



June 2, 2023

Mr. Simon Kinneen, Chairman
North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, AK 99501

RE: Comment on Agenda Item C3 (C-shares)

Dear Chairman Kinneen 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 Agenda Item C3 – Crab C-share recent participation requirement – Initial review.

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

ABSC supports Alternative 2 with options 1 and 2 and encourages the Council to select those as their preliminary preferred alternative. We encourage the Council to move this action on to final action as soon as possible to reduce harm to c-share holders that may get their quota revoked in 2023. In addition, we strongly recommend the agency reissue any revoked quota and make a statement of their intent to do so.

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. Those could be explored during the next Crab Rationalization Program review process.

We understand that NOAA Fisheries made public announcements and created a website about c-share participation requirements to provide notice to participants. However, we request that if NOAA Fisheries has not already done so, that they also send personalized notice to individuals at their address of record and make reasonable attempts to contact the individual in advance of that person’s c-shares being subject to revocation to give them an opportunity to come into compliance over the next season. Not everyone reads websites and newsletters and they might not think it applies to them personally.

Another complicating factor is that if c-share holders are forced to sell their c-share quota in order to avoid revocation, it may impact the quota market for all remaining quota holders in BSAI crab fisheries by devaluing the commodity. In this scenario, not only are crew and new entrants disproportionately harmed by being forced out of a fishery during a crisis, but the entire quota market for all of those remaining could be further negatively affected. To address this, we ask that NOAA Fisheries publicly announce that they

do not intend to revoke c-share quota until a permanent solution has been implemented to prevent a forced sale of quota share during a fishery disaster.

ABSC urges the Council and NOAA Fisheries to create policies and regulations that protect our active fishermen and new entrants in the Crab Rationalization Program during times of low or closed BSAI crab fisheries or other unforeseen challenging circumstances, like the pandemic.

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
jamie@alaskacrabbers.org