



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 C6 – Economic Data Report Removal

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 comment under this agenda item. While our comments are reflective of the crab rationalization program, we also support removal of the EDRs across all sectors.

For the crab fisheries, the Economic Data Report (EDR) program has created significant and ongoing administrative costs and reporting burdens without delivering commensurate value. The original intent was to provide meaningful economic insight to inform management, but in practice, these data have been underutilized, difficult to interpret, and often not incorporated into analyses in a way that justifies the reporting burden. The time and expense required to comply with these reporting requirements fall directly on harvesters, processors, and other participants in the crab fishery, compounding the already high cost of doing business in this fishery.

By removing the EDR requirements, the Council can reduce unnecessary costs, lower cost recovery fees, and allow industry participants to focus resources on fishing operations, bycatch reduction, and sustainable management priorities. This action would streamline regulatory requirements and better align with the intent of Restoring American Seafood Competitiveness (Executive Order 14276) to eliminate duplicative or unproductive reporting mandates.

We respectfully urge the Council to move forward with final action on Alternative 2 at this meeting. For the crab industry, this will provide meaningful relief while maintaining the Council's ability to manage our fisheries sustainably and responsibly.

Thank you for the opportunity to comment.

Sincerely,

Gabriel Prout
President
Alaska Bering Sea Crabbers