

Proposed workplan for the program review of the Bering Sea/Aleutian Island Crab Rationalization Program

September 15, 2023¹

This workplan is designed to provide stakeholders and policy makers with a proposed guide for the development of the Bering Sea and Aleutian Islands (BSAI) Crab Rationalization (CR) Program's 17-year review. Program reviews are required by the Magnuson-Stevens Fishery Management and Conservation Act of 2006 (MSA). This program review is scheduled to be completed in early 2024. The last CR Program review (the 10-year review) was completed in 2016.

The Council reviewed a staff document presented at the April 2023 meeting to help focus the program reviews to the necessary information. Previous CR Program reviews include extensive background information on the management of the program and how it met the CR Program's stated objectives. They will serve as a useful starting point for this review and will serve as reference documents for program impacts that have been realized but have not changed from the previous reviews.

Workplans are intended to identify the proposed scope of the program review and serve as a starting point for dialogue between stakeholders, policy makers, and the analysts. That dialog may result in workplan modifications to ensure that areas of interest are addressed that were not included in the draft workplan. Workplans are typically presented to the Scientific and Statistical Committee (SSC), Advisory Panel (AP), and North Pacific Fishery Management Council (Council). Based on direction from the Council, after all the advisory bodies receive public comment and provide recommendations to the Council, the workplan may be modified and the preparation of the program review begins. The intent for this workplan is to receive input at a single meeting and begin the analysis.

The structure of this workplan is based on issues considered during the development of the 10-year CR Program review, guidance from the program review document presented to the Council at its April 2023 meeting, guidance developed by NMFS, and a general understanding of major changes that have occurred in the fishery. The proposed workplan is somewhat scaled back and modified version presented in 2015. This workplan places less emphasis on providing very detailed data on how the program worked when it was initially developed, as that information has been presented in past reviews, and is more focused on how it works under current fishery conditions. The CR Program review will also consider how the program may function in the near future, given the types of management changes that the Council is currently considering.

The workplan outline includes three primary sections. Section 1 describes the requirements for a program review. Section 2 highlights sources that were considered when developing the proposed of the scope of the review. Section 3 is a broad annotated table of contents based off the outline from the CR Program 10-year review. That section provides a detailed scope of work, the methods, and content expected to be produced. Appendix 1 provides the full table of contents from the 10-year review which will guide the contents for this proposed review.

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1. Requirements for a program review and history of CR Program reviews

Section 303A(c)(1)(G) of the MSA requires a catch share program review every 7 years after the initial 5-year review. Councils are given the authority to conduct reviews more frequently.² The first CR Program review occurred 1.5 years after its implementation. The focus of the review was the distribution of benefits between harvesters and processors because this program included Congressional authority to allocate processor shares, an arbitration system to help establish exvessel prices, and different harvest share types.³ A 3-year preliminary review was presented in 2008.⁴ A more extensive 5-year review was completed in 2010.⁵ The 10-year review of the CR Program was delayed one year to allow additional data to become available and was completed in 2016.

2. Establishing a scope for the review

The CR Program did not define a list of required elements that must be included in the program review. The Council may request information that it considers necessary to evaluate this program relative to its original and current program objectives. The Council did define the baseline period years for program reviews as the average of 1998/99, 2001/02, and 2004/05 fishing seasons rather than three consecutive years preceding program implementation. Given the time that has passed, less emphasis might be placed on comparing against the average of the baseline years than earlier reviews. Some data are available for the baseline years, but other information is not (e.g., quota transfer prices). Within MSA the National Standards (Section 301) and the required elements of limited access privileges programs (LAPPs; Section 303A) may also serve as a guide to aid in defining the scope of the program review and in evaluating the program.

In addition, NMFS produced a Catch Share Policy document effective April 2017 that provides policy recommendation for guiding principles when conducting reviews of catch share programs.⁶ NMFS Catch Share Policy guidance document provides a comprehensive approach to conducting regular reviews of catch share programs. NMFS guidance was developed to ensure that the reviews meet statutory requirements, are coordinated with stakeholders, efficient, effective, and conducted using consistent standards across all management regions. NMFS guidance states that the review should compare and analyze the fishery before (baseline period) and after the program's implementation and should use the best available scientific information. As noted earlier, comparisons to the baseline have been made in previous CR Program reviews and will be included by reference when appropriate and other information will be updated and included in this review. The NMFS procedural guidance document states that the CR Program reviews should at a minimum contain the following eight elements.

² When the CR Program was implemented, the final rule stated that a full review of the program would be undertaken in 2010 (5 years after implementation) and additional reviews would be conducted every 5 years. In April 2019, after the 10-year review had occurred, the Council determined it would henceforth adhere to the 7-year review schedule as prescribed in the MSA, rather than the more frequent 5-year review period the Council had previously requested.

³ The 18-month review is available at: http://www.npfmc.org/wpcontent/PDFdocuments/catch_shares/Crab/18MonthRev.pdf.

⁴ The 3-Year Review of the Crab Management Program for the BSAI Crab Fisheries is available at http://www.npfmc.org/wpcontent/PDFdocuments/catch_shares/Crab/3yearreview1208.pdf.

⁵ https://meetings.npfmc.org/CommentReview/DownloadFile?p=9e6bd6fd-9491-4563-bf24-bef0b0567758.pdf&fileName=C2c_5year%20Crab%20Review.pdf.

⁶ NMFS Catch Share Policy 01-121-01 guidance for catch share program reviews is due for review in December 2023 and can be found at <https://media.fisheries.noaa.gov/dam-migration/01-121-01.pdf>.

1) *Purpose and need of the CR Program review*

This section will focus on the MSA requirements for reviews described earlier in this paper.

2) *Goals and objectives of the program*

Rather than explicitly identifying a list of program goals, the Council's Problem Statement for the CR Program lists the primary areas of concern that existed within these pre-rationalization crab fisheries. Assuming that addressing these identified problems was, in fact, the chief objective of the program, these include:

- promote resource conservation, utilization, and address management problems,
- reduce bycatch and its associated mortalities, and potential landing deadloss,
- reduce excess harvesting and processing capacity, as well as discourage a system that promotes low economic returns,
- promote economic stability for harvesters, processors, and coastal communities,
- eradicate the high levels of occupational loss of life and injury,
- address the social and economic concerns of communities,
- promote efficiency in the harvesting sector, and
- promote equity between the harvesting and processing sectors, including healthy, stable, and competitive markets.

3) *History of BSAI crab fishery management*

In March 2005, NMFS issued a final rule implementing the CR Program under Amendments 18 and 19 to the BSAI Crab FMP. The CR Program was effective for the 2005/2006 crab season that began in August 2005. The CR Program covers the following fisheries: Bristol Bay red king crab (BBR), Bering Sea snow crab (BSS), Eastern Bering Sea Tanner crab (EBT), Western Bering Sea Tanner crab (WBT), Pribilof blue and red king crab (PIK), St. Matthew Island blue king crab (SMB), Western Aleutian Islands golden king crab (WAG), Eastern Aleutian Islands golden king crab (EAG), and Western Aleutian Islands (Adak) red king crab (WAI). Two fisheries managed under the BSAI crab FMP, Norton Sound red king crab (NSR) and Pribilof Islands golden king crab (PIG), are excluded from the CR Program.

Mirroring the organization of the 3-, 5-, and 10-year reviews, this 17-year CR Program review will include a description of the Federal and State of Alaska authority over the Federal BSAI crab fisheries off the coast of Alaska, a brief description of pre-rationalization management, and current management elements of the CR Program, highlighting amendments to the program. Repetition in these sections from the previous reviews of the program are included as necessary, but much of the information will be included by reference to provide a comprehensive description of program management. All amendments to the CR Program will be included.

4) *Description of the biological, ecological/environmental, economic, social, and administrative environments before and since program implementation*

The review intends to describe the program's effects on net benefits to the nation, to the extent possible, and will consider changes in economic impacts at the community level. The review is intended to provide sufficient background information to understand the analyses, without providing excessive or unnecessary information. The scope of the review will be sufficiently comprehensive, using available data and resources, to understand the changes and impacts of the various CR Program elements. Interdependencies between related fisheries and the spillover effects on other fisheries will also be considered. A firm's entire operation will be considered to the extent CAS data, Crab Program Economic Data Reports (EDRs), and other readily available sources allow. Comparisons to other fisheries are complicated because many fisheries are conducted over a calendar year, but the crab fisheries include portions of two

years. The review will make use of standardized performance indicators or metrics developed at the national level, including biological, economic, and social indicators.

Standardized biological indicators identified in the NMFS guidance included information contained in the most recent stock assessment. These indicators would include information on environmental factors that may be affecting stocks. Other key biological indicators will include changes in bycatch, discard mortality, and fishery closures that can be obtained from stock assessment reports, observer program reports, SAFE reports, and annual specifications. ADF&G staff are anticipated to both provide guidance and assist in drafting the section(s) associated with biological indicators.

Standardized economic indicators have been identified by NMFS staff when considering catch share programs.⁷ Quota setting, not exceeding the quota, and fishing season lengths will be used to describe the management context. Not exceeding the quota is an indicator of compliance or capability to effectively monitor quotas. Increased season length is an indicator of the expanded flexibility to harvest the available quota, market conditions, improved operational conditions, and safety. Reductions in the number of active vessels after the program was implemented may represent progress toward meeting capacity reduction objectives. To ensure that consolidation does not go beyond the level intended, excessive share limits of the total limited access privileges allocated under the program and accumulation caps were established. These caps represent an upper limit that may be reached and are not an objective to be obtained. Changes in the excessive share caps after the program was implemented could indicate unanticipated changes in the fishery. Several interrelated performance indicators may provide information on overall economic benefits and economic efficiency. Utilization of quota, average price for QS sales, average prices for annual quota pound transfers, total catch share program revenues, and revenue per vessel are examples of these indicators. Information on loan repayment associated with the capacity reduction program will also be included. Progress on loan repayment ranges from some fisheries having repaid its loan to other smaller fisheries that have either not been opened to directed fishing or have had limited openings that have accumulated unpaid interest that is about equal to the loan's principal amount.

Standardized social indicators include fishing engagement and reliance. These data include commercial fishing engagement, commercial fishing reliance, recreational fishing engagement, recreational fishing reliance. Because of the structure of BSAI crab fisheries, the focus is on the commercial fisheries. Environmental Justice indicators include poverty, population composition, and personal disruption. Climate change indicators include sea level rise, and storm surge. Social Economic indicators include local labor force, transition to a new generation of fishermen, and housing disruption. Social Economic indicators used by NMFS that may not apply well to the CR Program include gentrification pressure and urban sprawl. In addition to these issues, studies conducted by staff also include information on community tax revenues and their role in supporting local infrastructure.

NMFS guidance recommends using quantitative estimates of indicators when available. However, if sufficient data are not available, a qualitative assessment is acceptable.

5) *Analysis of program effects*

Several sources of data are available to help understand the impacts of the CR Program. Catch Accounting System (CAS) provides detailed data on catch. Commercial Operators Annual Report (COAR) data provides information on the exvessel and first wholesale value of landings. EDRs provide detailed cost and earnings information⁸. Information from the listed sources is included in the annual Crab SAFE report and will be a primary source of information included in this document. The analysts note that 2022 value data from COAR data may be available for the 2022 fishery during October 2023 and that

⁷ https://www.st.nmfs.noaa.gov/Assets/economics/catch-shares/documents/Catch_Shares_Report_FINAL.pdf

⁸ https://www.psmfc.org/alaska_crab/

information will be included in the 17-year review if it is available. CR Program EDR data for 2022 may also be available.

In addition to the previously mentioned data, other sources of information described earlier may also be utilized. For example, public comments are an informative and important resource to influence the policy scope of issues highlighted in this review and provide information. The Council will receive that input at the October 2023 meeting.

Finally, NMFS recommends that a wide variety of issues are considered under the program review process, but not all components of a LAPP may be equally important for all fisheries. If the Council determines a component is not essential to the program review, the Council should document its rationale for not conducting a formal analysis of that component. If a component is already the subject of a management action, a summary of the description, rationale, and status of the action will be sufficient (e.g., active participation to retain crew shares).

6) *Evaluation of program performance with respect to goals and objectives*

Each of the stated goals and objectives of the program will be analyzed. Information from previous reviews as well new information that has become available over the past 7 years will be included by reference or as sections of the CR Program review.

7) *Summary of unexpected effects*

A summary of unexpected effects will be included. It is anticipated that, to the extent these issues are identified, they will be initially described in other sections of the document. It is too early in the analytical process to determine all those issues, but they could include dramatic reductions in the estimated size of certain crab stocks and the causes of those changes and COVID-19 impacts, noting whether the unexpected impacts could be influenced by the CR Program.

8) *Identification of program issues and need for additional data collection and research*

The focus will be on Council actions that are currently under consideration and those that may be identified as part of this CR Program review. Issues that have been identified are currently being reviewed by the Council. Examples include crew “C share” active participation requirements and processing excessive share limit modifications. Issues that are still in the Council’s “batters-box” include the Aleutian Islands Golden King Crab start date. The need for additional research may include environmental research to better understand changes in crab stocks. Some of this research is ongoing and will be described in the report. Other research projects may be identified through stakeholder and agency staff input. Additional data collections may be identified as part of this review process.

3. Annotated proposed table of contents

The intention for the 17-year CR Program review is to follow the general structure of the 10-year program review, with the same sections and subsections expect when there are opportunities to streamline and reference back to the 10-year review or topics that may warrant more attention based on recent conditions. A detailed, slightly modified version of the table of contents from the 10-year review is included as Appendix 1. The section below is an annotated version of the table of contents, that provides more detail on the plan for each section.

EXECUTIVE SUMMARY

The executive summary will include the key findings of the CR Program’s 17-year review.

1 INTRODUCTION

This section will include a description of the objective of the review. It will detail the legal requirements to prepare a program review and available authoritative guidance. The introduction will lay out the scope of the analysis and describe the data sources that are used within the document. If data are used from sources that are not traditionally utilized in Council analyses, a more detailed description of those sources will be included.

2 DESCRIPTION OF MANAGEMENT

The 10-year review of the crab program included a comprehensive description of the management elements implemented at the creation of the program as well as changes to the program that had been implemented/considered up to when that review was drafted. That information will be updated, summarized, and/or referenced when consistent with the current design of the program. The review will also highlight the responsive nature of the Council’s and ADF&G’s management process, by describing Council actions modifying the program since the 10-year review. The following table details Council actions associated with the BSAI crab over the past seven years. Additional information may be found in the KTC FMP Amendment Summary document prepared by Council staff.⁹

Some recent rules have not yet been implemented and therefore limited information may be available on the impacts of the new or proposed provisions. These amendments and recent Council actions will also be integrated into the relevant section of the review. For example, the Snow crab rebuilding plan will impact all sectors and communities that rely on that fishery. A discussion of that action may be included in sections regarding biological, economic, and community impacts, even though that action is not a direct result of the CR Program. There are other items listed in the table that were considered by the Council but not advanced. Those issues are included as a reminder of past Council considerations. Discussion papers that were developed when those issues were considered are noted to provide additional background.

⁹ https://www.npfmc.org/wp-content/PDFdocuments/Publications/Crab_Amendment_Summaries.pdf

KTC FMP Amendment Number	Topic	Status
No amendment number; <i>Action under consideration</i>	Change the start date for the Aleutian Islands gold king crab fisheries	Not yet scheduled
No amendment number; <i>Action under consideration</i>	Crab processing facility and PQS/ IPQ use cap	Initial Review October 2023
No amendment number; <i>Action under consideration</i>	Crab C share recent participation requirement	Initial Review June 2023
Amendment 53	Eastern Bering Sea snow crab rebuilding plan	Under NMFS Regional Review
Amendment 52	Revise regulations on Economic Data Reports requirements for groundfish and crab fisheries off Alaska	FR published Feb 6, 2023; Effective March 8, 2023
No amendment number; Temporary rule	Emergency action: Suspend C Share recent participation requirement	FR published July 15, 2022; Effective July 15, 2022 – Jan 11, 2023
No amendment number; Request for information	Council Request for Information on Bristol Bay Red King Crab and Eastern Bering Sea Snow Crab Mortality Mitigation Measures	FR published July 14, 2022
No amendment number; Regulatory amendment	Removing the Prohibition on Continuing to Fish After a Partial Offload	FR published Nov 13, 2020; Effective Dec 14, 2020
Amendment 51	Add to or modify language in the Crab FMP to more transparently reflect and align the FMPs with the way bycatch is currently reported	FR published Sept 13, 2021; Effective Sept 17, 2021
Amendment 50	St. Matthew blue king crab rebuilding plan	FR published Nov. 9, 2020; Effective Oct 13, 2020
No Amendment number; No action taken	Consideration of replacing paper Daily Fishing Logbooks with electronic logbooks	Discussion paper Feb 2019; Cost analysis Feb 2020
Amendment 49	Update the description and identification of essential fish habitat	FR published July 5, 2018; Effective May 31, 2018
Amendment 48	Determine limited access privileges held and used by CDQ groups	FR published Nov 9, 2017; Dec 11, 2017
No amendment number; No action taken	Additional long-term solutions for EBS Tanner crab PQS/ IPQ use caps for custom processed IPQ	Discussion paper April 2017
No amendment number; No action taken	Considering adding operational costs into the non-binding price formula for the arbitration system	Discussion paper April 2017
Amendment 47	Exempt custom processed EBS Tanner IPQ from being applied against the PQS/ IPQ use caps	FR published Dec 20, 2016; Effective Jan 19, 2017
No amendment number; Temporary rule	Exempt custom processed EBS Tanner IPQ from being applied against the PQS/ IPQ use caps for the 2015/16 crab year	FR published Jan 26, 2016; Effective Jan 26, 2016 – June 30, 2016

3 STOCK STATUS AND BIOLOGICAL INDICATORS

ADF&G staff has provided this section for the past program reviews and have been requested to update the information in this section. The section is anticipated to follow the same general format as past reviews, but ADF&G staff have the flexibility to address any issues they determine are important to understanding the impacts of the CR Program.

4 HARVEST SHARE HOLDINGS

Previous program reviews described the development of the harvest privilege allocation including the moratorium on vessel entry that preceded the license limitation program (LLP). Those reviews also described the initial allocation of quota share among harvesters and the transfers that had occurred up to the time the review was drafted. Initial allocation information has not changed from what was previously presented, but the transfer statistics, as well as current holding could be a valuable update to understanding the market for different types of quotas. The crab program has catcher vessel QS use caps established by share type and fishery that apply to catcher vessel QS transfers. This section will evaluate the number of entries at or near these caps. Based on that understanding, the focus will be on transfers of QS and current quota holdings. Information on the C share issues the Council is currently addressing will be included in this section.

5 HARVEST SECTOR

The Council's problem statement included development of a program promoting economic stability and efficiency, in part by reducing excess harvesting capacity. Excess capacity reductions in the fishery over time can be illustrated with participation data. Participation can be illustrated by various indicators including number of vessels, percentage of quota harvested by vessel, median harvest per vessel over time, or changes in other fleet characteristics. These descriptions will be updated based on data developed for the Crab Economic SAFE document.

Active participation in the crab program has been an area of interest. There is no definition of "active" participation for persons or vessels. There is some information available on which participants may be active in the fleet. This information is derived from the EDR data that requires the reporting of crew license numbers (ADFG crew licenses or CFEC vessel operator permit number) for all crew on vessels during the year when fishing under the CR Program. The available data does not provide information to show if a QS holder was on board a vessel in the past year or set of years. The number of entities that lease quota at arm's length and the percent that the lease quota is available. Crew QS that are held by active licensed operators can be provided.

Information on short-term transfers of IFQ (leasing) and the cooperative management structure can be provided. Cooperatives that formed the first year(s) of the program are not the same cooperatives that existed in the most recent seasons. Based on the first year of cooperative reporting this section could be updated to include a current description of the cooperatives and how this management structure aligns with goals of the program.

Lease rates for CR Program species are also available. Cooperative reports address this issue and the EDRs were revised to capture the quota shareholder's arm's length lease rate. This information can be used to provide an updated description of the lease rates over time. QS transfer and lease rates also provide some insight into the economic health of the fishery. Tracking these values over time may provide stakeholder expectations on economic returns during a year or over the long-term, all else being equal.

Vessel gross earnings and operating costs will be derived from a combination of sources including ADF&G fish ticket data, eLandings, CFEC ex-vessel pricing, ADF&G Commercial Operator's Annual Report (COAR) data, and EDR database.

The program's impact on captains and crew will be updated with information regarding crew size, harvest, wages for captain and crew, and percent of gross revenues paid to crew over time. This information is made available from the EDRs, but due to confidentially regulations it is primarily available for the BBR fishery and the BSS fishery, during years those fisheries were open.

Information will also be provided on the repayment of loans under the Fishing Capacity Reduction Program. Repayment of these loans is an expense to participants in the program. Fees are paid on harvests of certain crab species.

6 PROCESSOR SHARE HOLDINGS

Like the section on harvest share holdings, this section will reference and provide limited information on the initial allocations of Processor Quota Share (PQS), and regional distinctions (i.e., North versus South). PQS and IPQ use caps that limit the pounds of crab which can be held (PQS) and processed (IPQ) based on the annual catch limits will be described in this section with references to current papers on this issue being developed by Council staff.

This section will also highlight transfers of PQS. The right of first refusal contract provisions that were put in place to protect community interests in crab processing will be briefly described. Reference will be made to analyses that modified this provision.

7 PROCESSING SECTOR

Like the harvest sector, the Council's goals for the processing sector include promoting economic stability, and eliminating excess capacity that promotes a system of low economic returns. The program was also designed to promote equity between the harvesting and processing sectors with the goal of creating healthy, stable, and competitive markets. Changes in participation and historical processing amounts can inform stability in this sector. The intent is to update descriptive information about the count of active processors accepting certain species by quota share category, changes to the distribution of landings, and the processing labor sector force. If we can include the most recent year's data (2021/2022 fishing year), impacts of factors outside of the CR Program will be noted when they would impact the reported metrics. For example, low stocks that lead to fishery closures are generally thought to be driven by factors (e.g., increased water temperatures) that are outside the CR Program's ability to control.

8 CDQ AND ADAK PARTICIPATION IN CR PROGRAM FISHERIES

Community Development Quota (CDQ) groups and the community group representing Adak annually receive 10 percent of each the program's fishery allocations. This section will detail the extent of the CDQ and Adak holdings under the program and the integration of fishing CDQ and the Adak allocation with program allocations. These program elements were included to address specific community stability goals identified in the problem statement and National Standard 8.

9 CRAB MARKETS AND PRICES

This section will reference work in previous program reviews as well as providing updated information to the extent it is available. Updates to the market profiles are being developed by the AFSC and its contractor. The arbitration system will be described, referencing work from previous CR Program reviews and a discussion paper developed by Council staff.

10 ENTRY OPPORTUNITES

This section will compare entry opportunities before the CR Program was implemented, to transfer opportunities of quota after the rationalization program was implemented. The pre-CR Program information will be primarily from previous reviews. The intent for the 17-year review is to update information on QS and annual quota transfers and the value of these transfers. Information will also be presented on C share transfers and prices, to the extent it is available.

Additionally, this section will highlight the pending regulatory changes to the C share participation requirements and expected impacts of those changes. Information on cooperative reporting describing voluntary efforts they and their members have made to address active participation will also be included.

11 SOCIAL AND ECONOMIC COMMUNITY IMPACTS

The 5-year review included a detailed Social Impact Assessment (SIA) that was an appendix to the analysis. Community Profiles were included for Unalaska/ Dutch Harbor, St. Paul, King Cove, and Kodiak. A SIA was included in the crab 10-year review, but the community profiles were not updated. The social and economic community impact component of the 10-year program review focused on updating the participation description by sector at either the community or region level (depending on data confidentiality). That section included information pre- and post- implementation, focusing on what changed (or did not change). The 17-year review will not include an SIA but will include updated information from recent community profiles. Information, in addition to the catch and value data by community that can be provided within confidentiality rules will focus on information provided in the most recent Annual Community Engagement and Participation Overview (ACEPO) report, community profiles (including those recently updated), and stakeholder input.

Information in the 10-year review that will be updated includes three primary areas.

1) Quantitative Participation Description by Community and Economic Trends

This section of the document will update tables illustrating the patterns of participation in fisheries by community, to the extent possible. In most cases the quantitative information was previously presented and discussed by fishery sector (harvesters, catcher processors, and processors) because confidentiality limited the types of quantitative information that can illustrate community level characteristics. For example, if a community is home to only one processor, value, or volume of harvest would need to be aggregated to the regional level where there are data represented from at least three entities, depending on the data source. It will also include other social indicators as appropriate.

The economic trends will include discussions of Alaska local fleet sizes, and season lengths and average days fished per vessel will be updated as available data allow. Brief discussions of any other fishery or economic trends that impact the communities will be considered, if any are identified as relevant.

2) Summary of Social Impacts of BSAI Crab Rationalization by Community

This section previously provided a summary of the social impact of a selection of eight communities in a more succinct way than the Community Profiles. Information presented here was primarily qualitative and thus can operate at a community frame of reference. This summary will rely on available existing secondary data as supplemented by comments provided during public comment periods, and stakeholder discussions with the authors. Fieldwork is not planned under this scope of work.

3) Summary of Other Issues

This section, like the section in the 10-year program review, will continue to track issues initially identified as potential social impact issues in the pre-implementation SIA. This section will also consider the social and economic community impacts, if any, of actions taken or considered, and rules implemented in the BSAI crab rationalization program from 2016 through 2023.

12 MANAGEMENT, MONITORING, AND ENFORCEMENT

LAPPs under the MSA are required to include an effective system of enforcement, monitoring, and management. This section is intended to highlight changes in management and enforcement burden both since program implementation, as well as specifically in the past seven years. Representatives from Alaska Enforcement Department, US Coast Guard, and NMFS Office of Law Enforcement (OLE) will be

consulted for descriptions of management and enforcement issues that have arisen, particularly over the past seven years. This section is expected to be qualitative.

13 COST RECOVERY

Section 303A(e) of the MSA mandates that NMFS collects fees to pay for the costs of management (including data collection and analysis, and enforcement activities) arising from the program. The cost recovery fee is charged as a percentage of the exvessel landings value of each allocated species. This section will update the table on management costs and cost recovery fees to provide information on costs being recovered and their amount. Much of the information included in this section will be derived from the annual cost recover reports generated by NMFS. It will also include information on the ADF&G Shellfish Observer Program Test Fishery Account.¹⁰

14 FISHING VESSEL SAFETY

Concerns with the occupational life lost and injury in a competitive, derby style fishery was one of the primary reasons for the rationalization program. Improved safety is both a goal implied in the problem statement that established the program as well as a requirement of LAPPs under the MSA. The National Institute for Occupational Safety and Health (NIOSH) will be requested to query its occupational safety database to evaluate fatalities and injuries in the CR Program fisheries from the baseline period through the most recent information available. That information will be summarized and provided.

15 SIDEBOARD LIMITS IN OTHER FISHERIES

This section will detail the harvester and processor sideboard limits that were based on historical participation. Amendment 34 revised the sideboards for a small number of CR Program participants in the GOA Pollock and Pacific cod fisheries. Staff intends to evaluate crab harvester diversification in other fisheries throughout the first 17 years of the program, with a particular emphasis on the years since the most recent CR Program review.

16 SUMMARY AND CONCLUSION

The final section of review intends to summarize key areas that appear to be consistent with goals of the program, requirements of LAPPs under the MSA, and the National Standards. This section will also highlight areas that appear to represent the greatest challenges in reaching these objectives, as well as a discussion on the Council's ability and/or authority relate to those challenges.

17 LIST OF PREPARERS

18 CONTRIBUTORS

19 REFERENCES

¹⁰ https://www.adfg.alaska.gov/static/fishing/PDFs/commercial/bering_aleutian/fy22_adfgreporttoCOOTF.pdf

4. Appendix 1: Detailed Table of Contents Based on the 10-year Program Review

This is a slightly modified version of the 10-year program review that will be used as a guide for the 17-year review.

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