



April 16, 2014

RE: Input on a proposed change to the Tanner crab harvest strategy

To members of the NPFMC Crab Plan Team:

The Alaska Bering Sea Crabbers (ABSC) is a 501(c)(5) non-profit seafood industry trade association representing nearly 70% of the crab harvesters in the Rationalized Bering Sea/Aleutian Islands crab fisheries. As long-time participants in the king and tanner crab fisheries, our members have a significant stake in the long-term health of the Bering Sea ecosystem and are actively concerned with future access to the important crab resources upon which they depend.

Prior to the August 31, 2014 deadline, ABSC intends to submit an Agenda Change Request (ACR) to the Alaska Board of Fisheries (BOF) asking for a change to the current Tanner crab harvest strategy contained in regulation at 5 AAC 35.508(g)(5). In this ACR, Bering Sea commercial crab harvesters will be asking the BOF to adjust the industry-standard exploitable size limit for male Tanner crab in the Eastern Subdistrict (represented as " $C_{E,MSY}$ " in the harvest strategy formula) from 5.5 inches downward to 5.0 inches. Under the current Bering Sea District C. *Bairdi* Tanner Crab Harvest Strategy, $C_{E,MSY}$ means the catch of biomass of male tanner crab in the portion of the Bering Sea District east of 166° W that are 140 millimeters (5.5 inches) or greater in carapace width, including lateral spines, resulting from fishing on the estimated mature male biomass at the estimated mean time of mating at the full-selection F_{MSY} rate (or proxy). To this end, ABSC will be requesting that 5 AAC 35.508(g)(5) be amended to read: " $C_{E,MSY}$ " means the catch biomass of male *C. bairdi* Tanner crab in the portion of the Bering Sea District east of 166° W long., that are **127 millimeters (five inches)** or greater in carapace width, including lateral spines, resulting from fishing on the estimated mature male biomass at the estimated mean time of mating at the full-selection F_{MSY} rate or a proxy for the F_{MSY} rate.

While the commercial fishery had been closed since 2009 at the time the current harvest strategy was adopted in 2011, industry was in support of an exploitable male size limit (self-imposed industry retained size limit) of 5.5 inches. However, recent changes in both the abundance and size-at-abundance of Tanner crab as well as the stock assessment methodology for Tanner crab have made the commercial sector aware of the potential lost yield (from an artificially reduced total allowable catch) realized under the current harvest strategy and definition of $C_{E,MSY}$. Lost yield results in forgone revenue for harvesters, processors, and communities, which was unforeseen at the time the Tanner crab harvest strategy was originally adopted. As can be seen from the analysis conducted by staff at Natural Resources Consultants, Inc. (see attached Technical Memorandum), with assistance from staff at ADF&G and the Alaska Fisheries Science Center, reducing the self-imposed industry retained size limit to 5.0 inches results in a potential increase in total allowable catch (TAC) between 55% and 77%. The harvest sector believes that above regulation change does not negate or diminish the original intent of the current harvest strategy; however, at the time of its adoption, industry did not anticipate fewer male crab achieving the self-imposed retention limit of 5.5 inches in the Eastern Subdistrict. By only changing the industry-standard exploitable size limit component of the C. *Bairdi* Tanner Crab Harvest Strategy, a buffer on the harvest level is maintained between the legal size limit



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(4.8 inches) and the new proposed industry retained size limit in order to avoid overfishing. As with the harvest strategy adopted in 2011, overharvesting of the Tanner crab stock is avoided because the total allowable catch quota is set by a limit on the catch of exploited males. In addition, maintaining an artificial and unattainable high exploitable size limit results in higher at-sea discards, increased handling mortality, and lower CPUE all of which compromise the profitability of the commercial Tanner crab fishery. The commercial crab sector believes that a reduction in the industry-standard retained size limit for Eastern Subdistrict Tanner crab has the benefits of reduced sorting time and reduced discards. Finally, a reduction in the industry retained size limit will lead to improved management of Tanner crab stocks into the future as the key components of the harvest strategy (legal size limit, mature size limit, and exploitable size limit) are all better aligned.

Because the CPT will not meet again prior to the BOF ACR deadline, ABSC is seeking Plan Team input on the proposed harvest strategy change at this time. Broadly speaking, ABSC would like feedback on any concerns the CPT may have with the proposed regulation change, especially as it concerns future TAC levels and the long-term biological integrity of the Tanner crab stock. It should be noted that for the 2013/2014 fishing season, negotiations between representatives from the harvesting and processing sectors took place before the start of the fishing season, which resulted in an informal agreement to both harvest and accept 5.0 inch Tanner crab from the Eastern Subdistrict. ABSC understands that at the time of the May CPT meeting, analysis of the necessary data from the 2013/2014 fishing year has not taken place such that a full analysis on the impacts of how lowering the industry-preferred size standard in the harvest strategy (i.e., population size; size frequency distribution; fishery selectivity; retained-catch selectivity; future recruitment; MSY) has not been done. However, any initial thoughts or concerns the CPT can provide at this time will be greatly appreciated. Thank you for your time and consideration.

Sincerely,

Ruth Christiansen, Science Advisor and Policy Analyst
Alaska Bering Sea Crabbers

Enclosed:

NRC Technical Memorandum

Cc:

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