



November 29, 2024

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

RE: Comment on Agenda Item D3 BSAI Crab C-shares

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 staff's hard work on this document and the opportunity to comment on agenda item D3 BSAI Crab C-shares – Discussion paper.

ABSC appreciates the efforts of the authors to put together this initial discussion paper following the Council's action under the BSAI Crab Rationalization Program Review agenda item in June earlier this year. Crab dependent communities, stakeholders, and harvesters, have been heavily impacted in recent years following multiple consecutive crab fishery closures and low TAC years, while also having felt the impacts of the COVID-19 pandemic. We appreciate the Council bringing forward this analysis to consider modifications to eligibility requirements and increased use caps for crew quota shares (or C shares) in the BSAI Crab Rationalization Program (CR Program). Given the afore mentioned challenges the Bering Sea crab fisheries are facing, the exploration of the measures proposed within this paper are two methods in which active participation challenges may be addressed and could encourage new entrants into the fisheries and help promote economic stability and resiliency for participants. We urge the Council to consider further analysis of alternatives under both low and high abundance periods.

Increasing use caps would provide more opportunities for current C share quota share (QS) holders looking to purchase additional C shares. It could also incentivize additional entrants into the respective CR Program fisheries. Potential buyers whose operations would not be profitable under the constraints of current individual use caps may decide to enter into the fishery and purchase C share QS via transfer if individual use caps were increased to a QS volume in which they would be profitable. We encourage the Council to explore a range of alternatives related to increasing C share use caps for each fishery, particularly using the information provided in Table 5-2 and Figure 5-1 of the document, as a reference point as to which fisheries have individual use caps that may be constraining participants that would be interested in further investment. In choosing alternative use caps, we encourage the Council to look at striking a balance that encourages new entrants and investment in the fishery while also not allowing too much control by any one entity nor too much consolidation.

Additionally, we encourage the Council to further explore increasing flexibility in the eligibility requirements for buying C shares to better align with recent changes to maintain C shares and include tender vessels as active participation. Many crab fishing vessels and fishermen also tender for other fisheries throughout the state and allowing time tendering to count towards eligibility further supports

CR Program fisheries. Further, we encourage alternatives to follow current policies that tie eligibility to purchase C shares with participating in the CR Program, recognizing the current 365 day requirement is too restrictive in years with closed fisheries, low quotas, and significantly fewer vessels fishing.

In summary, we are supportive of changes to C share requirements that would encourage new entrants in the CR Program by increasing flexibility in both the eligibility requirements for buying C shares to better align with recent challenges the industry has been facing and to maintain C shares by considering increased use caps. We feel that it's important for C shares in this program to remain focused on active fishermen in the BSAI crab fisheries, and want to encourage the Council to proceed with this action and analyze alternatives to improve this fishery for C share holders, in both low and high abundance periods, in a way that continues facilitating increased stability and resiliency in the CR program.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gabriel Prout', with a stylized, cursive script.

Gabriel Prout  
President

*Alaska Bering Sea Crabbers*