



May 30, 2025

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

RE: Comment on C3 – Pelagic Trawl Gear

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 are concerned with the overall health of Alaska's crab stocks, and the potential impacts mobile bottom contact gears could be having on vulnerable crab on the seafloor and on their habitat. To that end, we appreciate the opportunity to comment on agenda item C3 – Pelagic Trawl (PTR) Gear Definition and Innovation.

We urge the North Pacific Fishery Management Council (Council) to take three meaningful steps to define pelagic trawl gear that 1) allows opportunity for innovation, 2) align the regulatory language defining PTR with other regions' (e.g., AK state waters, West Coast) "off-bottom" language to reflect the specific intended gear behavior with enforceable performance standards and, 3) to provide the necessary management incentives to achieve the goals and objectives outlined in the Council motions.

In February 2024, the Council tasked staff to prepare two separate discussion papers – one, *an environmental assessment/regulatory impact review for proposed regulatory amendment to modify pelagic trawl definition* and two, *a pelagic trawl gear innovation discussion paper*. We recognize that the Council intentionally separated these two issues as they came out of a Bristol Bay red king crab protection agenda item and specifically intended the pelagic trawl gear definition piece to be housekeeping. Our understanding was that the Council wished to clean up the definition in a way to align regulation with current fishing practices while also allowing added flexibility for future gear innovation. Once these two steps were completed, the Council signaled their intent to facilitate the development of enforceable performance standards for PTR. The two issues before us at this Council meeting, are, however, intrinsically intertwined and our comments will reflect as much and will have overlap between definition and innovation, similar to the way the content of the two documents are related and overlap.

We appreciate much of the ongoing work by the pelagic trawl industry to begin researching different innovative ideas to help understand PTR fishing behavior and reduce the impacts to crab and habitat on the seafloor. We are generally supportive of clarifying the gear definition to allow use of salmon excluders, cameras or other technologies to reduce bycatch, seafloor contact

or conduct research. We hope the Council will take the necessary steps at this Council meeting to define pelagic trawl gear so that it may allow opportunity for further innovation, and we would also continue to ask that the codend be included in the pelagic trawl gear definition. We are concerned that removing the codend from the applicable definition of pelagic trawl gear could open the door for other unforeseen and unintended consequences in the future. In particular, if future innovations or gear modifications to the codend changed the way the gear performed and there was a significant increase of bottom contact by the codend, this could result in unintended mortality for crab species and negative impacts on habitat. If the intent of the Council is to allow for flotation and metal components to be configured with the codend, then let's work to define that appropriately within 50 CFR 679.2.

While the Council takes up this action to consider clarifying the definition of PTR gear, we once again ask that the Council also take the opportunity to clearly define pelagic trawl fishing and the intended performance of the trawl and associated gear. If the Council chose to align this definition with other regions that detail the "off-bottom" aspect of being pelagic, that alone could address the incentive component of the purpose and need statement in the gear definition action. If the intended function of pelagic trawl gear is to operate near the seafloor, potentially with seafloor contact, then a new gear definition, category, or name that reflects that behavior would be appropriate. This redefinition must be accompanied by a clear framework that includes enforceable performance standards and meaningful incentives for continued innovation that reduces seafloor impact and unobserved mortality. The discussion paper touched on some of the technology logistics and limitations but fell short of exploring other ideas and solutions.

Lastly, we would like to see the Council, through management measures, provide the necessary incentive for sustainable PTR fishing practices that reduce or eliminate habitat disturbance and impacts to crab stocks. The Purpose and Need statement from the gear definition paper states that *"clarifying the definition of PTR gear will also facilitate the process to incentivize trawl gear innovation or other measures to minimize the impacts of PTR on bycatch, sensitive habitat and unobserved mortality"*. Furthermore, the introduction of the PTR gear innovation paper began by providing the February 2024 Council motion, which reads, in part *"the Council tasked staff to prepare a discussion paper to inform options for incentivizing pelagic trawl gear innovation with the following objectives:*

- *Minimizing bycatch to the extent practicable*
- *Minimizing the impacts of pelagic trawl gear on sensitive benthic habitat and unobserved mortality of stocks that rely on such habitat*

*The Council will review options for changes to the performance standard following this work"*. Ultimately, the Council has acknowledged that Alaska's crab stocks are at a level of conservation concern and the unobserved fishing mortality working group highlighted the high degree to which PTR could be having negative impacts on crab and their associated benthic habitat. So much so that the Council set this as one of their top research priorities. We urge the Council to take appropriate action by creating a stronger incentive for pelagic gears to avoid contacting the seafloor or avoid critical areas when crab are molting and aggregated for mating.

To summarize, we encourage industry innovation to minimize bycatch and reduce, or even eliminate, potential for unobserved fishing mortality on crab stocks. We ask the Council to take meaningful steps to define pelagic trawl gear that allows opportunity for innovation, define pelagic trawl fishing to align with the midwater descriptions of other regions and, lastly, to provide the necessary management incentives to achieve the goals and objectives outlined in the Council motion. Thank you for considering our comments and recommendations for further steps to provide additional protections for crab while also allowing all sectors to harvest their respective resources in a sustainable way, true to the great reputation of Alaska seafood.

Sincerely,

A handwritten signature in black ink, appearing to read "Gabriel Prout". The signature is fluid and cursive, with a large initial "G" and "P".

Gabriel Prout

President

Alaska Bering Sea Crabbers