



September 30, 2022

Mr. Simon Kinneen, Chairman
North Pacific Fishery Management Council
1007 West Third,
Suite 400 Anchorage, AK 99501

RE: Comment on Agenda Item C3 Trawl EM Analysis – Final Action

Dear Chairman Kinneen and Council Members:

The Alaska Bering Sea Crabbers (ABSC) is a trade association representing 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 opportunity to comment on Agenda Item C3 – Final Action on Trawl Electronic Monitoring (EM) Analysis.

As three of Alaska’s most valuable crab stocks are suffering from historically low levels of abundance, ABSC urges the Council and Management to closely monitor and account for all crab removals from the Bering Sea. This includes incidental catch across all sectors. We understand the Trawl EM program is designed to use EM for compliance monitoring, meaning that EM video does not directly feed into catch accounting or stock assessments. Instead, catch accounting uses industry reported data (verified through EM) and data collected by shoreside observers. The analysis states on page 11 that *alternatives 2 and 3 would likely increase accountability of PSC. EM systems would be used to verify compliance with retention requirements, allowing for PSC data to be collected during offload. And that data from all PSC species will be collected during offload of trips by shoreside observers.* However, as it pertains to crab, page 76 of the analysis lays out guidelines for Trawl EM trips where there is a shoreside observer monitoring the offload, *for the observer to collect information on the amount of salmon and halibut PSC during the offload.* Yet information on other PSC, including crab, would come from the eLandings report. In other words, crab would then be left for the plant personnel to sort out to species and the observers in the plant will provide some “spot check” verification. Crab are lumped in the same category with herring, squid, lumpsuckers, and jellyfish (Table 3-7).

The depleted status of Alaska’s crab stocks demands that managers and the catch accounting system collect crab PSC information at the highest resolution that’s available. That includes “clinger crab” that are stuck to the large meshes on a pollock net and fall to the deck during the haul back, and also accounting for all crab in an offload to the correct species level. ABSC is concerned that cameras onboard these vessels will not be able to identify crab by species if there is a discard event at sea, with similar concerns if crab sorting and identification at the plant is not monitored by a NMFS trained plant observer. King, snow, Tanner and snow-Tanner hybrids are all subject to capture in these fisheries and the correct identification of such is crucial for management of these stocks, especially while they remain at such low levels of abundance with some designated as overfished.

In summary, ABSC is in support of Alternative 2 for the use of EM on pollock catcher vessels but have concerns regarding the level of uncertainty cameras will have with the detection and identification of

crab PSC on deck and in the event of at-sea discards. Additionally, we would like to see crab PSC accounting have the same priority of shoreside sampling as salmon and halibut where offload retention counts are collected by the observer in processing plant and not subject to “spot check” verification of proper plant sorting.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Goen', with a stylized flourish at the end.

Jamie Goen
Executive Director
Alaska Bering Sea Crabbers
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