

March 27, 2018

Mr. Dan Hull, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

RE: April 2018 agenda item: BSAI Crab Cooperative Reports

Dear Chairman Hull:

During the February 2013 meeting, the Council passed the following motion:

The Council requests that each of the BSAI crab rationalization cooperatives voluntarily provide an annual report detailing measures the cooperative is taking to facilitate the transfer of quota share to active participants, including crew members and vessel owners, and available measures which affect high lease rates and crew compensation. The annual reports should convey to the Council the effectiveness of the measures implemented through the cooperatives and the estimated level of member participation in any voluntary measures and include supporting information and data. These reports are requested to be delivered for the October meeting each year.

Trident Affiliated Crab Harvesting Corporation, a crab harvesting cooperative was formed under 50 C.F.R. § 680.21, submits the following report for the April 2018 Council meeting:

Trident Affiliated Crab Harvesting Corporation is a smaller affiliated crab cooperative with 27 member entities this year, including one CDQ group, that hold Bering Sea crab IFQ. Our Coop is made up of eight member vessels, all of which are participating in the BSAI crab fisheries.

The following report answers the seven questions derived from the Council's February 2013 motion concerning measures crab harvesting cooperatives are taking or have taken to facilitate the transfer of QS to active participants, including crew members and vessel owners, and the available measures taken to address high lease rates and crew compensation.

1. *What measures is the cooperative taking to facilitate the transfer of quota share to active participants, including crew-members and vessel owners?*

The purpose of establishing the Trident Affiliated Crab Harvesting Corporation was not to provide its members with a mechanism for consolidation. It was established by Trident Seafoods Corporation merely for the purpose providing greater flexibility in the company's fishing plan, not to retire vessels. Other independent vessel owners asked to join because they also wanted additional flexibility and the managers of those vessels were comfortable being members of an affiliated cooperative with Trident. Every vessel that entered the cooperative basically catches the quota it brings into the Cooperative.

There are no specific measures that the Trident Affiliated Crab Harvesting Cooperative has taken to ensure active participation, but consolidation is not the purpose of the cooperative. As a result, all of the vessels that

are in the Cooperative actively fish. Members of the Cooperative do not routinely transfer or lease quota share to "outside" cooperatives or vessels. Thus, all eight of the cooperative vessels remain active in the crab fisheries.

2. What is the level of participation from Cooperative members regarding these measures?

Our Coop members, as active participants and vessel owners harvest their own quota shares. All of the eight member vessels actively fish crab.

3. How effective have these measures been?

The Trident Affiliated Crab Harvesting Corporation's member entities have been harvesting their own quota share since the inception of the Cooperative. There is one member vessel that leased their quota shares early in the crab rationalization program, and then decided to stop leasing its quota and return to active participation in the BSAI crab fisheries. That member vessel has remained an active participant.

4. What measures is the cooperative utilizing to address the issue of high lease rates, as they affect crew compensation.

Our Cooperative members and vessel owners own their quota shares. The Cooperative managers are aware of some intra-coop leases at below market rates between member vessels and this has mitigated the issue of high lease rates impacting crew compensation.

5. What is the level of participation from cooperative members regarding these measures?

Our entire Coop membership participates in the practices outlined above as they all own their own crab.

6. How effective have these measures been?

Because member vessels do not rely on leased crab, these measures seem effective.

7. What future measures does the cooperative plan to take to address the Council concerns over active participation and lease rates as they effect crew compensation?

Because the purpose of the Trident Affiliated Crab Harvesting Cooperative was not consolidation, and all of the member's vessels actively fish their own quota, the Cooperative is not anticipating future measures to address consolidation or high lease rate issues.

Sincerely,



Brian S. Parsons
TRIDENT AFFILIATED CRAB HARVESTING CORPORATION