



**DI Discussion Paper:
Partial offloads in the BSAI Crab
Rationalization Program**

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Sarah Marrinan, NPFMC

PROPOSED FEDERAL REGULATORY AMENDMENT

- §680.7(b)(3) states a prohibition on “resum[ing] fishing for CR crab or tak[ing] CR crab on board a vessel once a landing has commenced and until all CR crab are landed, unless fishing in the Western Aleutian Islands golden king crab fishery”
- Currently allowed to conduct partial or “split” deliveries to multiple processors, BUT
- Cannot fish or haul gear in between



Offloading crab, Photo credit: M.Fina, 2008

BACKGROUND

- Regulations included during the development of BSAI crab rationalization
- The concern was that partially offloading crab during a trip would exacerbate the opportunity to discard crab illegally
- Unlikely to be the case, BUT
- Greatly simplifies accounting process
- Created an exception for the Western Aleutian Islands golden king crab fishery in 2016 (Council action in 2015) to help promote live market opportunities in Adak
- Small number of boats in this fishery- ADF&G would work with captains



PROPOSED FEDERAL REGULATORY AMENDMENT

- Request is to remove this regulations which could impact CR Program fisheries
- BSAI CR Program fisheries are jointly managed by the Feds and the State of Alaska
 - Require a Fed reg amendment,
 - No FMP amendment necessary
 - No State reg change necessary, BUT
 - It would change how the State manages the fisheries (protocol)

Crab Fishery TAC - 10% for CDQ & Adak = IFQ allocation

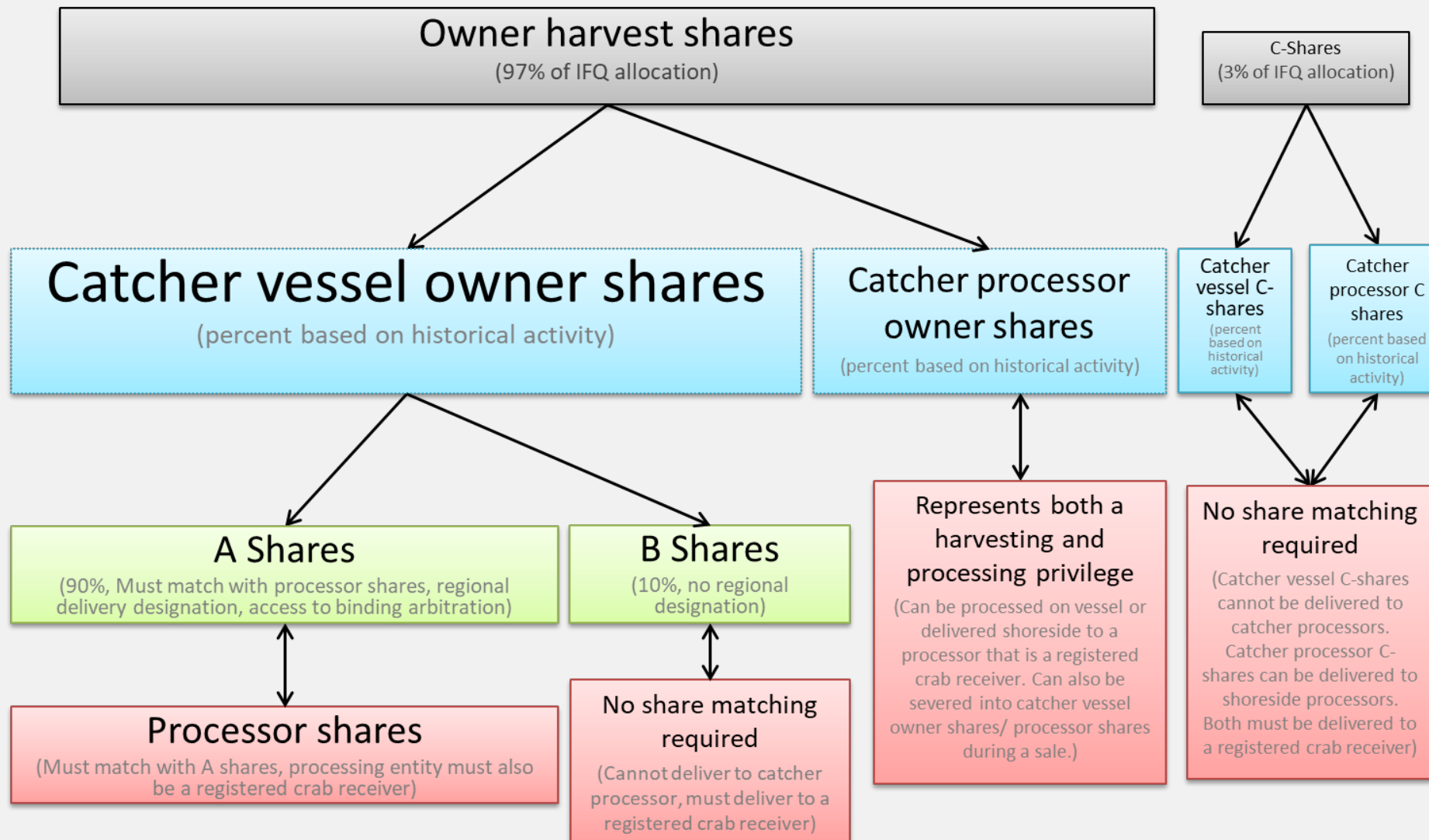


Figure 1, Page 4 in document

Crab Fishery TAC - 10% for CDQ & Adak = IFQ allocation

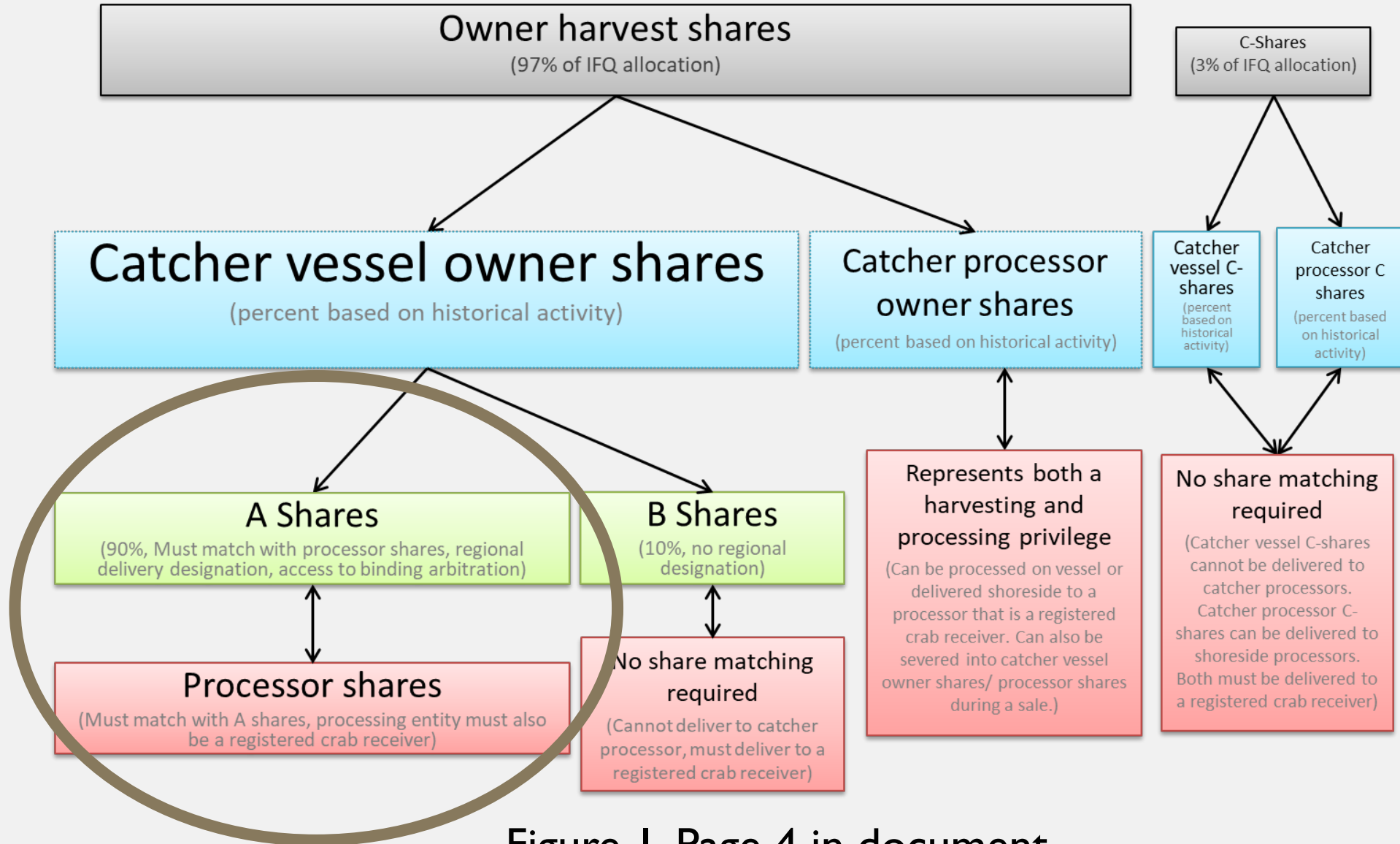


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REGIONAL DESIGNATIONS

Crab QS Fishery	North Region	South Region	West Region	Undesignated Region
EAG	X	X		
WAG			X	X
EBT				X
WBT				X
BSS	X	X		
BBR	X	X		
PIK	X			
SMB	X	X		
WAI		X		

Table 1, Page 4 in document

SCOPE OF CHANGE



Processing workers offloading *C. opilio* crab

- Harvesters expect a limited scope of impacts from this action
- Only expected to be used in special circumstances related to the safety or economics of the operations
- Primary motivation for *not* using this option:
 - 1) Risk of deadloss – both tanking up/ down to offload a partial tanks and due to increase time before offload
 - 2) Efficiency of full offload
- Limited use of this flexibly in the WAG fishery
- Primarily be used due to issues related to split north/ south deliveries

POTENTIAL IMPACTS ON HARVESTERS

- Overall positive, increased flexibility, not required to change their behavior
- Reasons for proposal cited by PNCIAC:
 - Emergency relief situations
 - In the event of the development of new market (live crab)
 - Situations where split deliveries are occurring between St. Paul and the southern region create inefficiencies
- Reasons for proposal cited by NOAA OLE:
 - Several anecdotes where this regulation has become problematic for harvesters
 - OLE must continue to enforce the prohibition even if the crab is accounted for through their IFQ



Vessels delivering to St. Paul, Photo credit: M.Fina, 2008

IMPACTS ON MONITORING AND ACCOUNTABILITY



Observer
Coverage



Reporting
Requirements



Sampling



Cost of
implementation

OBSERVER COVERAGE

Crab Area	Crab fishery	Observer coverage requirement
Registration Area O (Aleutian Islands)	red king crab (W of 179 W long)	During 100% of the harvest
	golden king crab (W of 174 W long)	During 50% of the total harvest for each of the 3 trimesters.
	golden king crab (E of 174 W long)	During 50% of the total harvest for each of the 3 trimesters.
Registration Area T (Bristol Bay)	red king crab	During harvest of 20% of the total red king crab weight harvested by each CV OR the department can randomly select 20% of the CV harvesting BBR to carry an observer for 100% of the time
Registration Area Q (Bering Sea)	Pribilof Islands red and blue king crab	During 100% of the harvest
	St. Matthew Island Section of the Northern district blue king crab	During 100% of the harvest
Registration Area J (Westward)	Bering Sea District C. opilio	During harvest of 30% of the total C. opilio weight harvested by each CV OR the department can randomly select 30% of the CV harvesting C. opilio to carry an observer for 100% of the time
	Bering Sea District C. bairdi	During harvest of 30% of the total C. bairdi weight harvested by each CV OR the department can randomly select 30% of the CV harvesting C. bairdi to carry an observer for 100% of the time

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RETAINED CATCH SAMPLING REQUIREMENTS

- Retained catch sampling (observer or dockside sampler)
 - Average weights (at each partial offload)
 - Size Frequency (only at one offload)
 - Deadloss Estimate (at each partial offload)
 - Legal Tally (if necessary – after size frequency conducted)

REPORTING REQUIREMENTS

COPY DISTRIBUTION:
 Revised: 5/11/2018 WHITE Vessel Copy: Keep in Logbook • GREEN IFQ Distribution • GOLDENROD Observer copy • BLUE Discard Report Submit to Processor • YELLOW NMFS Copy: Remit

OMB Control No. 0648-0213
 Expiration Date: 05/31/2021

CATCHER VESSEL DFL LONGLINE AND POT GEAR				VESSEL NAME	FEDERAL CRAB VESSEL PERMIT NO.	IFQC USE ONLY	PAGE
OPERATOR NAME AND SIGNATURE				ADF&G VESSEL NO.	FEDERAL FISHERIES PERMIT NO.		

IDENTIFICATION	INACTIVE	START	END	REASON	FEDERAL REPORTING AREA	CREW SIZE	GEAR TYPE (check one) <input type="checkbox"/> Pot is longline pot? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> Jig <input type="checkbox"/> Trawl <input type="checkbox"/> Handline <input type="checkbox"/> Hook & Line <input type="checkbox"/> Other If hook & line or longline pot, complete applicable boxes below.			
	IFQ		CDQ		OBSERVER INFORMATION		GEAR ID FIXED HOOK HOOK & LINE OR LONGLINE POT GEAR ID CDQ# TUB ANCHOR S SE Length of stave (feet/30m) or net (m/90') Stave hook or pot Spacing hook or pot No. hooks per stave			
	Operator IFQ Permit #		IFQ Permit #		CDQ Group #		NO. OF OBSERVERS ONBOARD		OBSERVER NAME & CRUISE #	
	IFQ Permit #		IFQ Permit #		Halibut CDQ Permit #		OBSERVER NAME & CRUISE #		OBSERVER NAME & CRUISE #	

MANAGEMENT PROGRAM CDQ Exempted Research AIP No. _____

SET #	DATE & TIME SET	DATE & TIME HAUL	Bury Bag #	LOCATION OF SET		BEGIN & END DEPTH (Fath.)	GEAR ID	NUMBER OF SKATES OR POTS		TARGET SPECIES CODE	CDQ/IFQ (Pounds)	IFQ SABL (Pounds) <small>WF Western cut SC Eastern cut</small>	CR CRAB	HAIL WEIGHT (lb. or mt.)	BIRD RINGS	Mammals (No.) <small>signed while hauling</small>	Number damaged
				BEGIN POSITION LATITUDE LONGITUDE	END POSITION LATITUDE LONGITUDE			Set	Lost								

DISCARD POSITION	DATE																
	SPECIES CODE																
	PRODUCT CODE																
	BALANCE FORWARD																
	DAILY TOTAL																
CUMULATIVE TOTAL SINCE LAST DELIVERY																	

COMMENTS:

DELIVERY	DATE	ADF&G FISH TICKET NO.	RECIPIENT'S NAME or IFQ REGISTERED BUYER	UNLOADING PORT	IFQC USE ONLY

- Observer’s duty; Dockside sampler backup
- Collect Daily Fishing Logbook (logbook)
- Conduct Confidential Interview Form (CIF) and CIF Summary
- ADF&G Fish Ticket

COSTS OF IMPLEMENTATION

Important to consider the costs that may accrue to the cost recovery program

➤ One-time costs:

Writing the regulations, proposed, and final rule

Identifying ADF&G protocol

Amending Fish Ticket form

➤ Ongoing costs:

Greater communication



Old shell versus new shell crab

MONITORING AND ACCOUNTABILITY: SUMMARY

- Changes to ADF&G and Observer Program protocol to deal with the complexity of a partial offload in the middle of a trip
- Increased communication between harvesters using this flexibility and ADF&G
- Likely unable to edit Fish Tickets after this type of trip which means compromising the quality of some of the data by statistical area

POTENTIAL IMPACTS ON PROCESSORS AND COMMUNITIES

- Given the expectation of magnitude of change and the structure of the CR Program, scope of impacts to processors and communities expected to be limited



Dutch Harbor/ Unalaska, 2019



POTENTIAL IMPACTS ON PROCESSORS AND COMMUNITIES

- Still required to have IFQ to harvest crab
- Crab quota holders are still required to share-match their A share IFQ with processor IPQ
- Regional designations for A share IFQ still applies
- Not so big of an action that I would expect a lot of changes on the QS or PQS market – expect this action wouldn't change who harvests or processes crab

POTENTIAL CHANGES THAT COULD IMPACT PROCESSORS AND COMMUNITIES



City of St. Paul, Photo credit: M.Fina, 2008

- Change in processing distribution of B and C shares
- Potential increase of crab deadloss
 - Not a conservation concern because it is accounted for in their IFQ/ IPQ
 - Economic concern for harvesters and processor
 - Financial incentive for both parties to minimize deadloss
 - There may be circumstances where it is worth the risk for the harvester, due to the a decrease in costs, but that cost-saving is not passed on to the processor
- Could support live markets for crab if they develop

NEXT STEPS

- Determine if additional action should be pursued
- May identify a purpose and need and alternatives for an Initial Review Analysis if ready to move forward



THANK YOU TO CONTRIBUTORS:



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Ethan Nichols

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Janis Shaishnikoff

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Stakeholders:

Shannon Carroll

Lance Farr

Dave Fraser

Jamie Goen

Gretar Gudmundsson

Dan Le

Steve Minor

Edward Poulsen

Jake Jacobsen

Owen Kvinge

Sinclair Wilt

Caitlin Yeager