

CPT Input: Proposal to allow crab rationalization program vessels to conduct a partial offload of crab and continue to fish prior to delivering the remainder of crab

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In April 2018, the Council received a proposal from the Pacific Northwest Crab Industry Advisory Committee (PNCIAC), requesting the removal of a regulatory prohibition that bans vessels fishing for Crab Rationalization (CR) crab from conducting a partial offload of crab and then continuing to fish, prior to the offload of any remaining crab. Crab vessel can do partial deliveries at multiple plants currently, but (except for the Western AI golden king crab fishery) they can't fish or haul gear in between deliveries. The Council initiated a discussion paper in order to consider removing this regulation for *all* CR Program fisheries. In April 2019, after receiving the discussion paper and hearing more testimony, the Council moved this action forward for Initial Review analysis. **This analysis is being prepared for the June 2019 Council meeting.**

Crab harvesters and NOAA Office of Law Enforcement (OLE) have both noted occasional situations where this regulation has created an economic obstacle. For example, if a vessel is fishing around the Pribilof Islands and the ice is progressing down from the north, the vessel may wish to remove the gear from the grounds as quickly as possible. Some vessels may not be rated to carry full tanks of crab in addition to all their pots. In this case they may wish to deliver some of their crab in St. Paul, haul their pots and continue on to Dutch Harbor to deliver the remainder of their crab. Hauling their gear alone may be considered "fishing" under current definitions. A number of other anecdotes such as this have been highlighted; the circumstances are always a little different.

PNCIAC expects the opportunity to conduct partial offloads of crab to benefit crab harvesters in emergency situations or special circumstances related to the safety or economics of the operations. Given the risk of deadloss and the economic benefits of offloading efficiency in most circumstances, the industry does not expect this practice to become standard operating procedure.

The primary concern from the proposed action has to do with ensuring proper accountability.

While this prohibition was initially included in the CR Program to alleviate enforcement concerns about illegal discarding, those concerns have since been considered unwarranted. However, the practice of offloading all crab before returning to fish has greatly simplified the monitoring and accounting associated with crab harvesting.

The analysis will highlight some ways this action could complicate the accounting process and potentially degrade the quality of some of the data by statistical area. ADF&G protocol for collecting information (Confidential Interview Forms and collecting the Daily Fishing Logbook pages), protocol for retained catch sampling, and observer duties would all need to be reevaluated in the context of a trip with a partial offload (i.e. is it considered one long trip, a trip-within-a-trip, or two separate trips?) for reporting and sampling purposes.

In addition, the primary data quality concern has to do with maintaining information on catch and effort by statistical area.

For instance, in a delivery that occurs after a second round of fishing, when "older" and "newer" crab are comingled in tanks, it may not be possible to identify which crab was harvested from where and the characteristics that are associated with that fishing. There may be a way to require notification of these types of partial delivery trips so they may be tracked. However, without knowing how much crab was attributed to the first part of the fishing trip it is not possible to edit the fish tickets; a process which greatly bolsters the accuracy of catch and effort by statistical area.

The analysts are seeking the CPT's input on:

- 1. The ways in which stock assessment authors currently use spatially differentiated catch, effort and CPUE information (or how this information may be important in the future)**

- 2. The potential impacts of lower quality information on catch, effort, and CPUE by stat area on crab research and stock assessments (Is there a threshold where this becomes really problematic? I.e., what if this only happens a few times a year?)**

CPT could provide this feedback directly to analysts and in the CPT report. If the CPT wishes to take a stronger stance on this issue, the group could provide more formal recommendations through the CPT report.