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Alaska Bering Sea Crabbers
10 / 21 / 2015
RC 029

The following are points of consideration regarding ACRs #1 and #2 submitted by the Alaska Bering Sea Crabbers (ABSC) for deliberation during the October 2015 BOF Work Session.

1. ADF&G does not concur that these ACRs meet the threshold for a fishery conservation purpose or reason. To support this, they primarily cite the fact that the realized incidental retention limit has been negligible historically.
2. As part of their comments, ADF&G does not specifically address the high amount of sorting and discarding that is currently occurring on the water. However, this fact can be deduced in the 'Additional Information' portion of the staff comments to ACR #2, which points out that incidental industry-preferred size snow crab averaged 62% of Tanner crab by weight, yet only 0.04% incidental snow crab (by weight) was actually landed. ABSC emphasized this concern in both ACRs and it is our contention that unnecessarily high levels of sorting and wasteful discarding should always be a fishery conservation concern.
3. The reason the actual realized incidental retention limit is so low is due to the fact that there is no incentive for vessels to retain even up to the current maximum of 5% (by weight). Processors treat any incidental retention as deadloss (regardless of the condition the crab is in) when landed because it is not worth it to them to switch over their lines for such a small amount of a different crab species. If the incidental retention limit were increased, there would be both a greater incentive to retain crab on the vessel (thereby minimizing both sorting and discarding on the water) and an increased reason for processors to process this greater amount of crab as well (thereby reducing deadloss).