



November 28, 2025

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

RE: Comment on C1 – Crab Arbitration Final Action

Dear Chair Drobnica and Council Members:

The Alaska Bering Sea Crabbers (ABSC) is a trade association representing the majority of independent crab harvesters 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 C1 – Crab Arbitration Final Action and we align our comments with those submitted by the Inter Cooperative Exchange (ICE).

We appreciate the work by the authors to pull together the analysis presented in this document. Primarily, ABSC understands that Harvesters, Processors and Communities may all be able to agree that proposed revisions to the BSAI Crab Arbitration Program could shift and streamline certain costs and burdens, specifically, by reducing redundant reporting and eliminating the annual Market Report. The Council document identifies this as an unnecessary regulatory requirement and supports removing them without compromising overall management effectiveness. More generally, while the binding arbitration system continues to be a source of dispute between BSAI crab harvesters and processors, the Arbitration System has worked effectively for many years, with minimal arbitrations. As is recognized in the document, changes to IFQ/IPQ withdrawal rules may increase uncertainty and, in extreme cases, constrain quota issuance and reduce national net benefits. The Council's qualitative net-benefit assessment underscores the importance of balancing efficiency, transparency, and predictable economic outcomes for all participants. We urge the Council to avoid making substantive changes that cause the Crab Rationalization Program to deviate from its founding intent of ensuring the maintenance of the historical division of revenues between harvesters and processors.

Lastly, for further details and considerations for Council final action, please refer to the comment letter submitted by ICE.

Sincerely,

Gabriel Prout  
President  
Alaska Bering Sea Crabbers