

C5 Crab Processing Use Caps

Initial Review



Sarah Marrinan, NPFMC

October 2023



Acronyms and terms for reference

PQS = processing quota share, long-term processing privilege (in “units”)

IPQ = individual processing quota, annual issuance of processing opportunity (in pounds), share-match with A share IFQ

Use caps = limit to the amount of a privilege that can be held or used

Leasing PQS= (sale of IPQ) temporary contractual arrangement where the associated risk and responsibility of the IPQ is passed on to the IPQ holder

Custom processing IPQ = contractual arrangement where the IPQ holder contracts with an unaffiliated processor facility to process their crab, but the responsibility and liability remain with the IPQ holder

Affiliation = relationship between entities used for accounting (e.g., use caps); CR Program uses the 10% rule- if an entity has a 10% or greater interest, ownership is 100% attributed to that entity

RCR = Registered Crab Receiver

Regional delivery requirements = some IFQ has a requirement that it is landed in a certain region (North – N of 56°20' N lat; South – not the North region; or West - W of 174° W long)

ROFR = right of first refusal, a provision of the CR Program that provides a representative community entity – that represents a location of historical crab processing – the opportunity to acquire PQS (and other assets) by agreeing to the same terms of a pending transaction



Acronyms page 2, terms described throughout document;
*note these are not necessarily regulatory definitions



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

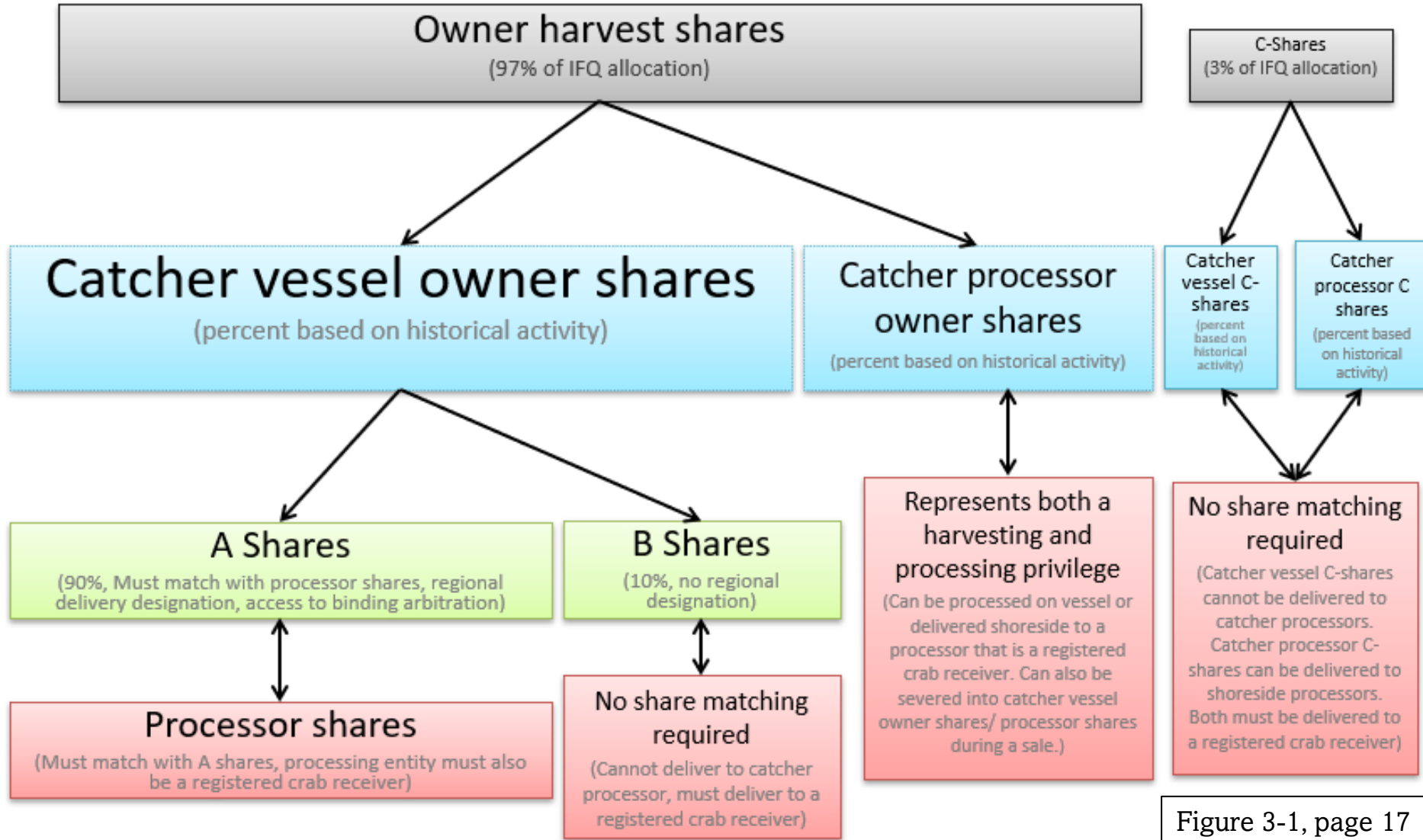


Figure 3-1, page 17



Catcher vessel owner shares

(percent based on historical activity)

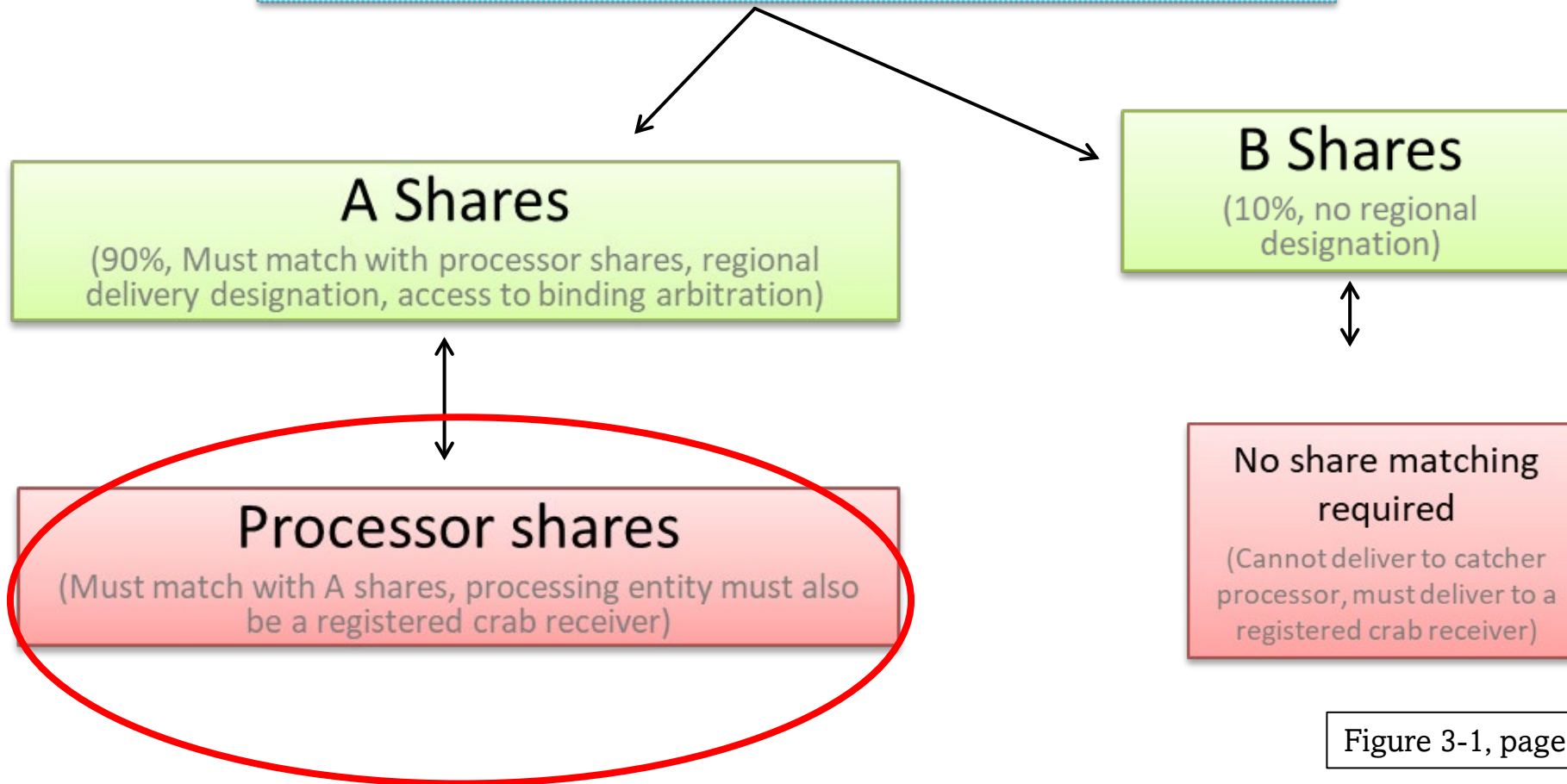


Figure 3-1, page 17



History of Action

June 2021

- Council received 5 letters proposing changes to current regulations that prohibit crab processing facilities from using more than 60% of the Eastern Aleutian Islands golden king crab (EAG) IPQ
- The letters explain of a live crab market opportunity with Royal Aleutian Seafood/ UniSea. Unaffiliated IPQ holders and associated harvesters wish to participate in this market; however, this facility is constrained from additional participation by the 60% facility use cap.
- At the June 2021 meeting, the Council also received a proposal to change the start date for both AI golden king crab fisheries (Eastern and Western)
- In response, the Council tasked a discussion paper to cover both issues.

October 2022

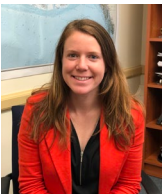
- The Council bifurcated these issues and scheduled this facility use cap piece independently.



History of Action

February 2023

- Council/AP considered a discussion paper for changing or removing the EAG facility use cap
- Public comment also added an additional request to include exemptions to the PQS/ IPQ use caps for custom processed Bristol Bay red king crab (BBR) and south-designated Bering Sea snow crab (BSS). With the possibility of low future catch limits, the testifier was concerned processing for these species could be constrained.
- Council established a purpose and need statement, 2 action alternatives and requested initial review
 - WAI was added to Alt 2 with EAG, as this is the only other fishery that this regulation applies to (WAI has been closed since (2004/05))
 - WAG was added to Alt 3 with BBR and BSS, as this is the only other fishery that would not be exempt from having custom processed IPQ count towards the PQS/ IPQ use caps



Purpose and need for action

- Significant percent of crab individual processing quota (IPQ) held by people who are not affiliated with a processing facility (i.e., requires custom processing)
- EAG and WAI have a unique cap that limits facilities to processing more than 60% of the IPQ issued for EAG or WAI
 - Action to remove cap could increase market opportunity for EAG
- PQS/ IPQ use caps include any custom processed IPQ for BBR, south-designated BSS and WAG IPQ processed east of 174° W longitude
 - Declines in BSS and BRR could lead to years with small fishery catch limits, which could create production inefficiencies with current caps
 - Action to exempt custom processing from these caps could increase efficiencies and increase the net benefits generated from these species
- Preserve ownership and entity use caps to limit consolidation



Alternatives

Alternative 1. No action.

Alternative 2. Remove the EAG and WAI processing facility use caps at §680.7(a)(9).

Alternative 3. Exempt custom processing of

- BSS IPQ with a south-region designation,
- BBR IPQ, and
- WAG IPQ processed east of 174° W longitude

from the PQS/IPQ and processing facility use caps under the program (add to list of exempted fisheries at §680.42(b)(7)(ii)(A)). Regionalization would still apply.



Regulatory caps on crab processing

Limits to how much PQS a person can hold §680.42(b)(i)

- No more than 30% of the PQS initially issued in the fishery
- Includes affiliations – 10% rule
- Exceptions for PQS holders that received an initial allocation in excess of this amount based on historical processing “grandfathered in” above the use caps

Limits to how much IPQ a person can “use” §680.42(b)(ii) and §680.7(a)(7)

- No more than the amount of IPQ resulting from 30% of the PQS initially issued
- Except if they were “grandfathered in”

Prohibition on how much a shoreside or stationary floating processor can process (even if they don't own IPQ) §680.7(a)(8)

- No more than 30% of the IPQ issued for a crab fishery
- Except if they were “grandfathered in”



Regulatory caps on crab processing

ORIGINALLY, the 30% caps on the *use* of IPQ originally included summing the total amount of IPQ that is:

- (1) held by that person;
- (2) held by other persons who are affiliated with that person through common ownership or control; and
- (3) any IPQ crab that is **custom processed** at a facility an IPQ holder owns.

NOW, there are a number of exemptions to this calculation.



Regulatory caps on crab processing - Amendments

Amendment 27 (effective June 2009)

Exempted customed processed IPQ from the PQS/ IPQ use caps in the following fisheries:

- Bering Sea snow crab with a north region designation
- Western Aleutian Islands golden king crab fishery, provided that IPQ crab is processed west of 174° W. long;
- Western Aleutian Islands red king crab fishery
- Eastern Aleutian Islands golden king crab fishery
- St. Matthews blue king crab fishery
- Pribilof red and blue king crab fishery



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- St. Matthews blue king crab fishery
- Pribilof red and blue king crab fishery

→ But also, added new 60% facility use cap to EAG and WAI fisheries for any shoreside or stationary floating processor east of 174° W. long;



Regulatory caps on crab processing - Amendments

Amendment 27 (effective June 2009)

These exemptions for custom processed IPQ only apply for processors operating at either a shore-based or a stationary floating processor facility that are within community boundaries.

In addition, an exemption was included for IPQ crab not counting to PQS/ IPQ use caps if it is or was subject to ROFR

AND

- Has been transferred from the initial recipient to another person
 - Received by an RCR who is not the initial recipient of those PQS, and
 - Received by an RCR within the boundaries of the eligible crab community for which that PQS and IPQ derived from that PQS is, or was, designated in the ROFR.
- This exemption is relevant for BBR and BSS (Table 3-3; page 20)



Regulatory Caps on Crab Processing - Amendments

Amendment 41 (effective June 2013)

- Established process for exempting from regional delivery requirements
- Includes exemption for custom processed IPQ counting toward the PQS/IPQ use caps

Amendment 47 (effective January 2017)

- Added *C. bairdi* fisheries to the list of fisheries for which custom processed IPQ does not count towards PQS/IPQ use caps
 - This leaves BBR, BSS with a south region designation, and WAG crab processed east of 174° W. long as the only fisheries for which custom processed IPQ DOES count toward the PQS/ IPQ use caps
- A discussion paper followed considering other types of options (raise the caps, convert to B shares, and only apply exemptions when the capacity did not exist), but these options did not appear to achieve the intended goal.



Description of affected crab fisheries

- EAG and WAG fisheries
- WAI fishery
- BSS fishery
- BRR fishery

- TAC & harvest
- # of vessels & landings
- Ex vessel price and gross value
- Spatial distribution of harvest
- PQS & IPQ holder information
- # of processing facilities and location



Count of processing entities

EAG

# of:	2019/20	2020/21	2021/22	2022/23
PQS holders	10	10	10	10
IPQ holders	7	8	6	7
facilities	4	4	3	2

WAG

# of:	2019/20	2020/21	2021/22	2022/23
PQS holders	10	10	10	10
IPQ holders	6	7	6	6
facilities	3	4	3	2

BSS

# of:	2019/20	2020/21	2021/22	2022/23
PQS holders	15	14	15	15
IPQ holders	10	10	9	
facilities	6	5	5	

BRR

# of:	2019/20	2020/21	2021/22	2022/23
PQS holders	13	13	13	13
IPQ holders	8	11		
facilities	6	6		



Table 3-8 & 3-9; page 32

Table 3-16, page 38; Table 3-20; page 42



Crab processing communities - profiles

Six communities received deliveries of BBR, BSS, EAG, or WAG between 2015 – 2022:

- Adak
- Akutan
- Dutch Harbor/ Unalaska
- King Cove
- Kodiak, and
- St. Paul



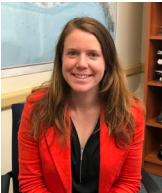
This section used existing sources to provide a consolidated profile for each community.



Alt 1: No action

Represents status quo regulations

- Processing facilities east of 174° W longitude would continue to be prohibited from using more than 60% of the IPQ issued in the EAG and WAI crab fisheries
 - Requires that more than one processor receives deliveries of EAG in order for TAC to be fully processed
 - Some unaffiliated IPQ holders and associated harvesters may not have the opportunity to process their EAG at a facility if it would exceed the cap (such as described in the proposals) – would need to identify a different facility to custom process with
- Custom processed IPQ for south-region BSS, BRR, and WAG processed east of 174° W longitude would continue to count toward the PQS/ IPQ use caps (unless qualified through ROFR exemptions)
- **Consolidation of processors can still occur under status quo**
 - Although use caps can provide market space for another processing facility – it does not guarantee that a processing facility will be available
 - Does not prevent consolidation up to the cap levels
 - Even beyond the caps, if processors choose not to operate harvested crab can be stranded (e.g., *C. bairdi* fisheries)
 - These decisions may be external to the use caps



Effects of Alt 2: Remove EAG and WAI facility use caps

- Would allow additional custom processed IPQ to the facility near the cap
- In recent years, there have been 2-4 processing facilities
- **The current caps are likely influencing the relative distribution of EAG IPQ between processor facilities and not the number of facilities**
- However, if this action is adopted it would not prohibit all EAG IPQ from being landed in 1 facility.
- It is not expected this would be the case in the near-term, as the recently active facilities also hold IPQ and it is expected they would continue to process their own IPQ.
- Overall impacts are highly dependent on external factors
- If the WAI remains closed, this action has no effect for this fishery. If it opens, this action could allow for more efficient deliveries and processing, especially if a TAC is small.



Effects of Alt 2: Remove EAG and WAI facility use caps

Processors

- Increased net benefits and production efficiency at the processor sector level
- Distributional impacts to owners of processing facilities (some may have more IPQ to process, some less)
- Beneficial to unaffiliated IPQ holders by potentially providing more custom processing market opportunities (such as this live market) and more competition for facilities
 - Unless the number of independent active facilities decreases (not expected in the short-term)
- Continued opportunities to enter into the processing market by purchasing or leasing PQS, or accepting deliveries of B or C class IFQ or CDQ crab

Harvesters

- Beneficial to harvesters that share-match with unaffiliated IPQ holders by potentially providing more custom processing market opportunities (such as this live market) and more competition for facilities
 - Unless the number of independent active facilities decreases (not expected in the short-term)

EAG Communities: Dutch Harbor/Unalaska & Akutan

- Consolidation can (and has) already occurred for EAG IPQ
- Recently processing has been in Dutch Harbor/ Unalaska – expected to continue
- Therefore, impacts from the proposed action are expected to be marginal.



Effects of Alt 3: Exempting custom processed IPQ from PQS/ IPQ use caps



Changes

- Would allow processing facility companies to process over the 30% use cap for BBR, south-region BSS, and WAG - with custom processed IPQ not counting towards the caps
- Would align the application of PQS/ IPQ use caps across crab fisheries

The same

- A person's direct and indirect PQS and IPQ holdings would still count towards the PQS/ IPQ use caps
- Regionalization would still apply



Effects of Alt 3: Exempting custom processed IPQ from PQS/ IPQ use caps

Processors

- Increased net benefits and production efficiency at the processor sector level
- Distributional impacts to owners of processing facilities (some may have more IPQ to process, some less)
- Beneficial to unaffiliated IPQ holders by potentially providing more custom processing market opportunities (such as this live market) and more competition for facilities
 - Unless the number of independent active facilities decreases (not expected in the short-term)
- Continued opportunities to enter into the processing market by purchasing or leasing PQS, or accepting deliveries of B or C class IFQ or CDQ crab

Harvesters

- Beneficial to harvesters that share-match with unaffiliated IPQ holders by potentially providing more custom processing market opportunities (such as this live market) and more competition for facilities
 - Unless the number of independent active facilities decreases (not expected in the short-term)

BRR, BSS, & WAG processing communities: Dutch Harbor/Unalaska, King Cove, St. Paul, Kodiak, Akutan, & Adak

- Consolidation and movement of IPQ can already occur under status quo
- Impacts would only be realized to the extent that this action facilitates the movement of shares to – or away from – recent processing communities
- Difficult to predict, but given current consolidation, marginal impacts are expected to be limited



Management and enforcement considerations

- NOAA Office of Law Enforcement has consistently identified challenges with monitoring and enforcing PQS/ IPQ use caps.
 - Complex web of entity affiliations
 - Complex regulations with many nuanced exemptions
- Due to this complexity, they are generally monitored and enforced on an ad hoc basis, when issues are suspected.
- Alternative 2 and 3 should reduce the monitoring and enforcement burden.
 - If adopted together, use caps would be consistent across fisheries.
 - And monitoring and enforcement would essentially be at the holder level – PQS and IPQ.



Next Steps

- Consider whether continued action is warranted.
- If warranted, identify a preliminary preferred alternative for consideration at final action.

Questions?

Sarah Marrinan

sarah.marrinan@noaa.gov



Extra slides



Table 3-6 EAG allocation, harvest, number of vessels, landings, and value, 2002/03 – 2022/23

Season	EAG						
	GHL/TAC (lb)	Harvest (lb)	Percent	Vessels (#)	Landings (#)	Ex vessel price	Total gross ex vessel
2002/03	3,000,000	2,821,851	94.10%	19	43	\$3.33	\$9,199,835
2003/04	3,000,000	2,977,055	99.20%	18	37	\$3.47	\$10,065,228
2004/05	3,000,000	2,886,817	96.20%	19	32	\$3.18	\$9,039,137
2005/06	3,000,000	2,866,602	95.60%	7	39	\$2.51	\$7,117,132
2006/07	3,000,000	2,992,010	99.70%	6	38	\$1.71	\$5,070,070
2007/08	3,000,000	2,989,997	99.70%	4	42	\$2.14	\$6,365,457
2008/09	3,150,000	3,144,423	99.80%	3	37	\$3.42	\$10,678,756
2009/10	3,150,000	3,150,474	100.00%	3	39	\$1.98	\$6,174,304
2010/11	3,150,000	3,148,188	99.90%	3	35	\$3.03	\$9,315,401
2011/12	3,150,000	3,150,374	100.00%	3	41	\$3.80	\$11,880,146
2012/13	3,310,000	3,315,115	100.20%	3	45	\$3.47	\$11,218,989
2013/14	3,310,000	3,302,061	99.80%	3	42	\$3.48	\$11,376,784
2014/15	3,310,000	3,307,016	99.90%	3	33	\$3.34	\$10,936,484
2015/16	3,310,000	3,302,480	99.80%	3	34	\$3.64	\$11,815,476
2016/17	3,310,000	3,307,162	99.90%	4	38	\$4.52	\$14,660,890
2017/18	3,310,000	3,308,185	99.90%	4	40	\$3.59	\$11,691,725
2018/19	3,856,000	3,854,105	100.00%	3	47	\$4.50	\$17,118,842
2019/20	4,310,000	4,308,530	100.00%	3	48	\$4.64	\$19,740,830
2020/21	3,650,000	3,650,255	100.00%	3	47	\$4.56	\$16,492,203
2021/22	3,610,000	3,614,798	100.10%	3	47	\$5.03	\$18,046,612
2022/23	3,320,000	3,321,060	100.03%	3	49	NA	NA



Table 3-7 WAG allocation, harvest, number of vessels, landings, and value, 2002/03 – 2022/23

Season	WAG						
	GHL/TAC (lb)	Harvest (lb)	Percent	Vessels (#)	Landings (#)	Ex vessel price	Total
2002/03	2,700,000	2,640,604	97.80%	6	73	\$3.50	\$9,117,906
2003/04	2,700,000	2,688,773	99.60%	6	60	\$3.83	\$10,109,101
2004/05	2,700,000	2,688,234	99.60%	6	51	\$3.29	\$8,706,763
2005/06	2,700,000	2,653,716	98.30%	3	47	\$2.12	\$5,549,420
2006/07	2,700,000	2,270,332	84.10%	4	37	\$1.32	\$2,978,071
2007/08	2,700,000	2,518,103	93.30%	3	39	\$1.79	\$4,454,290
2008/09	2,835,000	2,535,661	89.40%	3	42	\$1.91	\$4,791,631
2009/10	2,835,000	2,761,813	97.40%	3	41	\$1.96	\$5,322,370
2010/11	2,835,000	2,820,661	99.50%	3	38	\$3.53	\$9,803,355
2011/12	2,835,000	2,814,042	99.30%	3	40	\$3.72	\$10,313,779
2012/13	2,980,000	2,952,644	99.10%	4	36	\$3.30	\$9,554,574
2013/14	2,980,000	2,970,514	99.70%	3	34	\$3.50	\$10,081,665
2014/15	2,980,000	CF	CF	2	44	CF	CF
2015/16	2,980,000	CF	CF	2	50	CF	CF
2016/17	2,235,000	2,236,651	100.10%	3	37	\$4.50	\$9,664,768
2017/18	2,235,000	2,234,723	100.00%	3	41	\$3.67	\$7,997,779
2018/19	2,500,000	2,501,344	100.10%	3	36	\$4.49	\$10,987,299
2019/20	2,870,000	2,840,078	99.00%	3	44	\$4.50	\$12,534,971
2020/21	2,960,000	2,792,835	94.40%	3	38	\$4.51	\$12,311,834
2021/22	2,320,000	2,189,000	94.40%	3	41	\$5.49	\$11,728,085
2022/23	1,730,000	1,728,720	99.93%	3	43	NA	NA



Table 3-15 BSS allocation, harvest, number of vessels, landings, and value, 2002/03 – 2022/23

Season	BSS						
	GHL/TAC (lb)	Harvest (lb)	Percent	Vessels (#)	Landings (#)	Ex vessel price	Total gross ex vessel
2002/03	25,610,000	28,316,923	110.57%	190	285	\$1.75	\$48,496,278
2003/04	20,831,000	23,942,373	114.94%	189	265	\$2.04	\$48,359,092
2004/05	20,932,000	24,892,128	118.92%	168	219	\$1.79	\$44,144,504
2005/06	37,184,000	36,973,890	99.43%	78	350	\$1.51	\$55,291,202
2006/07	36,566,000	36,355,649	99.42%	69	307	\$1.37	\$49,111,061
2007/08	63,034,000	63,028,036	99.99%	78	513	\$1.63	\$102,072,731
2008/09	58,550,000	58,547,849	100.00%	77	487	\$1.37	\$79,464,730
2009/10	48,017,000	48,014,089	99.99%	69	354	\$1.13	\$53,645,621
2010/11	54,281,000	54,263,200	99.97%	68	386	\$2.14	\$115,523,133
2011/12	88,894,000	88,830,652	99.93%	72	724	\$1.89	\$166,973,717
2012/13	66,350,000	66,254,528	99.86%	70	505	\$2.02	\$113,088,320
2013/14	53,983,000	53,983,286	100.00%	70	450	\$2.15	\$115,438,494
2014/15	67,950,000	67,941,587	99.99%	71	543	\$1.67	\$112,275,497
2015/16	40,611,000	40,611,446	100.00%	74	390	\$2.01	\$80,936,867
2016/17	21,570,000	21,570,915	100.00%	63	266	\$2.72	\$58,026,393
2017/18	18,961,000	18,963,473	100.01%	63	261	\$3.00	\$56,464,897
2018/19	27,581,000	27,578,224	99.99%	61	313	\$3.00	\$82,036,383
2019/20	34,019,000	34,024,553	100.02%	59	373	\$3.15	\$105,928,621
2020/21	45,000,000	45,001,190	100.00%	62	407	\$3.01	\$132,857,821
2021/22	5,600,000	5,548,238	99.08%	43	140	\$4.45	\$24,384,308
2022/23	No commercial fishery						



Table 3-19 BBR allocation, harvest, number of vessels, landings, and value, 2002/03 – 2022/23

Season	BBR						
	GHL/TAC (lb)	Harvest (lb)	Percent	Vessels (#)	Landings (#)	Ex vessel price	Total gross ex vessel
2002/03	9,270,489	9,666,847	104.28%	242	272	\$6.13	\$59,016,000
2003/04	15,713,000	15,728,256	100.10%	250	296	\$5.05	\$78,253,116
2004/05	15,424,000	15,447,030	100.15%	251	294	\$4.64	\$70,936,658
2005/06	18,329,000	18,309,335	99.89%	89	296	\$3.85	\$70,086,741
2006/07	15,527,000	15,616,816	100.58%	81	213	\$3.37	\$52,277,156
2007/08	20,383,000	20,366,065	99.92%	74	281	\$4.16	\$84,211,504
2008/09	20,364,000	20,329,402	99.83%	78	289	\$4.97	\$100,222,813
2009/10	16,009,000	15,932,654	99.52%	70	233	\$4.44	\$70,172,988
2010/11	14,839,000	14,833,829	99.97%	65	254	\$6.31	\$92,924,994
2011/12	7,834,000	7,833,594	99.99%	62	161	\$8.91	\$69,479,174
2012/13	7,853,000	7,849,835	99.96%	61	141	\$7.28	\$56,914,521
2013/14	8,600,000	8,600,476	100.01%	53	156	\$6.41	\$54,763,067
2014/15	9,986,000	9,987,008	100.01%	63	159	\$6.05	\$59,849,844
2015/16	9,974,000	9,969,964	99.96%	64	152	\$7.02	\$68,754,179
2016/17	8,469,000	8,466,701	99.97%	63	148	\$9.06	\$76,311,556
2017/18	6,601,000	6,600,922	100.00%	61	142	\$8.33	\$54,792,098
2018/19	4,308,000	4,307,946	100.00%	55	121	\$8.45	\$36,176,631
2019/20	3,797,000	3,791,569	99.86%	56	116	\$9.04	\$34,208,234
2020/21	2,648,000	2,646,874	99.96%	47	95	\$9.11	\$24,086,513
2021/22	No commercial fishery						
2022/23	No commercial fishery						



Table 3-10 EAG PQS holdings by region, 2022/23

Share type	Share holdings by region and operation type				
	Region	# of PQS holders	% of QS pool	Mean % holding	Maximum % holding
Processor quota share	South	10	100.0%	10.0%	45.4%

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Table 3-14 WAI PQS holdings by region, 2022/2023

Share type	Share holdings by region and operation type				
	Region	# of PQS holders	% of QS pool	Mean % holding	Maximum % holding
Processor quota share	South	8	100.0%	12.5%	33.0%

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Table 3-21 BRR PQS holdings by region, 2022/2023

Share type	Share holdings by regional designation					Across regions		
	Region	# of PQS holders	% of PQS pool	Mean % holding	Maximum % holding	# of PQS holders	Mean % holding	Maximum % holding
Processor quota share	North	2	2.56%	1.28%	2.31%	13	7.69%	23.20%
	South	13	97.44%	7.50%	21%			

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Table 3-11 WAG PQS holdings by region, 2022/23

Share type	Share holdings by regional designation					Across regions		
	Region	# of PQS holders	% of PQS pool	Mean % holding	Maximum % holding	# of PQS holders	Mean % holding	Maximum % holding
Processor quota share	Undesignated	8	50.0%	6.3%	29.6%	10	10.0%	30.0%
	West	7	50.0%	7.4%	26.3%			

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Table 3-17 BSS PQS holdings by region, 2022/2023

Share type	Share holdings by regional designation					Across regions		
	Region	# of PQS holders	% of QS pool	Mean % holding	Maximum % holding	# of PQS holders	Mean % holding	Maximum % holding
Processor quota share	North	7	47.0%	6.7%	15.5%	15	6.7%	25.2%
	South	13	53.0%	4.1%	9.7%			

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Appendix 2 IPQ holder information

EAG - 2023/24		IPQ lbs	% of total	% of total
Processor-affiliated	ALYESKA SEAFOODS INC.	1	0%	76%
	ROYAL ALEUTIAN SEAFOODS INC.	1,261,569	45%	
	TRIDENT SEAFOODS CORPORATION	28,342	1%	
	WESTWARD SEAFOODS INC.	824,297	30%	
Unaffiliated*	57 DEGREES NORTH LLC	133,253	5%	24%
	GKC HOLDINGS LLC	183,390	7%	
	KEYPORT LLC	192,679	7%	
	OCEAN2TABLE ALASKA LLC	157,919	6%	
Total		2,781,450	100%	100%

BSS - 2021/22		IPQ lbs	% of total	% of total
Processor-affiliated	NORTH PACIFIC SEAFOODS INC	443	0%	69%
	PETER PAN SEAFOOD COMPANY LLC	629,711	16%	
	ROYAL ALEUTIAN SEAFOODS INC.	605,236	15%	
	TRIDENT SEAFOODS CORPORATION	1,013,337	25%	
	WESTWARD SEAFOODS INC.	522,437	13%	
Unaffiliated*	57 DEGREES NORTH LLC	691,568	17%	31%
	COASTAL VILLAGES CRAB LLC	169,282	4%	
	KEYPORT LLC	228,121	6%	
	NORQUEST SEAFOODS INC.	137,064	3%	
	Total	3,997,199	100%	

WAG - 2023/24		IPQ lbs	% of total	% of total
Processor-affiliated	ROYAL ALEUTIAN SEAFOODS INC.	121,371	16%	47%
	TRIDENT SEAFOODS CORPORATION	7,883	1%	
	WESTWARD SEAFOODS INC.	229,083	30%	
Unaffiliated*	APICDA JOINT VENTURES INC.	229,470	30%	53%
	KEYPORT LLC	131,416	17%	
	OCEAN2TABLE ALASKA LLC	45,522	6%	
Total		764,745	100%	100%

BBR - 2020/21		IPQ lbs	% of total	% of total
Processor-affiliated	ALYESKA SEAFOODS INC.	120,207	6%	76%
	PETER PAN SEAFOOD COMPANY LLC	47	0%	
	PETER PAN SEAFOODS INC.	249,422	13%	
	ROYAL ALEUTIAN SEAFOODS INC.	378,379	19%	
	TRIDENT SEAFOODS CORPORATION	534,632	27%	
	WESTWARD SEAFOODS INC.	227,590	11%	
	Unaffiliated*	57 DEGREES NORTH LLC	245,168	
ALEUTIA INC		105,203	5%	
APICDA JOINT VENTURES INC.		10,690	1%	
COASTAL VILLAGES CRAB LLC		93,466	5%	
KEYPORT LLC		20,751	1%	
Total		1,985,555	100%	100%