



December 7, 2023

Ms. Angel Drobnica, Chair
North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, AK 99501

RE: Comment on Agenda Item C1 (C-shares)

Dear Chair Drobnica and Council Members:

The Alaska Bering Sea Crabbers (ABSC) is a trade association representing the majority of independent crab harvesters, including the majority of c-share holders, who commercially fish for king, snow (opilio), and Tanner (bairdi) crab with pot gear in the Bering Sea and Aleutian Islands (BSAI) Crab Rationalization Program. We appreciate the opportunity to comment on Agenda Item C1 – Crab C-share recent participation requirement – final action.

ABSC appreciates the analysis and staff work on what turned out to be a complex fix to what seemed like a straightforward issue – how to protect and keep active participation in the fishery during a time of low crab abundance or closed fisheries.

ABSC supports Alternative 2 which maintains active participation requirements for c-share holders in the BSAI Crab Rationalization Program while building in some flexibility in times of low quota or closed fisheries like we are experiencing in recent years. Within Alternative 2, ABSC supports Options 1, 2 (suboption 1 at 25 MIb), and 3. ABSC requests Option 3 allow tendering in Alaska to count toward the '30 days of fishing' active participation requirement.

Within Alternative 2, Option 1 restarts the clock and reissues revoked quota, improving fairness for those that could not make a fishing trip in recent years due to COVID or low quotas with few boats fishing. We encourage the Council to take final action and encourage NMFS to implement as soon as possible to reduce harm to c-share holders. In addition, we strongly recommend the agency reissue any revoked quota as soon as possible.

Alternative 2, Option 2, Sub-option 1 sets a threshold at 25 MIb combined TAC for Bristol Bay red king crab, snow crab, and Bering Sea Tanner crab, below which active participation is suspended. 25MIb was selected as the threshold because these combined fisheries have never been below that TAC in the history of the crab fishery until the 21/22 season.

ABSC did not take a position on the methods to implement Alternative 2, Option 2 listed in the Council's addendum under this agenda item.

Alternative 2, Option 3 levels the playing field for non-initial issues to be able to have the same flexibility and requirements to maintain c-shares as initial issues. In other words, both can maintain active participation within a three-year period by either participating in a BSAI crab trip or by fishing in either a federal or state commercial fishery off Alaska for 30 days.

ABSC requests that tendering should count towards the '30-days of fishing' requirement. A large percentage of the tender vessels are in fact Bering Sea crab vessels with their crab crews all trying to survive in these years of low crab harvest or closed fisheries. Many crab crew also work on tender vessels outside of crab seasons. In fact, many crab crew often tender first before crabbing, with tendering acting as an on-ramp for new crab crew. Working on a tender vessel at sea in Alaska is similar work and should be considered on par with participating as a crew on a fishing trip.

Crab fishermen need flexibility moving forward during times of low quotas and harvest levels or closed fisheries. C-shares are an on-ramp for new entrants, which catch share programs work to encourage. We need incentives for new entrants and to keep active crab fishermen engaged and wanting to invest in Bering Sea crab fisheries. We need to protect our c-share holders as our "boots on deck" fishermen. Moving forward, there may be additional ways to protect our active fishermen, like providing more flexibility in the restrictions around eligibility to buy/receive c-shares. Those could be explored during the next Crab Rationalization Program review process.

In closing, Alternative 2 as stated in ABSC's position above strikes the balance between creating some flexibility in the system to address some of the challenges of the rationalization program during times of low quota while also maintaining the active participation requirements for c-share holders.

Thank you for considering our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Goen', with a stylized flourish at the end.

Jamie Goen
Executive Director
Alaska Bering Sea Crabbers