



November 28, 2025

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

RE: Comment on C2 – Crab C-Shares Final Action

Dear Chair Drobica 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 staff's thorough work on the crew quota shares (C-shares) analysis and the Council's commitment to ensuring this program continues to serve active fishermen.

Crab harvesters have faced immense challenges in recent years, with closed fisheries, low TACs, and reduced opportunities for crew. This action provides meaningful solutions to these challenges.

ABSC supports Alternative 2 to increase flexibility in the eligibility requirements for C-shares and Alternative 3 to increase the use caps to 5%. Expanding eligibility to include tendering experience and extending the participation window from one year to three years are practical adjustments that address challenges in low TAC years with few vessels and opportunities to participate in crab fisheries. It will allow more working fishermen to be eligible buyers. Likewise, increasing C-share use caps to 5% should encourage investment and entry into the fisheries.

Together, these changes will increase opportunity, increase flexibility, and ensure C-shares remain a pathway for active crew and new entrants into the BSAI crab fisheries.

Thank you for the opportunity to comment.

Sincerely,

Gabriel Prout
President
Alaska Bering Sea Crabbers