



September 26, 2025

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

Re: Comment on Agenda Item C3 Crab Specifications

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 provide comments and insight on behalf of crab harvesters, and we also support the comments submitted by the Bering Sea Fisheries Research Foundation (BSFRF).

First and foremost, we thank the Crab Plan Team (CPT), assessment authors, department and agency staff for their continued diligence in compiling and analyzing the most recent data and providing management advice for Bering Sea crab stocks. The crab industry continues to view this process as a critical planning period for both the current and future seasons, and we particularly appreciate the multiple opportunities provided to allow our industry participants air time to provide direct feedback at public meetings and Q&A sessions that have been integrated into the data sharing process. Similarly, we would like to acknowledge all the efforts to produce the summer survey tech memo in a timely manner that allows for sharing preliminary results with industry early, prior to CPT and Council meetings, which greatly supports operational planning leading into the fall fisheries.

We are encouraged by the positive signals emerging from the most recent survey results, particularly for the *Chionoecetes* species, and note with interest the significant changes observed in snow-bairdi hybrid abundance. These trends underscore both the complexity of stock assessments and the need for continued dialogue between scientists, managers, and industry. While we recognize this complexity and the time and resource requirements to complete annual crab stock assessments, we would like to take this opportunity to reiterate some of ABSC's previous asks of the Council, SSC and CPT - to dedicate more meeting time to current pressing issues, in this case, how to best manage such a large biomass of hybrid crabs. The CPT meeting is a perfect opportunity to have an important timely discussion with so many crab experts present.

With regards to snow crab, we support the comments provided by BSFRF and also appreciate Dr. Szuwalski's continued efforts to provide guidance on the status of the opilio stock and management advice during this period of apparent recovery, and we concur with the CPT and SSC that further investigation into the most appropriate currency of management and index of male snow crab maturity is warranted. However, we remain concerned that model-based outcomes continue to diverge from survey indicators, which reflect ongoing signs of stock recovery, including increases in large and preferred-size males, and juvenile abundance above the 10-year average, despite continued low levels of industry preferred males. We also understand that an increase of a small number still results in a small number, but this positive signal of recovery is a step in the right direction. The proposed change in maturity classification is not yet

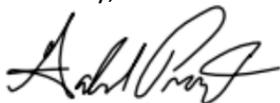
supported by information specific to Bering Sea mating dynamics nor is it representative of the larger biomass of mature males greater than 3.1". While further exploration is warranted for the assessment purposes, the current model and the resulting low OFL estimates may not accurately represent the current status of this stock. This divergence, compounded by uncertainties associated with recruitment variability, the missing 2020 survey, and continued convergence challenges, makes it difficult for industry stakeholders to reconcile assessment results with observed trends. We respectfully urge the SSC to consider these discrepancies carefully when deliberating on management advice, avoid constraining TAC decisions based on uncertain or incomplete information, and prioritize the development of a management strategy evaluation to examine the implications of management currency and the role of large males in opilio stock dynamics.

Next, we'd like to turn to hybrids. We draw attention to hybrids, not surprisingly, due to the dramatic increase in abundance recently observed in the 2025 NMFS summer trawl survey, an increase to levels we have not seen anything like before, not even close. Historically, our fishery landings of hybrids comprise an average of roughly 1–2% of total snow crab landings. However, the surprisingly large portion of hybrid crab biomass in the most recent survey, estimated that 20% of all industry preferred *Chionoecetes* males (carapace width ≥ 101 mm) in the eastern Bering Sea were, in fact, hybrids. One in five ≥ 101 mm crab was a hybrid. Given this, there is a significant shift with potential implications for management. The growing presence of hybrids merits further investigation into how they may contribute to the broader commercial resource and how future management frameworks might account for them. This brings us to one of our opening points regarding dedicated CPT discussion regarding just this. We appreciate some of the anecdotal discussions that came out of the CPT, and the plan to further address this issue at the May meeting next year, however, this issue was flagged earlier in the summer and warranted designated air time at this September's meeting.

In summary, we appreciate the dedicated scientific work, assessment development, and deliberations that inform crab stock assessments and management advice from the CPT as a whole. We encourage the SSC and Council to consider the full weight of survey information, emerging research, and the uncertainties inherent in current models as you deliberate key decisions and future recommendations at this meeting. We urge the Council to encourage, or even direct the CPT to manage pressing issues, like this year's hybrid data, in a more timely manner. We understand there needs to be a balance between all aspects of crab management and capacity at these meetings is an issue, but a proactive approach is something ABSC has been requesting for some time now. Overall, we are grateful for the continued collaboration among scientists, managers, and industry, as this remains essential to ensure that management measures reflect the best available science and support both stock sustainability and fishery viability.

Thank you for considering our comments

Sincerely,



Gabriel Prout
President

Alaska Bering Sea Crabbers