



D1 BSAI Crab Partial Offload

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Action Memo

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Action Required:

1. Discussion paper – review
2. If further action is warranted, identify purpose and need statement and alternatives

Background

In April 2018, the Council received a proposal from the Pacific Northwest Crab Industry Advisory Committee (PNCIAC), requesting the Council consider removing a regulatory prohibition that bans vessels fishing for Bering Sea/Aleutian Island Crab Rationalization (CR) crab from conducting a partial offload of crab and then continuing to fish, prior to the offload of any remaining crab. In response to this testimony, the Council initiated the attached discussion paper in order to consider removing this regulation for the CR Program fisheries.

While not expected to become standard procedure in the fisheries, PNCIAC noted this flexibility to conduct partial offloads of crab could benefit them in emergency situations or special circumstances related to the safety or economics of the operations. NOAA Office of Law Enforcement (OLE) has also noted occasional situations (about one each year) where this regulation has created an economic obstacle which OLE must enforce.

The primary concern from the proposed action has to do with ensuring proper accountability. While this prohibition was initially included in the CR Program to alleviate certain enforcement concerns that have since been shown to be unwarranted, the practice of offloading all crab before returning to fish has greatly simplified the monitoring and accounting associated with crab harvesting. The discussion paper highlights some ways accounting could be skewed or complicated from partial offloads. For instance, in a delivery that occurs after a second round of fishing, when crab from the first round is retained onboard, we may not be able to identify which crab was harvested from where and the characteristics that are associated with that fishing effort (e.g. catch per unit effort).

This proposed action also has potential distributional effects on processors and communities; however, under the expected scope of the action, the marginal impacts from this action are expected to be limited. The discussion paper includes consideration of changes in distribution of landings, deadloss, and the prevalence of live crab markets.