy of the information on which those views are based. Additional context is provided in the discussion, including cooperatives' stated goals in implementing the voluntary rate caps and empirical data on pounds of harvest quota leased and average lease rates reported by crab vessels in annual EDRs.

In a broader sense, conversations about leasing activity and lease rates were a major component of the interviews due to many interviewees' strong opinions on the subject. In results shown below, it was often unclear during interviews whether interviewee comments were indicative of negative associations applied to outcomes of the quota market, which is functioning as intended under the Crab Rationalization program, or whether they reflect suspicions of unintended distortions occurring in the market resulting from flaws in its design or unauthorized behavior by some participants. These issues are also addressed further in the discussion.

Many interviewees offered opinions as to what they view as the major drivers of lease rates in the crab fisheries. One of the most common perceptions across participant types was that fishermen looking to catch more crab will compete for crab quota by offering to pay higher lease prices for crab to passive quota shareholders. This pattern was noted by 44.2% of vessel owners

(n = 23) and 50% of skippers (n = 26) that were interviewed for this study. Several interviewees in the vessel owner participant category (n = 10) reported that gains from quota leased at high rates still exceeded the lease cost and additional harvest cost of that crab when they either had an initial quota allocation or when they were able to lease other quota at a lower rate. Additionally, 26.9% of interviewees in this participant group (n = 14) conveyed that they perceived that lease rates (i.e., the 'rent' or price of leasing) had risen precipitously in the fisheries as passive quota shareholders sought more money from vessel owners for their leased quota.

Respondents also shared general impressions and perceptions about leasing activity in the crab fisheries. A total of 40.4% of skippers (n = 21) who were interviewed reported that they were most recently on a vessel in which at least some portion of the quota was part of the original allocation to the vessel owner. Overall, when asked to describe what percentage of fished quota was leased in versus originally allocated quota on their fishing vessel, 45.0% of owner-operators who hold quota shares (n = 9), 40% of skippers who hold quota shares (n = 9), 25% of skippers who do not (n = 13), and 17.3% of interviewed vessel owners (n = 7) reported that on the vessel on which they work most of the crab that is landed has lease payments that are deducted. Several vessel owners (32.7%, n = 17) reported that some of the quota fished on the vessel is not leased to the vessel. However, a handful of skippers who were interviewed made mention of leasing practices in the fleet in which vessel owners' are charging their crew lease rates on the proceeds from originally allocated quota (n = 15). These perceptions were shared by a third of skippers who hold quota shares (35%, n = 7) and skippers who do not own quota shares (33.3%, n = 4). In addition, more often than not, interviewees indicated that while the practice does not occur on the vessel on which they work, they think the practice is common in the fleet.

Table 27. – Non-exclusive fishery participant categories: Interviewee perceptions about leasing.

		Quota shareholder	Vessel	Skipper	All crew	CDQ reps	Expert respondents
	N	135	52	52	48	5	10
Knowledge of	Familiar with voluntary lease rate cap	62 (45.9%)	30 (57.7%)	31 (59.6%)	9 (18.8%)	3 (60.0%)	1 (10.0%)
voluntary lease rate cap	Not familiar with voluntary lease rate cap	11 (8.1%)	4 (7.7%)	6 (11.5%)	22 (45.8%)	0 (0.0%)	0 (0.0%)
	Full compliance with voluntary lease rate cap	39 (28.9%)	17 (32.7%)	12 (23.1%)	4 (8.3%)	2 (40.0%)	0 (0.0%)
Experience with	Majority in compliance with voluntary lease rate cap	15 (11.1%)	8 (15.4%)	7 (13.5%)	1 (2.1%)	0 (0.0%)	0 (0.0%)
voluntary	Less than full compliance with voluntary lease rate cap	36 (26.7%)	21 (40.4%)	27 (51.9%)	10 (20.8%)	1 (20.0%)	0 (0.0%)
lease rate cap	Voluntary lease rate caps won't solve the problem	20 (14.8%)	10 (19.2%)	19 (36.5%)	17 (35.4%)	1 (20.0%)	0 (0.0%)
сир	Marketplace should regulate lease rate	10 (7.4%)	7 (13.5%)	1 (1.9%)	0 (0.0%)	0 (0.0%)	0 (0.0%)
Factors affecting	Competition among vessel owners for additional quota	40 (29.6%)	23 (44.2%)	26 (50.0%)	11 (22.9%)	0 (0.0%)	0 (0.0%)
	Marginal gains from leased quota	12 (8.9%)	10 (19.2%)	9 (17.3%)	3 (6.3%)	0 (0.0%)	1 (10.0%)
lease prices	Rent seeking of quota shareholders	20 (14.8%)	14 (26.9%)	11 (21.2%)	5 (10.4%)	0 (0.0%)	0 (0.0%)
	Relationships play an important role in leasing decisions	12 (8.9%)	8 (15.4%)	2 (3.8%)	0 (0.0%)	0 (0.0%)	0 (0.0%)
Leasing	Has heard that some owners lease crab they own wholly back to the boat	19 (14.1%)	8 (15.4%)	15 (28.8%)	21 (43.8%)	0 (0.0%)	1 (10.0%)
practices	Owner pays crew straight up on some quota	30 (22.2%)	17 (32.7%)	21 (40.4%)	20 (41.7%)	0 (0.0%)	0 (0.0%)
	Newer crew less likely to see lease rates as a problem	4 (3.0%)	1 (1.9%)	3 (5.8%)	8 (16.7%)	0 (0.0%)	0 (0.0%)
Amount of leased crab	All quota fished is leased to the vessel	11 (8.1%)	7 (13.5%)	9 (17.3%)	3 (6.3%)	0 (0.0%)	0 (0.0%)
	More quota fished is leased to vessel than quota that is not leased	14 (10.4%)	9 (17.3%)	13 (25.0%)	7 (14.6%)	0 (0.0%)	0 (0.0%)
on the	Less quota fished is leased to vessel than quota that is not leased	6 (4.4%)	5 (9.6%)	5 (9.6%)	6 (12.5%)	0 (0.0%)	0 (0.0%)
vessel	No quota fished is leased to the vessel	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)

Table 28. – Mutually-exclusive fishery participant categories: Interviewee perceptions of leasing practices.

	N	Passive quota	Quota S shareholder and vessel owner	Quota Shareholder and owner/operator	Quota 8 shareholder and 8 skipper	Non-quota 55 shareholding 56 skipper	84 All crew	ഗ CDQ reps	Expert respondents
Knowledge of voluntary	Familiar with voluntary lease rate cap	22 (34.4%)	13 (46.4%)	15 (75.0%)	10 (50.0%)	6 (50.0%)	9 (18.8%)	3 (60.0%)	1 (10.0%)
lease rate cap	Not familiar with voluntary lease rate cap	6 (9.4%)	1 (3.6%)	1 (5.0%)	2 (10.0%)	3 (25.0%)	22 (45.8%)	0 (0.0%)	0 (0.0%)
	Full compliance with voluntary lease rate cap	18 (28.1%)	8 (28.6%)	8 (40.0%)	3 (15.0%)	1 (8.3%)	4 (8.3%)	2 (40.0%)	1 (10.0%)
Experience with	Majority in compliance with voluntary lease rate cap	4 (6.3%)	4 (14.3%)	3 (15.0%)	3 (15.0%)	1 (8.3%)	1 (2.1%)	0 (0.0%)	0 (0.0%)
voluntary lease rate	Less than full compliance with voluntary lease rate cap	5 (7.8%)	8 (28.6%)	10 (50.0%)	12 (60.0%)	5 (41.7%)	10 (20.8%)	1 (20.0%)	0 (0.0%)
cap	Voluntary lease rate caps won't solve the problem	2 (3.1%)	3 (10.7%)	6 (30.0%)	9 (45.0%)	4 (33.3%)	17 (35.4%)	1 (20.0%)	0 (0.0%)
	Marketplace should regulate lease rate	3 (4.7%)	6 (21.4%)	1 (5.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	1 (10.0%)
E4	Competition among vessel owners for additional quota	7 (10.9%)	7 (25.0%)	9 (45.0%)	4 (20.0%)	4 (33.3%)	10 (20.8%)	0 (0.0%)	0 (0.0%)
Factors affecting	Marginal gains from leased quota	1 (1.6%)	3 (10.7%)	6 (30.0%)	1 (5.0%)	2 (16.7%)	3 (6.3%)	0 (0.0%)	2 (20.0%)
lease prices	Rent seeking of quota shareholders	0 (0.0%)	3 (10.7%)	5 (25.0%)	2 (10.0%)	0 (0.0%)	1 (2.1%)	0 (0.0%)	0 (0.0%)
	Relationships play an important role in leasing decisions	4 (6.3%)	6 (21.4%)	2 (10.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)
Leasing	Has heard that some owners lease crab they own wholly back to the boat	4 (6.3%)	1 (3.6%)	4 (20.0%)	7 (35.0%)	4 (33.3%)	21 (43.8%)	0 (0.0%)	1 (10.0%)
practices	Owner pays crew straight up on some quota	4 (6.3%)	8 (28.6%)	7 (35.0%)	8 (40.0%)	6 (50.0%)	20 (41.7%)	0 (0.0%)	1 (10.0%)
	Newer crew less likely to see lease rates as a problem	2 (3.1%)	0 (0.0%)	0 (0.0%)	2 (10.0%)	1 (8.3%)	8 (16.7%)	0 (0.0%)	0 (0.0%)
	All quota fished is leased to the vessel	0 (0.0%)	3 (10.7%)	4 (20.0%)	4 (20.0%)	1 (8.3%)	3 (6.3%)	0 (0.0%)	0 (0.0%)
Amount of leased crab on the vessel	More quota fished is leased to vessel than quota that is not leased	0 (0.0%)	4 (14.3%)	5 (25.0%)	4 (20.0%)	4 (33.3%)	7 (14.6%)	0 (0.0%)	0 (0.0%)
	Less quota fished is leased to vessel than quota that is not leased	0 (0.0%)	2 (7.1%)	3 (15.0%)	1 (5.0%)	1 (8.3%)	6 (12.5%)	0 (0.0%)	0 (0.0%)
	No quota fished is leased to the vessel	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)

Results: Crewmembers

Due to the small number of crewmembers interviewed, relative to the overall population of crewmembers, this information should not be extrapolated to provide representative crewmember perspectives on access to quota shares, lease rates, and active participation from these interviews. Rather, we include the crewmember data collected in this study to highlight issues identified by the subset of crewmembers interviewed and as a means to suggest areas of further research.

Access to quota shares

Overall, the majority of interviewed crewmembers (n=30) indicated that they were not familiar with the ROFO program. Of the interviewed crewmembers, only one had signed up for notifications through the ROFO program. Some crewmember interviewees (n=5) indicated that the ADF&G would be the best avenue to increase awareness, and specifically that information on the ROFO program could be packaged with the crew license application. Others (n=5) suggested that NMFS could pass along the information, though interviewees did not provide details on how specifically that should be done. A similar number of crewmembers (n=4) suggested promoting the ROFO program using social media or trade publications. Additionally, a handful of crewmember interviewees (n=5) proposed encouraging skippers to give out information to crew about the ROFO program. An important result to note is that, overall, over half of the crew that participated in this study (n=27) reported that they perceived a general lack of information accessible to crew about how the quota share system works.

Crewmembers who were interviewed were asked about their interest in purchasing quota shares in general. Many crewmember interviewees noted high quota share prices (n = 35), lack of quota available for sale (n = 18), and a lack of an open market (n=9) as barriers they perceive to purchasing quota shares. In addition, three mentioned the complexity and stress of navigating the quota share purchases. Some crewmembers focused on the question of whether or not they wanted to make a long-term commitment to being in the crab fisheries or the fishing industry in general (n = 10). Another six crewmembers stated that they saw the purchase of quota shares as a commitment to continuing to fish crab. Overall, seven interviewed crewmembers conveyed that they felt like other investments made better financial sense to them. Of the crew interviewees that were considering or had recently considered a quota share purchase, some (n = 9) had not yet looked into financing options for quota share purchases.

Active participation

On the subject of whether the current requirements for CVO quota ownership are sufficient, half of the crew members interviewed for this study (n = 25) communicated that they perceived a need for an additional active participation requirement on quota share ownership in the fishery. In addition, 35.4% of interviewed crewmembers (n = 17) expressed that they believe that absentee quota share ownership in the fishery is a significant problem. Seven crew respondents stated a preference for a 'boots on deck' requirement. Five crew respondents proposed a rule disallowing initially allocated quota to be passed down through families to non-fishing family members. Very few crewmembers (n = 3) specifically stated that they would consider a vessel ownership requirement to be a beneficial step towards modifying existing active participation requirements.

Leasing

Approximately half of the crew interviewed for this study were not familiar with the voluntary lease rate cap (n = 22). Ten crewmembers conveyed that they perceive that 100% compliance with the voluntary caps is not achievable. Overall, 17 crewmembers stated that they do not believe the voluntary lease rate caps will successfully address their concerns about leasing.

A total of twenty crewmembers reported that they were most recently on a vessel on which at least some portion of the quota was part of the original allocation to the vessel and was not charged to the crew. Twenty-one interviewees also shared perceptions about vessel owners in the fleet leasing wholly owned and/or initially allocated quota (as opposed to recently purchased quota) back to the vessel were also common among crewmembers. Overall, when asked to describe what percentage of fished quota was leased in, versus not leased in on their fishing vessel, a handful of crewmembers (n = 10) reported that on the vessel on which they work most crab that is landed has lease payments that are deducted.

DISCUSSION

Access to quota shares

The results of this study suggest that in spring and summer 2014, most skippers were familiar with the ROFO program. With crewmembers and skippers being the intended beneficiaries of the ROFO program, its success depends to some extent on them being aware of the program and ultimately using it to purchase quota shares. Towards the end of the data collection timeframe, the industry groups involved in the creation and operation of ROFO increased advertising efforts in trade publications and local industry media outlets. Additionally, they sent direct mailings of ROFO information to all active vessels. This will likely have helped promote the program; however, both skippers and crewmembers interviewed in this study suggested outreach through ADF&G and NMFS as another avenue for increasing awareness. Quota share holding skippers were the group of interviewees most likely to have already signed up for ROFO, which may indicate that skippers that are interested in purchasing quota shares have already taken steps to do so. Although relatively few of those interviewed had personal experience with the ROFO program, feedback from those that had already participated in the ROFO program in some capacity was mostly positive. Those that had acted on their ROFO eligibility found the process of buying quota shares straightforward and those buying or selling quota that went through ROFO reported that it did not negatively affect the process. In contrast, there are other interviewees that have not taken the step to sign up for the ROFO program because they perceive that quota share prices are too high or that navigating the financing and purchase of quota shares, and administrative burden associated with quota share ownership is too stressful relative to the potential benefits they associate with ownership. Irrespective of these perceptions, there were some differences in opinion between participant groups as to whether they perceived the ROFO program to be a good solution to addressing access to quota shares.

In the interviews, perceptions about the factors influencing access to quota shares related to the incentives, barriers, considerations, and financing for quota share purchases. The ROFO program is intended to create a 'market' for eligible skippers and crew to pursue quota share purchases. However, the ROFO program is not intended to directly address the quota share price

component. Quota share price as a barrier to purchase was a theme emphasized by interviewees across all fishery participant categories. Many interviewees that have made or have considered making quota share purchases in the past conveyed that, with current quota share prices, lease rates, and anticipated financing costs, buyers are faced with an estimated 10 year timeframe to pay off the investment.

The interviews elicited contrasting perspectives on whether most crewmembers are candidates for investment in the fisheries through the purchase of quota shares. Several interviewees in the non-crew participant categories conveyed that they perceive a crewmember's access to credit as a barrier for them to purchase quota. If true, this may be especially problematic for a crewmember seeking financing for a quota share purchase. However, when crewmembers were asked about the barriers they perceive to purchasing quota shares, they most commonly noted high quota share prices and that they see a lack of market access. This difference in opinions may reflect a variety of things; either many non-crew interviewees have misperceptions about the financial character of crewmembers, crewmembers do not self-assess their own credit worthiness, or that crewmembers perceive the quota price and lack of an accessible market as such absolute barriers that they rarely get to the step of assessing their credit worthiness.

Many of the respondents conveyed perceptions about the availability of quota, and how much quota is trading hands at this point in the program's tenure. In the recent economic climate, it appears many quota owners prefer to hold their asset and lease it, rather than selling it outright (even for those who may have already sold their qualifying vessel). This suggests that quota owners regard QS holdings as superior to alternative investments and/or anticipate a tax penalty or other transaction cost from selling the asset exceeds the costs associated with holding it and receiving a stream of lease revenues. Interviewees expressed that active participation requirements would likely induce some proportion of these individuals to sell their quota, thus, increasing the availability of quota on the market and potentially causing prices to adjust downward. Additionally, interviewees across the range of participant types brought up the influence of differences in market power of participants and willingness to pay in the quota share market, influencing the availability of shares.

These perceptions of the quota share market coalesce for crewmembers interviewed for this study that expressed deeper personal considerations, such as the life and career they want for themselves. Many crew respondents indicated that they were not sure whether they wanted to continue to work on deck for the next 10 years to pay off a quota share investment. Respondents communicated that purchasing quota shares would be a commitment to the crab fisheries. This uncertainty is likely why many of the crewmembers interviewed stated that they had not looked into financing options available to them for a quota share purchase. Given these perceptions, industry efforts to improve access to the CVO marketplace may not ultimately result in many crewmember purchases of quota shares for both financial and personal reasons.

As should be noted in context, it is well established in the scientific literature (Asche, Bjorndal, and Gordon 2009; Coglan and Pascoe 1999) that, in the presence of resource rents produced by a fishery, the expected outcome of a competitive market for IFQ is that payments to factor inputs (i.e., labor and physical capital) will ultimately be driven to equilibrium levels determined by external markets, and resource rents will accrue primarily to the quota pool. Barring some intervention in the market by regulators or effective voluntary measures, such as limiting lease payment for IFQ or subsidizing quota share purchases, it is likely that the asset

value of crab quota share will remain high for the foreseeable future and sales will be limited and episodic.

Active participation

Discussion of access to quota shares frequently related back to discussions about active participation in the crab fisheries. A few of the passive quota shareholders that were interviewed expressed that they purchased quota as an investment or had them bequeathed, with the intention of leasing it out and collecting royalties indefinitely. Other passive quota shareholders had been issued quota initially based on their historical participation and are now retired from the fisheries and lease out their quota. This difference in how a person obtained quota shares is likely why the passive quota shareholders interviewed were split as to whether they believed that the fishery needs an active participation requirement on CVO shares. Potential correlation between these two factors could be tested in further analyses. Previous NPFMC discussions on active participation focused on the latter group with the understanding that if any active participation requirements were implemented, initial allocation recipients would be grandfathered in. The impact on initial allocation recipients was one of the central points of opposition raised by interviewees that indicated quota share ownership in the fisheries should not have an active participation requirement.

The majority of interviewees in participant categories that involve physical presence on a vessel (i.e., crewmembers, skippers, owner/operators) relayed that they believe the fisheries need an active participation requirement on CVO shares. The underlying reason many respondents communicated was that under the current leasing structure, they believed most passive quota shareholders do not share in the financial risk of fishing. While the price negotiation process for agreeing on a lease rate should theoretically reflect risk sharing between the parties, this sentiment was expressed in a considerable number of interviews. Respondents' perception of inequity in these leasing arrangements related to the common practice of quota shareholders being paid a fixed share of the gross ex-vessel revenue produced from crab landed on leased quota, while vessel owner, skipper, and crew are paid a share of ex-vessel revenue, net of fuel, quota, and other operating costs. This difference is especially pronounced when expenses spike, such as during a year with higher than average ice coverage on the fishing grounds, and the financial burden is borne by the individuals fishing the quota. However, the opposite is true when expenses plummet, such as with the recent large decrease in fuel prices. The distribution of expenses is ultimately a business decision made within the context of each leasing relationship; vessel owners should incorporate perceived risk into the expected financial returns calculations used to determine an agreeable quota lease rate. However, this necessitates that leasing value is responsive to expenses on a similar timeframe and that passive quota shareholders and vessel owners have equal bargaining power. Based on the results of the interviews, it appears that these market conditions are not prevalent.

Leasing

Perspectives on leasing comprised the third central component of the interviews. The nature of this study does not allow us to evaluate the accuracy of information conveyed by interviewees or their interpretation of management objectives and their impact on conditions in quota markets or elsewhere in the fishery. With that caveat, the results of this study indicate that

across participant categories, there are common perceptions that the voluntary lease rate cap measure is not being followed by everyone. It is unclear whether respondents clearly understood the objective of the voluntary measure, described by one cooperative representative as the following:

"In response to Council concerns regarding the potential effect of high lease rates on crew compensation and vessel operations, ICE has asked its members to voluntarily cap their lease rate asks and offers to 65% for BBRKC and 50% for BSS. ICE intends to have the benchmark lease rates guide negotiations among members, but because the caps are voluntary, ICE anticipates some variation around those rates." (Sullivan 2015)

While respondents may have expectations regarding the lease rate cap that are contrary to this objective, the lease rate caps are functioning in the manner intended. The lease rates caps purposefully allow for free riders and likely the interviewees' focus on these outliers drives their perceptions of the overall effectiveness of the lease rate cap. For a voluntary mechanism such as this to be effective, incentives must be sufficient to motivate individuals to conform to the limits, and the incentive relied upon in this setting appears to be limited to social pressure within the cooperatives that have promoted the voluntary measures. Some interviewees feel that more social pressure is needed. This would help overcome economic incentives offered by the lease market. Furthermore, several respondents in these groups expressed skepticism that a voluntary lease rate could be an effective measure to address their concerns about the lease rates over the long-term. Vessel owners who hold quota shares commonly conveyed their assertion that lease rates self-regulate through the marketplace, while some interviewees referred to individuals or entities in the leasing market that have a different incentive structure related to the rates at which they make leasing decisions.

The ability of certain participants to offer higher lease rates may create an expectation for some quota shareholders as to the value that they could obtain for their leased quota, but there is no empirical evidence to support analysis of whether this has had a significant effect on the overall market. The cooperatives' voluntary lease rate caps are still relatively new, having been implemented for less than two years, as of early 2015. Self-reported data on lease rates were collected for the first time in the 2013 and 2014 EDR (for fishing years 2012 and 2013) and are currently being collected again in the 2015 EDR; therefore, limited data are available to track lease rates over time. While long-term effects on the quota market cannot be assessed, median lease rates indicated by empirical data, reported by active crab vessels to NMFS for 2013 and 2014 in mandatory Economic Data Reports, show an average of 64% to 66% for Bristol Bay red king crab and 46% to 54% for Bering Sea opilio crab across all harvest quota types, and 64% and 46%, respectively, for CVO A type IFQ (Garber-Yonts and Lee 2014). In addition, the cooperatives have also reported that their members are mostly in line with the lease rate caps (Crab Cooperatives 2013).

Irrespective of some interviewees concern with free riders and less than 100% compliance, the voluntary lease rate caps appear to be functioning as the cooperatives intended (Sullivan 2015). However, it does highlight an area of industry perception that could be targeted for outreach efforts if the cooperatives would like to affect more lease rate agreements and prevent voluntary participation from eroding over time.

CONCLUSION

The NPMFC's 5-year review of the BSAI Crab Rationalization Program identified a variety of issues that it felt should be addressed, including access to quota shares, active participation, and lease rates. A diverse group of participants in the BSAI crab fisheries, including 220 individuals across 8 categories of participants, generously shared their perspectives on these issues. Industry efforts to cooperatively address these issues through selfregulation are still nascent. The aggregated perspectives presented here are intended to broaden the feedback available to the cooperatives and the NPFMC as the measures are refined over the coming years. Effort was made to avoid any source of systematic bias and ensure the findings of the study are widely representative of perceptions among the respective participant groups. The results of the study represent a summary of perceptions among the distinct populations regarding various features of the Crab Rationalization Program and voluntary measures put in place by the cooperatives. The study does not attempt to assess the validity or accuracy of survey respondents' subjective views, or the efficacy of the measures we discuss, and findings are limited to identifying the relative frequency with which common perceptions (or possibly misperceptions) occur. The reader is cautioned to observe this caveat in interpreting the findings of the study. This study was designed to carefully investigate the underlying influences and processes in the fisheries that affect the overall effectiveness of the voluntary measures and is intended to supplement and support information gathered through the NPFMC's standard public involvement process regarding how industry participants currently assess the voluntary measures. We hope the results will provide constructive feedback to the industry on their efforts to address access to quota shares, active participation, and lease rates in the BSAI crab fisheries.

For many interviewees, the topics of access to quota shares, leasing, and active participation fit into a larger conversation about the future of the fishery post-rationalization. Some interviewees discussed trends they see increasing in the future with regard to the 'graying of the fleet.' Additionally, many discussed large-scale changes in pathways to ownership and how that impacts future new entrants in the fishery. In the next phase of this project, these additional topics will explored to provide further insight into the effects of rationalization.

The results of this report are based on a preliminary analysis of the data and represent a summary of the perspectives of interviewees. Further interpretive insight will be yielded by applying a more formal model-based analysis of the data that will support statistical testing of analytical results.

ACKNOWLEDGMENTS

First and foremost, the authors would like to thank all of the participants in this study for giving of their time and energy to this effort; we are indebted to their willingness to participate and share their experience and perspectives with us. Second, the authors would like to thank the representatives of the BSAI crab cooperatives for their insight into the topics explored in this study and their comments on earlier drafts of this report. The authors would also like to thank Marysia Szymkowiak for her help in research design and data collection, Conor Maguire for his assistance with data collection and transcription of interviews, and Jean Lee for her help with data retrieval. Additionally, we thank Barbie Clabots and Joy Devin for assistance with transcription of interviews. The authors would like to thank Ron Felthoven, Brian Garber-Yonts, Dan Lew, and the Alaska Fisheries Science Center Publications Unit for their review of this

report. Funding for this research came from the Office of Science and Technology of the National Marine Fisheries Service, NOAA. The opinions expressed in this article are those of the authors and do not necessarily reflect those of the National Marine Fisheries Service.

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