Certified Seafood International (CSI)

U.S. Alaska Bering Sea and Aleutian Islands King, Tanner, and Snow Crab Commercial Fisheries

Surveillance Report

Certification Body (CB):	**Global Trust Certification**
Assessment team:	Dr. Ivan Mateo, Lead Assessor Dr. Gerald P. Ennis, Assessor Dr. Wesley Toller, Assessor
Fishery client:	Bering Sea Crab Client Group
Assessment Type:	3rd Surveillance of the second cycle of recertification
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Foreword

The Certified Seafood International (CSI) Certification program is a third-party sustainable seafood certification program for wild capture fisheries owned by the Certified Seafood International (CSI) Inc led by a diverse board of seafood and sustainability industry experts.

The Certified Seafood International (CSI) represents the latest stage in the evolution of the Alaska Responsible Fisheries Management (RFM) Program, which began in 2010 as a credible, ISO-based third-party certification system for sustainable wild-capture fisheries. Developed by the Alaska Seafood Marketing Institute (ASMI), the RFM Program was grounded in the UN FAO Code of Conduct for Responsible Fisheries and Eco-labelling Guidelines and operated under two core standards to ensure responsible practices and traceability.

In 2020, ownership of the RFM Program transitioned to the Certified Seafood Collaborative (CSC), a nonprofit organization focused on expanding the program to include other North American fisheries outside the State of Alaska while improving efficiency and reducing costs. This marked a key step in broadening the program's reach and impact.

In 2025, the program advanced further by transferring its name and assets to Certified Seafood International (CSI), a U.S.-based organization structured as a nonprofit and currently applying for 501(c) nonprofit status. This transition supports the program's global expansion, offering a cost-effective, credible certification option for wild-capture fisheries worldwide and reinforcing its commitment to responsible seafood sourcing on an international scale.

The Certified Seafood International (CSI) Responsible Fisheries Management (RFM) Standard is composed of Conformance Criteria based on the 1995 FAO Code of Conduct for Responsible Fisheries and the FAO Guidelines for the Eco-labelling of Fish and Fishery Products from Marine Capture Fisheries adopted in 2005 and amended/extended in 2009. The CSI RFM Standard also includes full reference to the 2011 FAO Guidelines for the Eco-labelling of Fish and Fishery Products from Inland Fisheries which in turn are now supported by a suite of guidelines and support documents published by the UN FAO. Further information on the CSI program may be found at: https://csicertified.org/.

1. Contents

1.1. List of Figures

No table of figures entries found.

1.2. List of Tables

2. List of Acronyms

Acronym	Complete Name
AAC	Alaska Administrative Code
ABC	Allowable Biological Catch
ACL	Annual Catch Limit
ADFG	Alaska Department of Fish and Game
AFA	American Fisheries Act
AFSC	Alaska Fisheries Science Center
AIGKC	Aleutian Islands Golden King Crab
ASMI	Alaska Seafood Marketing Institute
AWT	Alaska Wildlife Troopers
BBRKC	Bristol Bay Red King Crab
BOF	Board of Fisheries
BSAI	Bering Sea and Aleutian Islands
BSFRF	Bering Sea Fisheries Research Foundation
CCRF	Code of Conduct for Responsible Fisheries
CCTF	Climate Change Task Force
CDQ	Community Development Quota
CFEC	Commercial Fisheries Entry Commission
CFR	Code of Federal Regulations
CPT	Crab Plan Team
CPUE	Catch per Unit Effort
CR	Crab Rationalization
CSI	Certified Seafood International
CSC	Certified Seafood Collaborative
EBFM	Ecosystem-Based Fisheries Management
EIS	Environmental Impact Statement
EEZ	Exclusive Economic Zone
EFH	Essential Fish Habitat
ESA	Endangered Species Act
ESP	Ecosystem and Socioeconomic Profile
ETP	Endangered, Threatened and Protected
FAO	Food and Agriculture Organization of the United Nations
FEP	Fishery Ecosystem Plan
FMP	Fishery Management Plan
GOA	Gulf of Alaska
GHL	Guideline Harvest Level
HAPC	Habitat Area of Particular Concern
IFQ	Individual Fishing Quota
IPHC	International Pacific Halibut Commission
IRFA	Initial Regulatory Flexibility Analysis
IRIU	Improved Retention/Improved Utilization
LLP	License Limitation Program
MCS	Monitoring, Control and Surveillance
MMB	Mature Male Biomass
MMPA	Marine Mammal Protection Act

Acronym	Complete Name
MSA	Magnuson-Stevens Fisheries Management and Conservation Act
MSE	Management Strategy Evaluation
MSST	Minimum Stock Size Threshold
mt	Metric tons
MSY	Maximum Sustainable Yield
NC	Non-conformity
NEPA	National Environmental Policy Act
nm	Nautical miles
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NOV	Notice of Violation
NPFMC	North Pacific Fishery Management Council
OFL	Overfishing Level
OLE	Office for Law Enforcement
OY	Optimum Yield
PSC	Prohibited Species Catch
RACE	Resource Assessment and Conservation Engineering
REFM	Resource Ecology and Fisheries Management
RFM	Responsible Fisheries Management
SAFE	Stock Assessment and Fishery Evaluation (Report)
SMBKC	St. Matthew (Island) Blue King Crab
SSC	Scientific and Statistical Committee
SSL	Steller Sea Lion
TAC	Total Allowable Catch
UFM	Unobserved Fishing Mortality
UOC	Unit of Certification
USCG	U.S. Coast Guard
USFWS	U.S. Fish and Wildlife Service

3. Executive Summary

3.1. Brief intro and description of surveillance process.

This surveillance report documents the 3rd surveillance assessment of the second cycle of recertification for the U.S. Alaska Bering Sea and Aleutian Islands King and Snow crab commercial fisheries originally certified on April 16th, 2012, and the Eastern Bering Sea Tanner Crab and Aleutian Islands Golden King Crab fisheries that were certified on December 7th, 2017, and presents the recommendation of the Assessment Team for continued CSI Certification.

Unit of Certification

The U.S. Alaska Bering Sea and Aleutian Islands King, Tanner, and Snow crab commercial fisheries [Bristol Bay Red King crab (*Paralithodes camtschaticus*), St. Matthew Island Blue King crab (Paralithodes platypus), Eastern Bering Sea Tanner Crab (*Chionoecetes bairdi*), Aleutian Islands Golden King Crab (*Lithodes aequispinus*), and Eastern Bering Sea Snow crab (*Chionoecetes opilio*)] legally employing pot gear within Alaska jurisdiction (200 nautical miles EEZ) and subject to a federal [National Marine Fisheries Service (NMFS)/North Pacific Fishery Management Council (NPFMC)] and state [Alaska Department of Fish and Game (ADFG) & Board of Fisheries (BOF)] joint management regime. The UoCs are as described in Table 3.

This surveillance report documents the assessment results for the continued certification of the above fisheries to the CSI Certification Program. This is a voluntary program that has been supported by ASMI previously and now by Certified Seafood International (CSI) who wish to provide an independent, third-party certification that can be used to verify that these fisheries are responsibly managed.

The assessment was conducted according to the Global Trust procedures for CSI Certification using the fundamental clauses of the CSI RFM Fisheries Standard Version 2.2 (October, 2024) in accordance with ISO 17065 accredited certification procedures.

The assessment is based on 4 major components of responsible management derived from the FAO Code of Conduct for Responsible Fisheries (1995) and Guidelines for the Eco-labelling of products from marine capture fisheries (2009); including:

Section A. The Fisheries Management System
Section B. Science and Stock Assessment Activities and The Precautionary Approach
Section C. Management Measures and Implementation, Monitoring and Control
Section D. Serious Impacts of the Fishery on the Ecosystem

These four major components are supported by 12 fundamental clauses (+ 1 in case of enhanced fisheries) that guide the CSI Certification Program surveillance assessment.

The surveillance process included a desktop review of relevant new documentary information including but not limited to: the most current fishery assessment and stock evaluation reports; Crab Plan Team reports and meeting minutes; Council publications; relevant scientific publications; ecosystem status reports; fishery management plans and amendments thereof; changes to state and federal regulations; fishery enforcement statistics; environmental impact statements; marine mammal stock assessments; and strategic plans (see Section 10 - References for a more complete listing of documents reviewed).

The surveillance process also included substantive meetings with representatives from each of the key fishery management agencies charged with management of the BSAI King, Tanner and Snow Crab commercial fisheries.

Assessment team meetings included: North Pacific Fishery Management Council (NPFMC); Alaska Department of Fish & Game (ADFG); Alaska Fisheries Science Center-Seattle (AKFSC); and NOAA National Marine Fisheries Alaska Regional Office (NOAA AK Regional Office). The assessment team also met with Bering Sea Crabbers Association and with the Bering Sea Crab Client Group (BSCCR) – fishery client and certificate holder. All meetings were held remotely via videoconferencing.

As described more fully in the following report sections, the assessment team did note some minor changes to the fishery management system. However, none of these changes were seen to undermine continued compliance of the fishery management system for BSAI King, Tanner and Snow Crab commercial fisheries with requirements of the CSI RFM Standard. Progress in addressing non-conformities, as judged against defined milestones in client action plans, was judged to be adequate and on target.

A summary of the site meetings is presented in Section 6. Assessors included both externally contracted fishery experts and Global Trust internal staff

3.2. Summary of main findings

The Audit team has determined that the AK BSAI Crab commercial fishery operated within the defined Alaskan UoC remained in compliance with the CSI RFM Fishery Standard Version 2.2's Fundamental Clauses for the Fisheries Management System component (Clauses 1, 2, 3), Science and Stock Assessment Activities and The Precautionary Approach (Clauses 4, 5, 6, 7), Management Measures and Implementation Monitoring and Control component (Clauses 8, 9, 10, 11), and Ecosystem Impact (Clause 12).

3.3. Recommendation with respect to continuing Certification.

Following this 3rd Surveillance Assessment of the second recertification cycle, the assessment team recommends that continued certification under the Certified Seafood International Certification Program is maintained for the management system of the applicant fisheries, the U.S. Alaska Bering Sea and Aleutian Islands King, Tanner, and Snow crab commercial fisheries [Bristol Bay Red King crab (*Paralithodes camtschaticus*), St. Matthew Island Blue King crab (*Paralithodes platypus*), Eastern Bering Sea Tanner Crab (*Chionoecetes bairdi*), Aleutian Islands Golden King Crab (*Lithodes aequispinus*), and Eastern Bering Sea Snow crab (*Chionoecetes opilio*)] legally employing pot gear within Alaska jurisdiction (200 nautical miles EEZ) and subject to a federal [National Marine Fisheries Service (NMFS)/North Pacific Fishery Management Council (NPFMC)] and state [Alaska Department of Fish and Game (ADFG) & Board of Fisheries (BOF)] joint management regime.

3.4. Assessment Team Details

The Assessment Team for this assessment was as follows; further details are provided in Appendix 1):

- Dr. Ivan Mateo – Lead Assessor, responsible for RFM Fundamental Clauses 1, 2, 3, 9, 10, and 11.
- Dr. Gerald P. Ennis – Assessor 1, responsible for RFM Fundamental Clauses 4, 5, 6, 7, and 8.
- Dr. Wesley Toller – Assessor 2, responsible for RFM Fundamental Clause 12.

3.5. Details of Applicable CSI Documents

This assessment was conducted according to the relevant program documents outlined in Table 1 below.

Table 1. Relevant CSI program documents including applicable versions.

Document title	Version number, Issue Date	Usage
CSI Procedure 2: Application to Certification Procedures for the CSI Fishery Standard	Version 6.3 April,2025	Process
Certified Seafood International RFM Fisheries Standard	Version 2.2 October, 2024	Standard
Certified Seafood International Certification Program Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries	Version 2.2, October, 2024	Guidance to Standard

4. Client contact details

Table 2. Client details and key contact information.

Applicant Information		
Organization/Company Name:		Bering Sea Crab Client Group
Address:	Street:	23929 22nd Drive SE, Bothell
	City:	Seattle
	State:	Washington
	Country:	USA
	Zip code	98199
Applicant Key Contact Information		
Name:		Scott Goodman
Position:		General Manager
E-mail:		sgoodman@nrccorp.com

5. Unit(s) of Certification

5.1. Unit(s) of Certification

The Units of Certification (i.e., what is covered by the certificate) are as described in Table 3 below.

Table 3. Units of Certification.

Unit of Certification 1 of 5		
Species:	Common name:	Red King crab
	Latin name:	*Paralithodes camtschaticus*
Stock(s):		Bristol Bay Red King crab
Geographical area:		U.S. Federal and State waters off the U.S. State of Alaska
Fishing gear/method:		Baited pot/trap gears
Client group:		Bering Sea Crab Client Group LLC
Unit of Certification 2 of 5		
Species:	Common name:	Snow crab
	Latin name:	*Chionoecetes opilio*
Stock(s):		Eastern Bering Sea Snow crab
Geographical area:		U.S. Federal and State waters off the U.S. State of Alaska
Fishing gear/method:		Baited pot/trap gears
Client group:		Bering Sea Crab Client Group LLC
Unit of Certification 3 of 5		
Species:	Common name:	Blue King crab
	Latin name:	*Paralithodes platypus*
Stock(s):		St. Matthew Island Blue King crab
Geographical area:		U.S. Federal and State waters off the U.S. State of Alaska
Fishing gear/method:		Baited pot/trap gears
Client group:		Bering Sea Crab Client Group LLC
Unit of Certification 4 of 5		
Species:	Common name:	Tanner crab
	Latin name:	*Chionoecetes bairdi*
Stock(s):		Eastern Bering Sea Tanner crab
Geographical area:		U.S. Federal and State waters off the U.S. State of Alaska
Fishing gear/method:		Baited pot/trap gears
Client group:		Bering Sea Crab Client Group LLC
Unit of Certification 5 of 5		
Species:	Common name:	Golden King crab
	Latin name:	*Lithodes aequispinus*
Stock(s):		Aleutian Islands Golden King crab
Geographical area:		U.S. Federal and State waters off the U.S. State of Alaska
Fishing gear/method:		Baited pot/trap gears
Client group:		Bering Sea Crab Client Group LLC
Management system: (all Units of Certification)		U.S. Federal and State fisheries within the Gulf of Alaska and the Bering Sea & Aleutian Islands managed by: - National Marine Fisheries Service (NMFS) - North Pacific Fishery Management Council (NPFMC) - Alaska Department of Fish and Game (ADFG) - Alaska Board of Fisheries (BOF)

5.2. Changes to the Unit(s) of Certification (if any)

There have not been any changes to the Units of Certification

6. Summary of site visits and/or consultation meetings

Desktop reviews are the preferred assessment vehicle within the CSI program. In general, on-site/off-site audits are required only if the Certification Body deems that a desktop review may be inadequate for determining whether the fishery is continuing to comply with the CSI RFM Fishery Standard, based on the performance of the fishery, status of non-conformances and related corrective actions. Table 4 shows a summary of all remote site visits and consultation meetings

Table 4. Summary of site visits and/or consultation meetings.

Meeting Date and Location	Personnel	Areas of discussion
Date: 12/4/2025 12:00 PM - 1:00 PM Location: Remote	Bering Sea Crab Client Group: Scott Goodman Assessment Team Members: Dr. Ivan Mateo, Lead Assessor Dr. Jerry Ennis, Assessor Dr. Wes Toller, Assessor	Topics Discussed: ▪ Changes to management measures for crab stocks. ▪ Regulatory or policy changes affecting the management of crab stocks or fishing operations. ▪ Updates on the status of crab stocks. ▪ Rebuilding prospects for SMBKC, BBRKC and EBSSC. ▪ Long-term outlook for change in underlying environmental/ecological factors that favor rebuilding. ▪ Update on trends for lost fishing gear and use of bait. ▪ Status update for CAP for NC#1 – SMBKC. ▪ Status update for CAP for NC#2– EBSSC ▪ Status update for CAP for NC#3 – AIGKC habitat.
Date: 12/4/2025 1:00 PM - 2:30 PM Location: Remote	Alaska Department of Fish and Game: Forrest Bowers, Ethan Nichols, Katie Palof Ben Daly Mark Stichert Assessment Team Members: Dr. Ivan Mateo, Lead Assessor Dr. Jerry Ennis, Assessor Dr. Wes Toller, Assessor	Topics Discussed: ▪ Changes to management measures for crab stocks. ▪ Regulatory or policy changes affecting the management of crab stocks or fishing operations. ▪ Changes in decision-making processes for crab fisheries. ▪ Updates on the status of crab stocks. ▪ Rebuilding prospects for SMBKC, BBRKC and EBSSC ▪ Long-term outlook for change in underlying environmental/ecological factors that favor rebuilding. ▪ Changes in crab fishery effects on the ecosystem. ▪ Impact of climate change on crab stocks. ▪ Fishery interactions with non-target species, seabirds, ETP species, habitats, and the food web. ▪ Update on trends for lost fishing gear and use of bait. ▪ New info on habitats or from AI habitat surveys
Date: 12/10/2025 1:00 PM - 2:30 PM Location: Remote	NOAA Alaska Regional Office: Andrew Olson, Krista Milani, Molly Zaleski Assessment Team Members: Dr. Ivan Mateo, Lead Assessor Dr. Jerry Ennis, Assessor	Topics Discussed: ▪ Changes to management measures for crab stocks. ▪ Regulatory or policy changes affecting the management of crab stocks or fishing operations. ▪ Changes in decision-making processes for crab fisheries. ▪ Long-term outlook for change in underlying environmental/ecological factors that favor rebuilding.

	Dr. Wes Toller, Assessor	▪ Fishery interactions with non-target species, seabirds, ETP species, habitats, and the food web. ▪ New info on habitats or from AI habitat surveys. ▪
12/11/2025 1:00 PM - 2:30 PM	Alaska Fisheries Science Center: William Stockhausen, Cody Szuwalski, Melissa Haltauch Grant Adams Assessment Team Members: Dr. Ivan Mateo, Lead Assessor Dr. Jerry Ennis, Assessor Dr. Wes Toller, Assessor	Topics Discussed: ▪ Regulatory or policy changes affecting the management of crab stocks or fishing operations. ▪ Updates on the status of snow and tanner crab stocks. ▪ Long-term outlook for change in underlying environmental/ecological factors that favor rebuilding. ▪ Resilience of small snow crab to marine heat waves. ▪ Use of ecosystem information in stock assessments. ▪ Introduction of risk tables for setting buffers. ▪ Changes in crab fishery effects on the ecosystem. ▪ Impact of climate change on crab stocks. ▪ EBSSC mass mortality.
Date: 12/12/2025 5:30 PM - 7:00 PM Location: Remote	Alaska Bering Sea Crabbers Cory Lescher Bering Sea Crab Client Group: Scott Goodman Assessment Team Members: Dr. Ivan Mateo, Lead Assessor Dr. Jerry Ennis, Assessor Dr. Wes Toller, Assessor	▪ Topics Discussed: ▪ Discussion of a new or emerging Alaska state managed golden king crab fishery. ▪ Halibut retention incident ▪ Outstanding nonconformance on impacts of AIGKC fishery on sensitive benthic habitats (e.g. Corals, Sponges)
Date: 12/16/2025 12:00 PM - 2:00 PM Location: Remote (video call)	North Pacific Fishery Management Council: Diana Evans Anita Kroska, Taylor Homan, Diana Stram Sarah Marrinan Assessment Team Members: Dr. Ivan Mateo, Lead Assessor Dr. Jerry Ennis, Assessor Dr. Wes Toller, Assessor	Topics Discussed: ▪ Significant changes or updates to the crab FMP. ▪ Challenges confronting the Crab Plan Team. ▪ Updates on the status of crab stocks. ▪ Rebuilding prospects for SMBKC, BBRKC and EBSSC ▪ Long-term outlook for change in underlying environmental/ecological factors that favor rebuilding. ▪ SAFE report for AIGKC, 2023. ▪ Changes in crab fishery effects on the ecosystem ▪ EBFM and impact of climate change on crab stocks ▪ Status of EFH five-year review. ▪ Unobserved fishing mortality (UFM).
Date: 12/18/2025 1:00 PM – 2:30 PM Location: Remote	Bering Sea Crab Client Group: Scott Goodman Assessment Team Members: Dr. Ivan Mateo, Lead Assessor Dr. Jerry Ennis, Assessor Dr. Wes Toller, Assessor	Topics Discussed: ▪ Findings from the surveillance audit ▪ Progress against corrective action plans ▪ Updates to corrective action plans ▪ Timeline for completion of surveillance report

7. Summary findings

Surveillance audits are summary audits intended to evaluate continued compliance with the CSI RFM Fishery Standard. Each aspect of the fishery they are intended to focus on is addressed below.

7.1. Update on topics that trigger immediate failure

The following fisheries management issues cause a fishery to immediately fail CSI assessment:

- Dynamiting, poisoning, and other comparable destructive fishing practices.
- Significant illegal, unreported, and unregulated (IUU) fishing activities in the country jurisdiction.
- Shark finning.
- Slavery and slave labor on board fishing vessels.
- Any significant lack of compliance with the requirements of an international fisheries agreement to which the U.S. is signatory. A fishery will have to be formally cited by the International Governing body that has competence with the international Treaty in question, and that the US has been notified of that citation of non-compliance.

The Assessment Team has, as part of this surveillance, carried out a review of any new evidence with respect to these issues and found no evidence that any of the above issues are occurring/describe any issues identified and the consequences for the fishery.

7.2. Changes in the management regime and processes

The most material 2025 change with potential to alter impacts on resources was the EBS snow crab management response to unprecedented hybrid *Chionoecetes* abundance, including creation of a defined hybrid target area and an associated TAC adjustment to incentivize hybrid harvest (ADF&G, 2025c). In addition, the EBS snow crab directed TAC for 2025/26 materially increased to 9.30 million lb (ADF&G, 2025c; ADF&G, 2025f), which could increase overall fishing activity/footprint relative to the prior season. A key management-process change occurred in December 2025 when the Council took final action on CR Program arbitration reforms (NPFMC, 2025a; NPFMC, 2025b), and NMFS implemented an administrative change to the BBRKC capacity reduction fee rate (NMFS, 2025a).

7.3. Changes to the organizational responsibility of the main management agencies

No evidence was identified of permanent changes in the statutory mandates or jurisdictional allocation of responsibilities among the principal management agencies that comprise the BSAI crab fishery management framework during calendar year 2025. However, material temporary changes occurred in the ability of key agencies to discharge routine responsibilities and in how certain responsibilities were executed and documented. NMFS Alaska Region reported that a federal government shutdown furloughed most Alaska Region personnel from October 1 through November 12, 2025, constraining normal service delivery; NMFS nonetheless maintained "excepted" critical functions including monitoring and managing fisheries to avoid exceeding catch limits and issuing quota so Bering Sea crab fisheries could open, indicating a temporary capacity shift rather than a mandate change (NMFS, 2025a). In the same period, NMFS reported it could not conduct a Tribal engagement session prior to the December 2025 Council meeting due to the shutdown, reflecting a temporary disruption to engagement/consultation process delivery within the management framework (NMFS, 2025a). NOAA OLE Alaska Division likewise reported that shutdown conditions resulted in a less in-depth FY2025 Council report and a change

in reporting structure, noting that enforcement "Case Updates" previously included with the OLE Council report were provided instead under a separate NOAA General Counsel report agenda item, representing a change in the packaging/presentation of enforcement responsibilities and associated transparency mechanisms (NOAA OLE, 2025a). Finally, the Council's October 2025 meeting recap documents a process-level reprioritization of Council work in response to Executive Order 14276, including initiating additional items and emphasizing continued support for core surveys, fisheries-dependent data collection, monitoring, and NOAA capacity to support agency functions, which may influence interagency tasking and focus but does not alter underlying legal responsibilities (NPFMC, 2025a).

7.4. New information on the status of stock

7.4.1 Eastern Bering Sea Snow Crab

Total allowable catches were reduced with the collapse of the population in 2021. The fishery was closed in 2022 and the closure continued through 2023. Discard mortality from the directed fishery is the next largest source of mortality after retained catch and approximately tracks the retained catch. Discard mortality in 2024 was 0.66 kt. The fishery reopened for the 2024/25 season with a retained catch in the directed fishery of 2.1 kt. Non-directed crab and groundfish fisheries resulted in a bycatch mortality of 0.09 kt. Because the total catch mortality for the stock was below the 2024/25 OFL of 19.6 kt, overfishing did not occur. [1]

Recently, MMB was increasing as a large recruitment event moved through the size classes, but that recruitment has since disappeared, and the observed MMB reached an all-time low (15.69 kt) in the 2023 survey. The 2024 survey estimate of MMB increased to 23.49 kt, the third-lowest value in the time series. The 2025 survey estimate of MMB was 33.17 kt, the highest value since 2019. [2]

The abundance of industry-preferred males (> 101 mm CW) in the survey increased 30% from 2024 but remains near the time-series low; the nine most recent survey estimates are the nine lowest estimates for the abundance of industry-preferred males. Mature female abundance in 2025 increased 175% from 2024 and is currently near the time-series average following precipitous declines in recent years. Immature female abundance continued to be very high in 2025 and small male (<95 mm) abundance is trending upwards. Overall, there are positive signs for the trajectory of the snow crab population based on the 2025 survey results. Of note is the continued trend of unusually high abundance of large immature females in the population. However, there has been a decreasing trend in the proportion of snow crab males that make the terminal molt to maturity at the industry-preferred size and in 2025 only 4% matured at this size. Because of the terminal molt, individuals maturing at small sizes will never grow large enough to be targeted by the fishery.

There was an unprecedentedly high abundance of hybrid Chionoecetes for all size-sex categories in the 2025 survey with 20% of all Chionoecetes males ≥101 mm captured in the survey being hybrids (see note at end of the tanner crab section). Historically, spikes in hybrid abundance in the survey have not corresponded to spikes in the incidence of hybrids in the snow crab fishery. In last year's snow crab fishery, 1.85% of the retained catch

[1] BSAI Crab Introduction Oct 2025
[2] BSAI EASTERN SNOW CRAB SAFE 2025

was hybrids, based on observer and dockside retained catch sampling. The post-rationalization average is 1.76%. The peak retained catch was 8.23% in the 2017/18 fishery. However, it was noted that the 2025 survey estimate for hybrid abundance was well outside the range of previous observations, which may mean that historical patterns have limited utility for understanding the current situation.

It was recognized at the outset of a long discussion concerning the appropriate definition of male maturity for use with this stock that the SSC had requested the status quo morphometric definition be retained until new information is available that might support a change to the ≥ 95 mm definition. Nevertheless, there emerged a strong consensus by the CPT[3] that the best available scientific information supports the conclusion that the status quo definition is not appropriate in terms of conserving the reproductive potential for the stock, or in terms of supporting optimal yield of commercial-sized animals for harvest. Therefore, the CPT again recommended a change to the definition of maturity for this stock from morphometric maturity to ≥ 95 mm CW. The CPT also supported the author-recommended 20% ABC buffer, OFL of 3.26 kt and ABC of 2.6 kt. However, the SSC considered convergence problems with the Tier 3 model used to be severe enough to prevent its use for harvest recommendations and recommends the Tier 4 approach using mature male biomass as a fallback until the Tier 3 model's convergence and identifiability are clearly improved. SSC considers using REMA-smoothed survey biomass with natural mortality as the F_{MSY} proxy yields transparent and reproducible advice and requested the assessment author provide the OFL using the Tier 4 harvest control rules during the meeting. The SSC intends this to be a temporary approach until an acceptable Tier 3 model can be developed. [4]

Based on the Tier 4 assessment, overfishing is not occurring, however, the stock in 2024/2025 is estimated to be 42% of the B_{MSY}, below the minimum stock size threshold, resulting in an overfished status and snow crab will remain under a rebuilding plan until the stock has rebuilt to the B_{MSY} level. Projected stock size for 2025/2026 is 74% of B_{MSY}. The Tier 4 2025/2026 OFL is 20.11 kt and the 40% recommended buffer resulted in an ABC of 12.07 kt. The ABC decision-making process was informed by a Risk Table and Ecosystem and Socioeconomic Profile (ESP) which were appended to the 2025 snow crab SAFE assessment report.

ADF&G recommended a base 2025/2026 snow crab TAC of 8.3 million pounds (3,765 t). Due to the unprecedented high abundance of hybrid Chionoecetes crab in the 2025 NMFS trawl survey, ADF&G increased the base snow crab TAC by an additional 1 million pounds (454 t) to allow vessels to specifically target hybrid Chionoecetes crab. In coordination with the Bering Sea crab industry, ADF&G expects that vessels target 1 million pounds or 11% of total 9.3-million-pound Bering Sea District snow crab TAC in the portion of the Bering Sea District with the highest survey abundance of hybrid Chionoecetes crab. [5]

7.4.2 Saint Matthew Island Blue King Crab

Retained catches in the most recent directed fisheries were 140 t in 2014/15 and 48 t in 2015/16. The fishery has remained closed since 2016/17.

The SMBKC stock is on a biennial assessment cycle and was last assessed in 2024. In that assessment it was estimated that mature male biomass in 2023/24 was below the MSST, indicating that the stock remains

[3] Sept 2025 CPT Report
[4] Oct 2025 SSC Report Final
[5] ADF&G Advisory Announcement (10/6/2025) 1741176837.pdf

overfished. Estimated total bycatch has remained well below the overfishing level (OFL), hence overfishing has not occurred (BSAI Crab SAFE Intro; link provided in section 7.4.1). [6]

Catches in the 2025 survey showed a continued stable low abundance of both mature and legal male abundance. Immature female abundance was relatively high, with the 2025 survey abundance estimate the highest since the 1990s. However, 74% of the immature females were caught in a single station, and therefore, the precision of the abundance estimate is low (CPT report; link provided in section 7.4.1).

MMB/MMB_{MSY} has increased from 0.31 (2019/20) to 0.47 (2023/24) and was projected to be 0.52, just above the MSST, for 2024/25. The projected MMB estimated for 2024/25 was 1,530 t, the F_{MSY} proxy is the natural mortality rate (0.23 year-1), and the F_{OFL} is 0.108, resulting in a mature male biomass OFL of 129 t. The author recommended and the CPT concurred with a 25% buffer on the OFL resulting in an ABC of 97 t. The CPT recommended the same OFL and ABC for 2025/2026.

The 2025 raw survey and model-based estimates of mature male abundance remain below the state harvest strategy threshold for a fishery opening. Therefore, the Saint Matthew Island blue king crab fishery will remain closed for the 2025/26 season. [7]

7.4.3 Bristol Bay Red King Crab

The directed fishery for Bristol Bay red king crab was open for a second year in 2024/25, following two years of closures, with a retained catch of 1.05 kt. Non-directed crab and groundfish fisheries resulted in a bycatch mortality of 1.20 kt (with handling mortality rates applied). Because the total catch mortality for this stock was below the 2024/25 OFL of 5.02 kt, overfishing did not occur (BSAI Crab SAFE Intro; link provided in section 7.4.1). [8]

In 2025, mature male and female Bristol Bay red king crab were more broadly distributed than in the previous four years, with survey catches for mature females in particular being less concentrated in the southern portion of the survey grid along the Alaska Peninsula. Legal male distribution in 2025 continued the trend seen in recent years of broad distribution across the eastern portion of the Bristol Bay survey area. Relative to 2024 survey results, mature female abundance increased 28%, legal male abundance decreased 7%, and immature male and female abundance were relatively unchanged. Despite positive trends in distribution and abundance, overall BBRKC abundance remains near historic lows in 2025 and there continues to be no substantial recruitment since the early to mid-2000s (CPT report; link provided in section 7.4.1).

Based on model 24.0c.2, the MMB at the time of mating is estimated to have been highest in the late 1970s, with secondary peaks in 1989 and 2002-2003, followed by a gradual decline. The estimated MMB at time of mating in 2024/25 was 19.74 kt. The projection for MMB at the 2025/26 time of mating, which assumes the fishing mortality in 2025/26 matches that corresponding to the OFL, is 16.84 kt which is 91% of B_{MSY}. Estimates of recruitment since 1985 have been generally low relative to those estimated for the period prior to 1985 with intermittent peaks in 1995, 2002, and 2005. The estimate for 2025 was one of the smallest on record, but it is highly uncertain because it is based only on 2025 NMFS EBS survey data.

[6] SMBKC SAFE 2024
[7] ADF&G Advisory Announcement (10/6/2025) 1741274232.pdf
[8] BBRKC SAFE 2024

The SSC supports the author and CPT recommendation to use Model 24.0c2 for harvest specification and the resulting OFL of 5.85 kt, placing the BBRKC stock in Tier 3b. The stock is not overfished and total catch mortality did not exceed the 2024/25 OFL so overfishing did not occur in 2024/25. Even with recent low recruitment, the BBRKC stock is not approaching an overfished condition. The ABC decision-making process was informed by a Risk Table which was appended to the 2025 BB red king crab SAFE assessment report. The SSC supports the author and CPT's recommended ABC buffer of 20%, based on continued uncertainty due to retrospective patterns, effects of cold pool distributional shifts, and lack of fit to recent NMFS female survey biomass which results in a 2025/26 ABC of 4.68 kt (SSC report; link provided in section 7.4.1).

The 2025 estimates of mature female red king crab biomass and effective spawning biomass are above both thresholds required to open the fishery in Area T – Bristol Bay. The 2025/26 TAC for Bristol Bay red king crab is 1,216 t. [9]

7.4.4 Eastern Bering Sea Tanner Crab

Although separate TACs are set for directed fisheries east and west of 166°W longitude, a single OFL is set for tanner crab in the EBS. Retained catch was 2,049 t west of 166°W longitude, and 803 t east of 166°W longitude during the 2024/25 season. Non-directed crab and groundfish fisheries resulted in a bycatch mortality of 3.09 kt (with handling mortality rates applied). Because the total catch mortality for this stock was below the 2024/25 OFL of 41.29 kt, overfishing did not occur (BSAI Crab SAFE Intro; link provided in section 7.4.1). [10]

Eastern Bering Sea tanner crab survey abundance varies in the eastern and western regions, with a shift of the population northwest in 2025 compared to the historical range. Tanner crab abundance in the eastern management area (east of 166° W longitude) decreased in 2025, with mature females down 10% and industry preferred males (≥125 mm) down 28% from 2024. The abundances of small males and immature females in the eastern area were low in 2025. In contrast, the western management area (west of 166° W longitude) showed unprecedented levels of tanner crab abundance (CPT report; link provided in section 7.4.1).

There has been a decreasing trend in the proportion of tanner crab males that make the terminal molt to maturity at the industry-preferred size. In 2025, 28% of tanner crab males east of 166° W longitude and 13% west of 166° W matured at industry-preferred size. Because of the terminal molt, individuals maturing at small sizes will never grow large enough to be targeted by the fishery.

Hybrid Chionoecetes survey results were notable, with unprecedentedly high abundance for all size-sex categories. In 2025, 20% of all Chionoecetes males ≥101 mm captured in the survey were hybrids. Hybrids fall into the legal definition of snow crab when caught in the fishery. This situation has been identified as an emerging issue whose biological and fishery management implications are to be considered at the May 2026 CPT meeting.

The MMB at the time of mating was estimated to have been highest in the early 1970s (close to 400 kt), with secondary peaks in 1989 (108 kt), 2008 (122 kt), and 2014 (117 kt). The estimated MMB on 15 February 2025 was 99.5 kt and the projection for 15 February 2026 was 75.96 kt under the assumption that the OFL is taken. Estimates of recruitment since 1999 have been generally low relative to the peaks estimated for the period prior to 1990.

[9] ADF&G Advisory Announcement (10/6/2025) 1740916530.pdf
[10] 2025 TANNER CRAB SAFE CHAPTER

Lack of cohort progression subsequent to recruitment pulses has been a concerning source of uncertainty, though the most recent strong recruitment signal in 2023 appears to be propagating to larger size classes over the last two years.

The tanner crab stock has been a Tier 3 stock since the 2012/13 assessment cycle, given the informative nature of fishery, survey, and life history information for this stock. The author and CPT recommended Model 22.03d5 for harvest specifications. This is the same model as last year with updated data. The SSC supports using Model 22.03d5 for 2025/26 harvest specifications and supports the resulting author and CPT recommended OFL. Based on the projected biomass on 15 February 2026, the stock is at 176% of B_{MSY} placing it in Tier 3a. Since the current MMB is above MSST, the stock is not overfished. The overall catch in 2024/25 was less than the 2024/25 OFL, therefore, overfishing did not occur (CPT and SSC reports; links provided in section 7.4.1).

The ABC decision-making process was informed by a Risk Table and Ecosystem and Socioeconomic Profile (ESP) which were appended to the 2025 tanner crab SAFE report. The Tier 3a OFL control rule results in a total OFL of 51.02 kt. The CPT continues to recommend a buffer of 20% between OFL and ABC for this stock, which was also recommended by the SSC last year. Since the major uncertainties and concerns about the assessment have not changed, the SSC continues to recommend an ABC buffer of 20% for tanner crab to account for model and stock productivity uncertainty which sets the ABC = 40.81 kt.

The 2025 estimates of mature male tanner crab biomass are above the threshold required to open fisheries in eastern and western areas of the Bering Sea District. The 2025/26 TACs for the tanner crab fishery were 4,590 t west of 166° W and 513 t east of 166° W. [11]

7.4.5 Aleutian Islands Golden King Crab

The fishery is managed separately east (EAG) and west (WAG) of 174◦ W longitude. In the 2024/25 season the TAC was 1,706 t in the EAG and 508 t in the WAG. Only two vessels participated in each of the EAG and WAG fisheries (four vessels combined) in 2024/25. Not all participants signed confidentiality waivers, therefore EAG- or WAG-specific data are confidential. Retained catch between both east and west management areas has generally declined since 2019/20. During the 2024/25 fishery, the estimated total retained catch was 2.215 kt, while the estimated total catch mortality was 2.341 kt. Total catch has declined over recent years from 3.056 kt in 2021/22. Total catch mortality includes retained catch, discard mortality in the directed fishery, and bycatch mortality in groundfish fixed gear and trawl fisheries. Directed fishery discard mortality and groundfish fishery bycatch have remained low and stable in recent history (BSAI Crab SAFE Intro; link provided in section 7.4.1). [12]

Estimated mature male biomass (MMB) for the EAG increased from 2014 to 2022 and has declined from 2023. Estimated MMB for the WAG declined steadily during the 2010s to a low in 2021 followed by a slight increase since 2022. Recruitment to the EAG has declined from a high in 2017 to low but stable recruitment since 2021. Recruitment to the WAG in 2023 and 2024 was the highest since 2013 but remains uncertain because they are still relatively poorly selected by the fishery.

The CPT endorsed, and the SSC subsequently approved, the GMACS model for this stock in January 2023, and GMACS formed the basis for subsequent annual assessments. The assessment author examined two models for

[11] ADF&G Advisory Announcement (10/6/2025) 1741022333.pdf
[12] AIGKC SAFE May 2025

the EAG and WAG in the May 2025 assessment. For the EAG, the two models provided very similar results. Both models fit the retained catch, total catch, and groundfish bycatch data well. For the WAG, the two models fit the respective catch data and standardized CPUE indices equally well and produced similar estimates for the recruitment and MMB time series. The author-preferred model was 23.1c for both areas.

The assessment for AI golden king crab establishes a single OFL and ABC for the whole stock. However, separate models are available by area. During its May 2017 meeting, the CPT recommended that stock status be determined by adding the area-specific estimates of current MMB and B_{MSY} to ensure that there would only be one stock status for the AIGKC stock. However, area-specific stock status is used to determine the ratio of F_{OFL} to $F_{35\%}$ by area, which is then used to calculate the OFLs by area, which are then summed to calculate an OFL for the entire stock. The SSC has concurred with this approach. The total catch in 2024/25 (2.34 kt) was less than the OFL (3.73 kt) so, overfishing did not occur, and MMB in 2024/25 was 11.09 kt, which is 98% B_{MSY} and the stock is not overfished (CPT and SSC reports; links provided in section 7.4.1).

The ABC decision-making process was informed by a Risk Table which was appended to the 2025 AI golden king crab SAFE assessment report. The 2025/26 OFL was estimated at 3.166 kt. The CPT recommends that this stock be managed as a Tier 3 stock in 2025/26. This is the only crab assessment that relies solely on fishery CPUE as an index of abundance and the index standardization process is a key reason for the 25% buffer between the OFL and the ABC used in the past. Thus, the CPT recommended continuing to use a 25% buffer, its value for the last three years, on the OFL for the ABC. The SSC endorsed the OFL and ABC recommendations of the CPT. The resulting ABC for 2025/26 is 2.374 kt.

AI golden king crab TACs for 2025/26 are 1,506 t East of 174° W longitude and 395 t West of 174° W longitude.[13]

7.5. Update on fishery catches

The following tables that include recent catches in the BSAI crab fisheries under consideration are from the introduction to the 2025 SAFE report (link provide in section 7.4.1).

Table 5. Status and catch specifications (1000 t) for snow crab. Shaded values are new estimates or projections based on the current assessment. Other table entries are based on historical assessments and are not updated except for total and retained catch.

Year	MSST	Biomass (MMB)	TAC	Retained Catch	Total Catch	OFL	ABC
2021/22	91.6	41.3	2.5	2.5	3.6	7.5	5.6
2022/23	136.9	92.4	Closed	0	0.06	10.3	7.7
2023/24	95.9	155.91	Closed	0	0.11	15.4	7.7
2024/25	46.75*	19.0*	2.1	2.1	2.81	19.6	6.86
2025/26		31.1*				3.26*	2.6*

**Values reflect ≥95mm carapace width definition of male maturity*

[13] ADF&G Advisory Announcement 1681461821.pdf

Table 6. Status and catch specifications (1000 t) for Bristol Bay red king crab. Shaded values are new estimates or projections based on the current assessment. Other table entries are based on historical assessments and are not updated except for total and retained catch.

Year	MSST	Biomass (MMB)	TAC	Retained Catch	Total Catch	OFL	ABC
2021/22	12.01	16.64	0	0.02	0.10	2.23	1.78
2022/23	9.68	18.34	0	0.02	0.07	3.04	2.43
2023/24	9.35	18.65	0.975	0.96	1.34	4.42	3.54
2024/25	9.26	19.74	1.05	1.05	1.20	5.02	4.02
2025/26		16.84				5.85	4.68

Table 7. Status and catch specifications (1000 t) for Tanner crab. Shaded values are new estimates or projections based on the current assessment. Other table entries are based on historical assessments and are not updated except for total and retained catch.

Year	MSST	Biomass (MMB)	TAC	Retained Catch	Total Catch	OFL	ABC
2021/22	17.37	62.05	0.50	0.49	0.78	27.17	21.74
2022/23	18.19	74.17	0.91	0.91	1.19	32.81	26.25
2023/24	20.00	88.21	0.94	0.94	1.09	36.20	27.15
2024/25	21.61	99.53	2.84	2.85	3.09	41.29	33.03
2025/26		75.96				51.02	40.81

Table 8. Historical status and catch specifications for St. Matthew Island blue king crab (kt). Shaded values are new estimates or projections based on the current assessment. Other table entries are based on historical assessments and are not updated except for total and retained catch.

Year	MSST	Biomass (MMB)	TAC	Retained Catch	Total Catch	OFL	ABC
2020/21	1.65	1.14	0.00	0.00	0.001	0.05	0.04
2021/22	1.63	1.18	0.00	0.00	0.001	0.05	0.04
2022/23	1.50	1.31	0.00	0.00	0.002	0.066	0.050
2023/24	1.48	1.41	0.00	0.00	0.001	0.066	0.050
2024/25		1.53	0.00	0.00	0.001	0.129	0.097
2025/26		1.53				0.129	0.097

Table 9. Status and catch specifications (1000 t) for Aleutian Islands golden king crab. Shaded values are new estimates or projections based on the current assessment. Other table entries are based on historical assessments and are not updated except for total and retained catch.

Year	MSST	Biomass (MMB)	TAC	Retained Catch	Total Catch	OFL	ABC
2021/22	5.859	12.592	2.690	2.699	3.056	4.817	3.372
2022/23	5.832	13.600	2.291	2.369	2.612	3.761	2.821
2023/24	5.772	12.716	2,508	2,578	2.761[a]	4.182	3.137
2024/25	5.632	11.087	2.214	2.287	2.426	3.725	2.794
2025/26		10.480				3.166	2.374

7.6. Significant changes in the ecosystem effects of the fishery

Surveillance audit results indicate that there were no significant changes in the ecosystem effects of the fishery (e.g., no major changes in bycatch, discards, ETP species interactions, gear habitat interactions). The evidence viewed by the assessment team confirms that the certified BSAI king and Tanner crab fisheries remain in conformity with RFM Fundamental Clause 12. There is in place a robust fisheries management system that appropriately and adequately considers fishery interactions and effects on the ecosystem (NPFMC, 2011). The BSAI crab fishery management system is based on the best available science while allowing for inputs from fishery participants and other stakeholders including the provision of local and/or traditional knowledge. The management system also incorporates risk-based approaches for determining the most probable adverse impacts of the fishery so that potentially adverse impacts of the fishery on the ecosystem are appropriately assessed and effectively addressed. Habitat protection areas, prohibited species catch (PSC) limits, and crab bycatch limits, are in place to protect important benthic habitat for crab and other resources and to reduce crab bycatch in the trawl and fixed gear groundfish fisheries. If PSC limits are reached in bottom trawl fisheries executed in specific areas, those fisheries are closed. The crab fisheries catch a small quantity of other species as bycatch. A limited number of groundfish, such as Pacific cod, Pacific halibut, and yellowfin sole are caught in the directed pot fishery as well as small amounts of invertebrates (gastropods and echinoderms). Such interactions are appropriately assessed and effectively addressed.

7.7. Violations and enforcement information

Enforcement information for the BSAI commercial crab fisheries indicates a high level of compliance in 2024. USCG boarding records for the reporting period (01 Jan 2024–02 Dec 2025, including CY2024) show boardings in Bristol Bay red king crab (9), Tanner crab (1), and Aleutian Islands golden king crab (2), with no boardings recorded for East Bering Sea snow crab or St. Matthew Island blue king crab; USCG reported zero safety violations and one fisheries violation (improper retention of Pacific halibut for use as bait: 1), and no gear loss was observed or reported.

In 2024, NOAA OLE in Alaska maintained consistent oversight of the BSAI crab sector, supporting Certified Seafood International's expectations for transparent, risk-based compliance monitoring. Enforcement presence included five vessel boardings and review of 29 incidents. The majority (16) were closed with no violation or no action, indicating strong baseline compliance across the fleet.

The remaining 13 incidents produced 17 confirmed violations, primarily administrative or technical in nature. These included VMS operability issues, recordkeeping and reporting errors, gear-marking deficiencies, and misreporting of personal-use crab. More serious cases—illegal possession of groundfish and illegal possession of prohibited species—were addressed through seizures and summary settlements, demonstrating appropriate escalation where resource-protection risks were present.
Violations were distributed across BBRKC, AIGKC, NSRKC, and WBT–EBT fisheries, with no evidence of systemic or fishery-wide non-compliance. Enforcement responses emphasized corrective action and education, consistent with CSI's expectations for proportional, transparent, and effective compliance management.

AWT 2024 enforcement data similarly supports very high compliance: patrol coverage was limited in some fisheries (snow crab and Aleutian Islands golden king crab, where enforcement relied on dockside boardings), while in Bristol Bay red king crab the PV Stimson inspected 100 pots across 20 vessels and observed no gear violations and conducted eight boardings; across open fisheries AWT reported 98 boardings (with additional boardings likely untracked due to missing slips) and issued a small number of citations relevant to these fisheries, including gear requirements (3 citations; 5 AAC 35.525(b)(1)), fish ticket submission/accuracy (2 citations; 5 AAC 39.130(c) and 5 AAC 39.130(c)(9)), and escape mechanism requirements (1 citation; 5 AAC 39.145(1)); overall, AWT reported no compliance concerns.

7.8. Other information that may affect the outcome of certification

There was no other information that may affect the outcome of certification.

7.8.1. Section A: The Fisheries Management System

7.8.1.1. Fundamental Clause 1. Structured and legally mandated management system

1.	**There shall be a structured and legally mandated management system based upon and respecting international, State, and local fishery laws, for the responsible utilization of the stock under consideration and conservation of the marine environment.**
Summary of relevant changes:	1.1. There shall be an effective legal and administrative framework established at local and national level appropriate for the fishery resource and conservation and management In calendar year 2025, the BSAI Crab SAFE Introduction documents the continued operation of the formal review and decision pathway (CPT review and recommendations; SSC review; Council review), including the timing and organization of reviews that support annual harvest specification setting and stock status determinations. This reinforces that the legal and administrative framework remains active, structured, and fit-for-purpose. (NPFMC, 2025a). In December 2025, NMFS/Council documentation advanced a proposed housekeeping amendment to update and reorganize the Crab FMP to reflect updated information and improve clarity/consistency with modern FMP guidance, while explicitly describing the action as non-substantive (i.e., not changing harvest levels, timing, effort, or authorized gear). This demonstrates active maintenance of the management framework and continued alignment with federal management requirements and best practice in plan administration. (NMFS, 2025a; NPFMC, 2025a). 1.2. Management measures shall take into account the whole stock unit over its entire area of stock distribution. Clause 1.2 of the CSI RFM Standard v2.2 requires that "management measures shall take into account the whole stock unit over its entire area of stock distribution"

1.	There shall be a structured and legally mandated management system based upon and respecting international, State, and local fishery laws, for the responsible utilization of the stock under consideration and conservation of the marine environment.

Updates for 2025 provide additional evidence that BSAI crab management continues to account for stock-scale spatial structure and distribution, including internal spatial heterogeneity within stock units. The annual SAFE process and Crab Plan Team (CPT) / SSC review framework continues to integrate fishery-dependent and fishery-independent information across the Crab FMP stocks and supports stock-scale management considerations (NPFMC, 2025a). In 2025, crab survey results presented to the CPT explicitly highlighted spatial distribution patterns and changes in centers of abundance (e.g., contrasting east vs west patterns for Tanner crab and changes in snow crab distribution during recovery), reinforcing that management deliberations continue to consider stock distribution over broad spatial domains rather than only localized fishing footprints (Zacher et al., 2025; NPFMC, 2025c).

Bering Sea Tanner crab (east/west of 166°W). The 2025 Tanner crab SAFE documentation reiterates that management and TAC setting occur separately in areas east and west of 166°W longitude within the State management structure, reflecting spatially explicit administration aligned with stock distribution and fishery operations (Stockhausen, 2025). 2025 survey presentations to the CPT further emphasized spatial contrasts between Tanner crab east of 166°W and west of 166°W, consistent with a management approach that considers distributional differences across the stock's range (Zacher et al., 2025).

Aleutian Islands Golden King Crab (AIGKC; east/west of 174°W). The 2025 AIGKC SAFE materials explicitly state that the assessment establishes a single OFL/ABC for the whole Aleutian Islands golden king crab stock, while evaluating separate east and west subarea models due to differing abundance trends, thereby accounting for the full stock unit while recognizing internal spatial heterogeneity (Jackson, 2025a). In addition, 2025 ADF&G/NMFS advisory documentation confirms that Aleutian Islands golden king crab are managed east and west of 174°W longitude with separate TAC allocations for each area, supporting spatially explicit management across the stock distribution (NMFS/ADF&G, 2025)

Eastern Bering Sea snow crab. ADF&G's 2025 advisory announcement documents that management decisions are based on stock-scale indicators (e.g., biomass thresholds for opening) and includes spatially explicit measures responding to survey information (including a defined target area associated with unprecedented hybrid Chionoecetes abundance), supporting the conclusion that measures are responsive to distributional and biological attributes across the stock area (ADF&G, 2025a). 2025 survey results also describe distributional patterns and size-structure features relevant to stock-scale management (e.g., recovery in smaller size classes alongside industry-preferred male abundance remaining low), further supporting consideration of the stock unit across its distribution (Zacher et al., 2025).

Bristol Bay Red King Crab (BBRKC). Whole-genome work highlighted in 2025 communications supports the existence of stronger-than-previously documented population structure and local adaptation signals across Alaska red king crab regions, reinforcing the rationale for managing at regional/stock-unit scales and emphasizing the importance of avoiding genetic mismatch if enhancement is considered (NOAA, 2025a; KUCB, 2025; St. John et al., 2024). In addition, the 2025 BBRKC assessment documentation updates stock information used in the annual management cycle (Palof, 2025).

St. Matthew Island blue king crab (SMBKC

St. Matthew Island blue king crab (SMBKC). The September 2025 "off-year" SMBKC update maintained stock-scale accounting by defining total stock-scale accounting by defining total male catch as bycatch mortality across fisheries (including groundfish and snow crab fisheries) when

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directed fishing is closed, reflecting a whole-stock perspective that accounts for mortality sources across the stock's manageably sources across the stock's managed distribution (Stern and Palof, 2025). NMFS also formally reported in 2025 that SMBKC continues to be overfished based on the most recent assessment, supporting continued stock-scale conservation and rebuilding measures under the Crab FMP framework (NMFS, 2025b).

1.6 The means to finance fisheries management organizations are agreed and such arrangements aim to recover costs of fisheries conservation, management, and research.

Fisheries management activities, organizations, and arrangements for BSAI crab fisheries are financed through defined procedures that include both public funding and cost-recovery mechanisms. Core management, research, and enforcement functions are supported through federal appropriations, including NMFS program funding and associated support for State implementation, alongside Alaska State funding for in-season management and program delivery.

1.7. Review and Revision of conservation and management measures.

In calendar year 2025, two major federal cost-recovery mechanisms relevant to BSAI crab fisheries were documented and updated. First, NMFS published the BSAI Crab Rationalization Program cost recovery fee percentage for the 2025/2026 crab fishing year as 1.2% of ex-vessel value, a mechanism designed to recover actual costs directly related to management, data collection, and enforcement of the program, with a proportional share forwarded to the State of Alaska for its management and data collection costs (NMFS, 2025a). This cost recovery framework applies to the rationalized crab fisheries within scope (including BBRKC, EBS snow crab, EBT/WBT Tanner crab, SMBKC, and AIGKC east and west of 174°W) (NPFMC, n.d.; NMFS, 2025a) Second, NMFS issued a 2025 fee rate adjustment under the BSAI crab fishing capacity reduction (buyback) program, reducing the Bristol Bay red king crab reduction endorsement fee rate to 1% effective for landings beginning October 15, 2025, while other reduction endorsement fisheries remained at 5% (NMFS, 2025c)

At the State level, ADF&G continues to use test fish revenues as a defined funding source supporting crab observer and research programs. In 2025, ADF&G procurement actions explicitly documented revenue targets from test fishery harvest/purchase arrangements, including a revenue goal of $1,300,000 associated with a Bristol Bay red king crab test fishery to support Bering Sea crab observer and research programs, and a revenue goal of $500,000 associated with an Aleutian Islands golden king crab test fishery to support Aleutian Islands crab observer and research programs (ADF&G, 2025b; ADF&G, 2025c). These 2025 developments provide current-year evidence that agreed financing arrangements exist and include cost recovery mechanisms intended to support fisheries conservation, management, and research consistent with Clause 1.6 .

There have been significant updates in 2025 on how additional fishery-specific evidence that conservation and management measures are reviewed and revised operationally when new information becomes available. For Bristol Bay red king crab, the Council initiated an operational review-and-revision pathway for spatial protection measures by requesting the Bering Sea pollock industry develop dynamic spatial closures for the 2026 A-season to protect BBRKC, based on new winter pot surveys, tagging data, and other recent data sources; the Council established a formal reporting and review point at the December 2025 meeting (NPFMC, 2025e; Cordova Times, 2025). In December 2025, the Council's B9 Action Memo documented receipt of industry reporting on dynamic spatial closure measures and the ability to act as necessary, demonstrating an iterative mechanism for revising operational measures to reduce BBRKC interactions (NPFMC, 2025e).

1.	**There shall be a structured and legally mandated management system based upon and respecting international, State, and local fishery laws, for the responsible utilization of the stock under consideration and conservation of the marine environment.**
	For Eastern Bering Sea snow crab, ADF&G's October 2025 advisory demonstrates adaptive revision of operational measures in response to new monitoring information, including implementation of spatially explicit measures associated with unprecedented hybrid *Chionoecetes* abundance (e.g., defined target area) and continued use of spatial protection closures to protect vulnerable crab stocks (ADF&G, 2025a). For Bering Sea Tanner crab, ADF&G's October 2025 advisory documents annual operational review of biomass relative to opening thresholds and implementation of separate fisheries west and east of 166°W (WBT and EBT) with area-specific IFQ/CDQ allocations (ADF&G, 2025b). Operational mixed-catch rules were also updated/communicated in 2025 through reciprocal retention allowances: the Tanner crab advisory allows limited Tanner retention during the snow crab fishery (5% of snow crab onboard), while the snow crab advisory allows limited snow crab retention during the Tanner fisheries (up to 35% of Tanner crab onboard), reflecting operational measure adjustments to address mixed catch and reduce discard incentives (ADF&G, 2025a; ADF&G, 2025b). For Aleutian Islands golden king crab, 2025 advisory documentation confirms continued operational implementation of the east/west split at 174°W with separate area allocations and 2025/26 season dates, demonstrating routine annual operational updates and continued application of spatially explicit management measures (NMFS/ADF&G, 2025). For St. Matthew Island blue king crab, ADF&G's 2025/26 announcements continue to list the directed fishery as closed, indicating ongoing operational maintenance of conservation measures under continuing review (ADF&G, 2025c). 1.8. Transparent management arrangements and decision making. There are updates in year 2025 providing further evidence supporting Clause 1.8 regarding transparent management arrangements and decision making. In 2025, NPFMC continued to provide comprehensive public access to meeting materials and participation mechanisms through its eAgenda system, which posts agenda items and downloadable attachments, specifies written public comment periods and deadlines, provides links and instructions for oral testimony sign-ups, and notes that meetings are broadcast and recorded with recordings posted after meetings (NPFMC, 2025a; NPFMC, 2025b). The Council also continued to provide forward transparency via the publicly available "Three Meeting Outlook," and 2025 draft outlook documents explicitly listed upcoming agenda topics and timing (including crab specifications and related crab management items), enabling stakeholders to anticipate and prepare comments and testimony (NPFMC, 2025c; NPFMC, 2025d). In addition, NMFS continued to publish Federal Register notices in 2025 announcing Council meetings and webinars and directing the public to the online posting of agendas and meeting materials (NMFS, 2025a; NMFS, 2025b). Transparency of management arrangements and decisions was also demonstrated through Council communications in 2025, including publication of Council-level outcomes on BSAI crab management process changes (e.g., final recommendations on Crab Rationalization arbitration system changes summarized in the Council's December 2025 newsletter) (NPFMC, 2025e). Where logistical constraints affected meeting format, NPFMC provided transparent communication about meeting conduct, noting in 2025 that an upcoming Council meeting would be held by webinar due to funding uncertainty while continuing public access through remote participation (NPFMC, 2025f). At the State level, Alaska Board of Fisheries processes remained transparent in 2025 through publicly accessible meeting schedules, agendas/meeting information, and links to documents and audio

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	recordings (ADF&G, 2025a). The BOF proposal system also continued to support transparent participation, with proposal books available online (including the 2024–2025 proposal book) and clearly stated public comment submission routes and timelines, and 2025 materials publicly posted calls for proposals and proposal deadlines (ADF&G, 2024; DOI, 2025). ADF&G also maintained public posting of BSAI crab fishery announcements, including openings/closures and operational requirements, through its public shellfish fishery information pages (ADF&G, 2025b). 1.3./1.4/1.5./ 1.9 Transboundary stocks. The five stocks under assessment are not considered shared, straddling, high seas, or highly migratory stocks, nor are they considered common shared resources exploited by two or more States. **As such, the following six supporting clauses are not applicable**: **1.3, 1.3.1, 1.4, 1.4.1, 1.5, 1.9**
References:	Clause 1.1. Alaska Department of Fish and Game (ADF&G) (2025a) Bering Sea Snow Crab Season Opens October 15; Total Allowable Catch Announced. Advisory Announcement, 6 October 2025. Available at: https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1741176837.pdf Alaska Department of Fish and Game (ADF&G) (2025b) Bering Sea Tanner Crab Season Opens October 15; Total Allowable Catch Announced. Advisory Announcement, 6 October 2025. Available at: https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1741022333.pdf Alaska Department of Fish and Game (ADF&G) (2025c) Bering Sea/Aleutian Islands Shellfish – Announcements (includes 2025/26 Saint Matthew Island Section Blue King Crab Season Closed listing dated 6 October 2025). Available at: https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareaaleutianislands.shellfish Alaska Department of Fish and Game (ADF&G) (2025d) Alaska Board of Fisheries Meeting Information (meeting documents and recordings available via meeting links). Available at: https://www.adfg.alaska.gov/index.cfm?adfg=fisheriesboard.meetinginfo Alaska Department of Fish and Game (ADF&G) (2025e) ADF&G ITB #2026-1100-0048 – 2025 Test Fishery Harvest and Purchase of Bristol Bay Red King Crab (BBRKC). Alaska Online Public Notices, 23 July 2025. Available at: https://aws.state.ak.us/OnlinePublicNotices/Notices/View.aspx?id=220280 Alaska Department of Fish and Game (ADF&G) (2025e) Aleutian Islands Golden King Crab Total Allowable Catch and Season Dates Announced. Advisory Announcement, 20 June 2025. Available at: https://www.fisheries.noaa.gov/s3/2025-07/aleutian-crab-tac-2025_0.pdf Alaska Department of Fish and Game (ADF&G) (2025f) 2025 Test-fishery Harvest and Purchase of Aleutian Islands Golden King Crab (*Lithodes aequispinus*) for ADF&G Crab Observer and

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National Marine Fisheries Service (NMFS) (2025c) Fisheries of the Exclusive Economic Zone Off Alaska; Bering Sea and Aleutian Islands Crab Rationalization Cost Recovery Program (notification of fee percentage). Federal Register, 28 July 2025. Available at: https://www.federalregister.gov/documents/2025/07/28/2025-14135/fisheries-of-the-exclusive-economic-zone-off-alaska-bering-sea-and-aleutian-islands-crab (

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1.	**There shall be a structured and legally mandated management system based upon and respecting international, State, and local fishery laws, for the responsible utilization of the stock under consideration and conservation of the marine environment.**	
		Alaska Department of Fish and Game (ADF&G) (2025a) Aleutian Islands Golden King Crab Total Allowable Catch and Season Dates Announced. Advisory Announcement, 20 June 2025. Available at: https://www.fisheries.noaa.gov/s3/2025-07/aleutian-crab-tac-2025_0.pdf (Accessed: 6 February 2026). NOAA Fisheries (2025a) Genetic Diversity in Alaska Red King Crab May Provide Resilience to Climate Change. Feature story. Available at: https://www.fisheries.noaa.gov/ North Pacific Fishery Management Council (NPFMC) (n.d.) BSAI Crab Rationalization Program (program description; list of CR fisheries). Available at: https://www.npfmc.org/fisheries-issues/fisheries/bsai-crab-allocations/ (North Pacific Fishery Management Council (NPFMC) (2025a) Stock Assessment and Fishery Evaluation Report for the King and Tanner Crab Fisheries of the Bering Sea and Aleutian Islands Regions: 2025 Crab SAFE Introduction. October 2025. Available at: https://meetings.npfmc.org/CommentReview/DownloadFile?p=ff9e93cd-a1ad-44d2-8742-feea8b13e0b0.pdf&fileName=C3%20BSAI%20Crab%20SAFE%20Introduction.pdf North Pacific Fishery Management Council (NPFMC) (2025b) BSAI Crab Fisheries (program page; SAFE links and program description). Available at: https://www.npfmc.org/fisheries/bsai-crab/ North Pacific Fishery Management Council (NPFMC) (2025c) CPT meeting presentation materials summarizing crab stocks and survey results. October 2025 meeting slide deck. North Pacific Fishery Management Council meeting materials. North Pacific Fishery Management Council (NPFMC) (2025d) B9 Action Memo: Bering Sea pollock industry report on dynamic spatial closure measures for 2026. December 2025 meeting materials. North Pacific Fishery Management Council. North Pacific Fishery Management Council (NPFMC) (2025e) NPFMC Meetings eAgenda page (October 2025 Council/AP meeting). Available at: https://meetings.npfmc.org/Meeting/Details/3095 North Pacific Fishery Management Council (NPFMC) (2025f) SSC eAgenda page (October 2025). Available at: https://meetings.npfmc.org/Meeting/Details/3096 North Pacific Fishery Management Council (NPFMC) (2025g) Three Meeting Outlook. Available at: https://www.npfmc.org/three-meeting-outlook/ North Pacific Fishery Management Council (NPFMC) (2025h) Draft Three-Meeting Outlook. June 2025 meeting materials. North Pacific Fishery Management Council. North Pacific Fishery Management Council (NPFMC) (2025i) December 2025 Newsletter. Available at: https://www.npfmc.org/december-2025-newsletter/

1.	There shall be a structured and legally mandated management system based upon and respecting international, State, and local fishery laws, for the responsible utilization of the stock under consideration and conservation of the marine environment.
	North Pacific Fishery Management Council (NPFMC) (2025j) June 2025 Newsletter. Available at: https://www.npfmc.org/june-2025-newsletter/ Palof, K. (2025) Bristol Bay Red King Crab Stock Assessment 2025. North Pacific Fishery Management Council meeting documents, September 2025. Stern, C.A. and Palof, K. (2025) Saint Matthew Island Blue King Crab update 2025 (off-year update). North Pacific Fishery Management Council meeting documents, September 2025. St John, C.A., Timm, L.E., Gruenthal, K.M. and Larson, W.A. (2024) Whole Genome Sequencing Reveals Substantial Genetic Structure and Evidence of Local Adaptation in Alaskan Red King Crab. Evolutionary Applications. doi:10.1111/eva.70049. Stockhausen, W.T. (2025) 2025 Stock Assessment and Fishery Evaluation Report for the Tanner Crab Fisheries of the Bering Sea and Aleutian Islands Regions (SAFE chapter). North Pacific Fishery Management Council meeting documents, September 2025. U.S. Department of the Interior (DOI) (2025) Board of Fisheries Call for Proposals (schedule document). Available at: https://www.doi.gov/sites/default/files/documents/2025-01/bog-combined.pdf (Accessed: 6 February 2026). Zacher, L. et al. (2025) 2025 Eastern Bering Sea Crab Survey Results (CPT presentation). North Pacific Fishery Management Council meeting materials, 2025.
Statement of consistency to the CSI RFM Fishery Standard 2.2	**The fishery continues to conform to the requirements of Fundamental Clause 1 of the CSI RFM Fishery Standard 2.2**

7.8.1.2. Fundamental Clause 2. Coastal area management frameworks

2.	Management organizations shall participate in coastal area management, decision-making processes and activities related to the fishery and its users, supporting sustainable and integrated resource use, and conflict avoidance.
Summary of relevant changes:	<u>2.1/2.2/2.3/2.4 Policy, legal and institutional frameworks adopted to achieve sustainable and integrated use of marine resources along with mechanisms to avoid conflict shall be in place.</u> In 2025, there were significant updates providing additional evidence supporting Clauses 2.1–2.4 that policy, legal and institutional frameworks are in place to support sustainable and integrated use of marine resources and to avoid conflict among users. **Policy and institutional planning (Clauses 2.1–2.3)**. In 2025, NPFMC continued to implement transparent, structured processes to support policy development and integrated management planning, including a publicly noticed webinar (March 6, 2025) intended to orient stakeholders to

2.	**Management organizations shall participate in coastal area management, decision-making processes and activities related to the fishery and its users, supporting sustainable and integrated resource use, and conflict avoidance.**

materials related to the Council's Programmatic Evaluation, with meeting materials and comment mechanisms posted via the Council's eAgenda (NMFS, 2025a). Forward transparency about upcoming policy and management topics was maintained through the publicly available "Three-Meeting Outlook" and 2025 draft Outlook documents, which listed agenda themes and timing across upcoming meetings (including crab-related items), enabling stakeholders to anticipate decision points and prepare testimony and written comments (NPFMC, 2025a; NPFMC, 2025b).

Legal and administrative processes (Clause 2.2). Federal Register notices in 2025 continued to announce NPFMC meetings and direct stakeholders to where the latest agendas and meeting materials would be posted online, supporting clear documentation of decision processes and broad access to management information (NMFS, 2025b). At the management plan level, NMFS advanced a 2025 "housekeeping amendment" analysis to update and reorganize the BSAI King and Tanner Crab FMP, demonstrating ongoing formal maintenance of the management framework (NMFS, 2025c). At the state level, ADF&G supported clear dissemination of management rules by publishing the 2025–2026 Statewide King and Tanner Crab Commercial Fishing Regulations and noting that any later changes would be reflected in updated PDFs posted online (ADF&G, 2025a; ADF&G, 2025b).

Public access and participation (Clauses 2.3). In 2025, NPFMC continued to provide structured opportunities for consultation and engagement using its eAgenda pages, which publicly posted agenda items, downloadable attachments, written public comment deadlines, oral testimony sign-ups, web participation details, and meeting recording information (NPFMC, 2025c; NPFMC, 2025d; NPFMC, 2025e). Similarly, Alaska Board of Fisheries (BOF) processes remained transparent in 2025 through publicly accessible meeting schedules and meeting information pages (including links to meeting materials and recordings) and the proposal system (including the 2024–2025 Proposal Book considered through March 2025) that provides structured pathways for public proposals, written comments, and oral testimony (ADF&G, 2025c; ADF&G, 2024).

Conflict avoidance mechanisms (Clause 2.4) In 2025, mechanisms to avoid conflict among users were advanced and documented in two complementary ways. First, to reduce conflicts and interactions between fisheries (e.g., pollock operations and crab conservation objectives), the Council requested the Bering Sea pollock industry develop dynamic spatial closures for the 2026 A season to protect Bristol Bay red king crab (BBRKC) based on new surveys/tagging and other information sources, and established a formal review point at the December 2025 meeting (NPFMC, 2025f; Cordova Times, 2025). The December 2025 B9 Action Memo documents receipt of industry reporting and an action pathway to implement or adjust spatial measures as necessary (NPFMC, 2025f). Second, to reduce conflict within the crab rationalization system (e.g., harvester–processor negotiations and dispute resolution), the Council published final recommendations in December 2025 to revise the BSAI Crab Rationalization arbitration system (including changes such as removing "last best offer" arbitration and removing a market report requirement, and streamlining reporting

2.	**Management organizations shall participate in coastal area management, decision-making processes and activities related to the fishery and its users, supporting sustainable and integrated resource use, and conflict avoidance.**

to NMFS), demonstrating active refinement of program mechanisms intended to reduce disputes and improve functionality (NPFMC, 2025g).

2025 updates by species

For Bristol Bay red king crab (BBRKC), ADF&G/NMFS publicly announced the 2025/26 season opener and associated operational requirements via a formal advisory, while the Council's dynamic-closure initiative demonstrates an explicit conflict-avoidance pathway with the pollock fishery (NMFS/ADF&G, 2025a; NPFMC, 2025f).
For Saint Matthew Island blue king crab (SMBKC), ADF&G publicly posted the 2025/26 directed season closure, which clarifies access and reduces user conflict while the stock remains constrained (ADF&G, 2025d).
For Aleutian Islands golden king crab (AIGKC), ADF&G/NMFS documented continued east/west area-based administration (174°W split) with separate allocations and season dates, supporting orderly access and minimizing operational conflicts between subareas (NMFS/ADF&G, 2025b).
For Bering Sea Tanner crab, ADF&G's 2025 advisory confirms the EBT/WBT operational split at 166°W with separate allocations and season structure, a longstanding mechanism that reduces conflict by clearly defining where and when fishing may occur (ADF&G, 2025e).
For eastern Bering Sea snow crab, ADF&G's 2025 advisory publicly documented spatially explicit measures tied to hybrid *Chionoecetes* distribution (including a defined target area), providing operational clarity intended to reduce uncertainty and facilitate coordinated fishing activity (ADF&G, 2025f).

Operationally, ADF&G continued to publish fishery announcements and management measures (including area-based fishery structures, seasons, and closures for BBRKC, AIGKC, Tanner crab, snow crab, and SMBKC) through its BSAI shellfish announcements page, supporting integrated use and reducing uncertainty among participants by providing clear public information on management measures (ADF&G, 2025d).

2.5 The economic, social and cultural value of coastal resources shall be assessed in order to assist decision-making on their allocation and use.

Year 2025 updates:

The 2025 BSAI Crab SAFE Introduction reiterates that the annual SAFE report summarizes not only the biological status of crab fisheries but also their economic status and analytical information used for management decisions (NPFMC, 2025a). In addition, the Council and NMFS maintained transparent public processes in 2025 for reviewing socioeconomic information requirements, including listing Economic Data Reports (EDR) Removal as an agenda item for initial/final review in the 2025 Council cycle (NMFS, 2025a).

A major 2025 development relevant across Bristol Bay red king crab, St. Matthew blue king crab, Aleutian Islands golden king crab (east/west of 174°W), Bering Sea Tanner crab (EBT/WBT), and eastern Bering Sea snow crab was the Council's final action in October 2025 to remove EDR

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	reporting requirements from the BSAI Crab Rationalization Program (NPFMC, 2025b). Council documentation for this action states that EDRs were designed to improve analysis of the social and economic effects of catch share programs and to evaluate economic performance and impacts (including bycatch avoidance efforts), and that the Council weighed the benefit of direct cost savings and reduced reporting burden against the loss of time series economic data and broader implications of that loss (NPFMC, 2025c; NPFMC, 2025d). Complementing these changes, NMFS/Council documentation in December 2025 advanced analysis for a Crab FMP housekeeping amendment that includes updated informational content on stocks, fisheries, and fishing communities, indicating ongoing attention to community and human-dimension information used in management contexts (NMFS, 2025b). Continued maintenance of baseline socioeconomic information is also evidenced by a 2025 update to the AFSC community profiles dataset metadata (AFSC, 2025).
References:	Alaska Department of Fish and Game (ADF&G) (2024) Alaska Board of Fisheries 2024/2025 Proposal Book. Available at: https://www.adfg.alaska.gov/static-f/regulations/regprocess/fisheriesboard/pdfs/2024-2025/proposals/book-full%282%29.pdf. Alaska Department of Fish and Game (ADF&G) (2025a) 2025–2026 Statewide King and Tanner Crab Commercial Fishing Regulations (PDF). Available at: https://www.adfg.alaska.gov/static/regulations/fishregulations/pdfs/commercial/cfkingtannercrab20252026.pdf. Alaska Department of Fish and Game (ADF&G) (2025b) Commercial Fishing Regulations (web portal; updated PDFs posted online). Available at: https://www.adfg.alaska.gov/index.cfm?adfg=fishregulations.commercial Alaska Department of Fish and Game (ADF&G) (2025c) Alaska Board of Fisheries Meeting Information (meeting schedule and access to meeting materials/recordings). Available at: https://www.adfg.alaska.gov/index.cfm?adfg=fisheriesboard.meetinginfo . Alaska Department of Fish and Game (ADF&G) (2025d) Bering Sea/Aleutian Islands Shellfish – Announcements (public posting of crab fishery openings/closures). Available at: https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareaaleutianislands.shellfish Alaska Department of Fish and Game (ADF&G) (2025e) Bering Sea Tanner Crab Season Opens October 15; Total Allowable Catch Announced. Advisory Announcement, 6 October 2025.

2. Management organizations shall participate in coastal area management, decision-making processes and activities related to the fishery and its users, supporting sustainable and integrated resource use, and conflict avoidance.

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NMFS and Alaska Department of Fish and Game (ADF&G) (2025a) Bristol Bay Red King Crab Total Allowable Catch (season opens October 15; advisory announcement). Available at: https://www.fisheries.noaa.gov/s3/2025-10/10-06-25*BBR*TAC*AA*final.pdf

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2. Management organizations shall participate in coastal area management, decision-making processes and activities related to the fishery and its users, supporting sustainable and integrated resource use, and conflict avoidance.

Fisheries InPort, Item 24178. Available at: https://www.fisheries.noaa.gov/inport/item/24178.

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North Pacific Fishery Management Council (NPFMC) (2025b) Council Motion: Economic Data Reports Removal (Final Action). 7 October 2025. Available at: https://meetings.npfmc.org/CommentReview/DownloadFile?p=78fc03be-f9e3-4e69-bf03-b6bd00c51645.pdf&fileName=MOTION%20C6%20EDR%20Removal.pdf

North Pacific Fishery Management Council (NPFMC) (2025c) C6 Economic Data Reports Removal October 2025 Action Memo. October 2025 meeting materials. Available at: https://meetings.npfmc.org/CommentReview/DownloadFile?p=a489ab37-f4fd-473c-addf-3d8ad0d7d19e.pdf&fileName=C6%20Action%20Memo.pdf

North Pacific Fishery Management Council (NPFMC) (2025d) C6: Economic Data Reporting Requirements Removal Initial/Final Review (Council presentation). October 2025 meeting materials. Available at: https://meetings.npfmc.org/CommentReview/DownloadFile?p=0f8ad420-2729-4c56-b0cb-2271251731fc&fileName=PPT%20C6%20EDR%20Removals%20Council.pdf

North Pacific Fishery Management Council (NPFMC) (2025e) NPFMC Meetings eAgenda page (October 2025 Council/AP meeting; public comment and testimony signups; attachments). Available at: https://meetings.npfmc.org/Meeting/Details/3095

North Pacific Fishery Management Council (NPFMC) (2025f) SSC October 2025 eAgenda page (public comment and testimony signups; BSAI crab specifications review). Available at: https://meetings.npfmc.org/Meeting/Details/3096

North Pacific Fishery Management Council (NPFMC) (2025g) B9 Action Memo: Bering Sea pollock industry report on dynamic spatial closure measures for 2026. December 2025 meeting materials.

North Pacific Fishery Management Council (NPFMC) (2025h) Three Meeting Outlook (public web page). Available at: https://www.npfmc.org/three-meeting-outlook/

North Pacific Fishery Management Council (NPFMC) (2025i) Draft Three-Meeting Outlook (April/June 2025 versions; lists upcoming agenda topics). NPFMC meeting materials.

2.	**Management organizations shall participate in coastal area management, decision-making processes and activities related to the fishery and its users, supporting sustainable and integrated resource use, and conflict avoidance.**
	North Pacific Fishery Management Council (NPFMC) (2025j) Current or Next Council Meeting (public participation guidance; eAgenda, Zoom, YouTube). Available at: https://www.npfmc.org/current-or-next-council-meeting/ North Pacific Fishery Management Council (NPFMC) (2025k) December 2025 Newsletter (Crab Arbitration final recommendations and other Council actions). Available at: https://www.npfmc.org/december-2025-newsletter/
Statement of consistency to the CSI RFM Fishery Standard 2.2	**The fishery continues to conform to the requirements of Fundamental Clause 2 of the CSI RFM Fishery Standard 2.2**

7.8.1.3. Fundamental Clause 3. Management objectives and plan

3.	**Management objectives shall be implemented through management rules and actions formulated in a plan or other framework.**
Summary of relevant changes:	<u>3.1 Long-term management objectives shall be translated into a plan or other management document and be subscribed to by all interested parties.</u> Significant updates in further demonstrates continued maintenance of the "plan or management document" underpinning long-term objectives. In December 2025, NMFS/Council documentation advanced analysis for a housekeeping amendment (Amendment 57) to update and reorganize the Crab FMP to incorporate updated information on stocks, fisheries, and fishing communities and to improve clarity and alignment with Magnuson–Stevens Act/FMP guidance, while explicitly describing these changes as non-substantive to fishery management measures (NMFS, 2025; NMFS, 2025b). Subscription by interested parties is supported through transparent and inclusive decision-making processes. In 2025, NPFMC continued to provide public access to meeting agendas, supporting documents, written public comment opportunities, and oral testimony signups via the Council's eAgenda and meeting pages, supporting broad stakeholder engagement in review and decision-making processes (NPFMC, 2025b; NPFMC, 2025c). At the state level, ADF&G translated policy into publicly available implementation documents by publishing the 2025–2026 statewide King and Tanner crab commercial fishing regulations booklet and maintaining updated online PDFs when changes occur, ensuring that participants have access to current requirements (ADF&G, 2025a; ADF&G, 2025b). <u>3.2. Management measures should limit excess fishing capacity, promote responsible fisheries, take into account artisanal fisheries, protect biodiversity and allow depleted stocks to recover.</u>

3.	Management objectives shall be implemented through management rules and actions formulated in a plan or other framework.

Conservation and management strategies for BSAI crab continue to limit excessive fishing capacity and support economically sustainable exploitation through the Crab Rationalization (CR) Program (implemented in 2005), which constrains participation, extends seasons, enables cooperatives, and helps reduce derby incentives and operational risk (NPFMC, n.d.)
In year 2025, two additional programmatic signals reinforce capacity and accountability controls: (i) NMFS published the CR Program cost recovery fee percentage (1.2%) for the 2025/26 crab fishing year, which maintains the user pays mechanism for management, data collection, and enforcement (NMFS, 2025a); and (ii) NMFS issued a notice decreasing the BSAI crab capacity reduction (buyback) fee rate to 1% for the Bristol Bay red king crab reduction endorsement fishery, evidencing continued administration of capacity reduction financing (NMFS, 2025b)

In 2025, responsible fishing controls and precautionary harvest strategies continued to be implemented through annual Council/SSC/CPT harvest specifications (NPFMC, 2025a) and State TAC-setting processes (ADF\&G, 2025a). For example, for 2025/26, federal reference points and State TACs remained conservative relative to OFL/ABC for key stocks: BBRKC (OFL 12.90 Mlb; ABC 10.32 Mlb; TAC 2.68 Mlb), EBS snow crab (OFL 44.33 Mlb; ABC 26.60 Mlb; TAC 9.30 Mlb), and EBS Tanner crab (OFL 112.47 Mlb; ABC 89.98 Mlb; TACs 1.13 Mlb east and 10.12 Mlb west), demonstrating continued constraint of retained catch targets within total mortality limits that account for uncertainty and bycatch (ADF\&G, 2025a; ADF\&G, 2025b).

Formal procedures also continue to support recovery of depleted stocks and prevent overfishing through annual stock assessments and status determinations. In 2025, the Bristol Bay red king crab assessment reported the stock was above MSST in 2024/25 (not overfished) and that overfishing did not occur, providing evidence that exploitation remains within biological limits even as retained catches remain constrained (Palof, 2025). For St. Matthew Island blue king crab, the directed fishery remained closed because survey/model estimates of mature males remained below the State harvest strategy threshold, with removals limited to bycatch; the 2025 update confirms total catch remained below OFL (ADF\&G, 2025c; Stern and Palof, 2025). For Aleutian Islands golden king crab, 2025 analyses and status determinations documented that total removals were below OFL (no overfishing) and that reference points were developed through an explicit CPT/SSC/Council model selection process (Jackson, 2025a; Jackson, 2025b; ADF\&G, 2025d).

Management measures in 2025 also demonstrate practical biodiversity safeguards via spatial protections and fishery rules. The 2025/26 Tanner crab season opening included a specified closed area to protect the Pribilof blue king crab stock, illustrating concrete ecosystem/biodiversity protections applied during directed fisheries (ADF\&G, 2025b). []

3.	Management objectives shall be implemented through management rules and actions formulated in a plan or other framework.
	Finally, for Eastern Bering Sea snow crab, 2025 documentation highlights the use of regulatory flexibilities and management adaptations during low abundance conditions as the fishery re-opened after closures, explicitly linking conservation constraints with socioeconomic considerations for communities and processing capacity (NOAA Fisheries, 2025). The 2025/26 TAC-setting discussions also explicitly accounted for unprecedented hybrid Chionoecetes abundance observed in the 2025 survey, reflecting adaptive management in response to changing biological and ecosystem conditions (ADF\&G, 2025a; Rosen, 2025).
References:	Alaska Department of Fish and Game (ADF&G) (2025g) 2025/26 Bering Sea Crab Review of Total Allowable Catch (TAC) (industry meeting presentation, 9 October 2025). Available at: https://www.adfg.alaska.gov/static/fishing/PDFs/commercial/beringaleutian/20252026bsaicrabtacindustrymeeting.pdf Alaska Department of Fish and Game (ADF&G) (2025h) Bering Sea Tanner Crab Season Opens October 15 – Total Allowable Catch Announced (Advisory Announcement, 6 October 2025). Available at: https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1741022333.pdf Alaska Department of Fish and Game (ADF&G) (2025i) 2025/26 Saint Matthew Island Section Blue King Crab Season Closed (Advisory Announcement, 6 October 2025). Available at: https://www.fisheries.noaa.gov/s3/2025-10/10-06-25SMBClosureAAfinal.pdf Alaska Department of Fish and Game (ADF&G) (2025j) 2025/26 Aleutian Islands Golden King Crab Review of TAC (presentation, 27 June 2025). Available at: https://www.adfg.alaska.gov/static/fishing/PDFs/commercial/beringaleutian/20252026aleutiangkingcrabtacreview.pdf Alaska Department of Fish and Game (ADF&G) (2025k) 2025 Board of Fisheries Work Session – North Pacific Fishery Management Council Update (BSAI Crab) (RC011, 28 October 2025). Available at: https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2025-2026/ws/rcs/RC011ADFGNorthPacificFisheryManagementCouncilUpdate.pdf Jackson, T. (2025a) Aleutian Islands Golden King Crab Stock Assessment 2025 (SAFE chapter). North Pacific Fishery Management Council. Available at: https://meetings.npfmc.org/CommentReview/DownloadFile?p=8f50bcad-8229-43cb-a2c9-2a23cd2201fd.pdf&fileName=C2%20AIGKC%20SAFE%20.pdf Jackson, T. (2025b) 2024/25 Stock Status Determination for Aleutian Islands Golden King Crab (status update, August 2025). North Pacific Fishery Management Council. Available at:

3.	Management objectives shall be implemented through management rules and actions formulated in a plan or other framework.

https://meetings.npfmc.org/CommentReview/DownloadFile?p=b3086f51-202f-4d49-a0a5-b45fd527ccc7.pdf&fileName=aigkcstatusdeterminationsept2025.pdf

National Marine Fisheries Service (NMFS) (2025c) Bering Sea and Aleutian Islands Crab Rationalization Cost Recovery Program—Notification of fee percentage. Federal Register notice, 28 July 2025. Available at: https://public-inspection.federalregister.gov/2025-14135.pdf

National Marine Fisheries Service (NMFS) (2025d) Fishing Capacity Reduction Program for the Bering Sea and Aleutian Islands King and Tanner Crab Fisheries—Notice of fee rate adjustment. Federal Register notice, 17 September 2025. Available at: https://public-inspection.federalregister.gov/2025-17920.pdf (Accessed: 6 February 2026).

NOAA Fisheries (2025a) Alaskan Communities Use Flexibility in Snow Crab Fishery Regulations for Economic Relief. 31 March 2025. Available at: https://www.fisheries.noaa.gov/feature-story/alaskan-communities-use-flexibility-snow-crab-fishery-regulations-economic-relief

North Pacific Fishery Management Council (NPFMC) (2025l) C3 Action Memo – BSAI Crab Harvest Specifications. October 2025. Available at: https://meetings.npfmc.org/CommentReview/DownloadFile?p=dbf8c6d9-06b8-4b89-85c9-76ae0b57c6a2.pdf&fileName=C3%20Action%20Memo.pdf

North Pacific Fishery Management Council (NPFMC) (n.d.) BSAI Crab Rationalization Program (webpage). Available at: https://www.npfmc.org/fisheries-issues/fisheries/bsai-crab-allocations/ (Accessed: 6 February 2026).

Palof, K. (2025) Bristol Bay Red King Crab Stock Assessment 2025 (SAFE chapter). North Pacific Fishery Management Council. Available at: https://meetings.npfmc.org/CommentReview/DownloadFile?p=6e6d66b7-d1f0-4aa7-931f-473c278aad85.pdf&fileName=C3%20BBRKC%20SAFE.pdf

Rosen, Y. (2025) 'Gradual improvements in Bering Sea crab stocks allow for Alaska harvest increases'. Alaska Beacon, 7 October 2025. Available at: https://alaskabeacon.com/2025/10/07/gradual-improvements-in-bering-sea-crab-stocks-allow-for-alaska-harvest-increases/

Stern, C.A. and Palof, K. (2025) Saint Matthew Island Blue King Crab update 2025 (SAFE update table, September 2025). North Pacific Fishery Management Council. Available at: https://meetings.npfmc.org/CommentReview/DownloadFile?p=7846221a-4ec4-4e56-bfe8-2951e4e8e17b.pdf&fileName=smbkc25tableupdate.pdf

Stockhausen, W.T. (2025) Tanner Crab SAFE Chapter 2025 (SAFE chapter, September/October 2025). North Pacific Fishery Management Council. Available at:

3.	**Management objectives shall be implemented through management rules and actions formulated in a plan or other framework.**
	https://meetings.npfmc.org/CommentReview/DownloadFile?p=fc07c005-b20d-45b5-94d4-a28e42fca0c5.pdf&fileName=C3%20Tanner%20Crab%20SAFE.pdf
Statement of consistency to the CSI RFM Fishery Standard 2.2	**The fishery continues to conform to the requirements of Fundamental Clause 3 of the CSI RFM Fishery Standard 2.2**

7.8.2. Section B: Science & Stock Assessment Activities, and the Precautionary Approach

7.8.2.1. Fundamental Clause 4. Fishery data

4.	**There shall be effective fishery data (dependent and independent) collection and analysis systems for stock management purposes.**
Summary of relevant changes:	**Clause 4.1:** *All significant fishery removals and mortality of the target species shall be considered by management. Specifically, reliable and accurate data required for assessing the status of fisheries and ecosystems—including data on retained catch, bycatch, discards, and waste—shall be collected. Data can include relevant traditional, fisher, or community knowledge, provided their validity can be objectively verified. These data shall be collected, at an appropriate time and level of aggregation, by relevant management organizations connected with the fishery, and provided to relevant States regional, and international fisheries organizations.* All fishery removals and mortality of the target stocks is considered by management. ADFG undertakes a comprehensive, annual monitoring program to collect data on retained catch, bycatch/discards in all BSAI directed crab fisheries as well as crab bycatch/discards in all groundfish fisheries. There is ongoing annual monitoring of ecosystem conditions that provides a basis for evaluation of impacts on recruitment to BSAI crab stocks of factors other than fishing. A scheme of at-sea and dock-side observers is established to collect accurate data for research and support compliance with applicable fishery management measures. NMFS conducts an annual fishery-independent trawl survey of the eastern Bering Sea to determine the distribution and abundance of crab and groundfish resources. It provides fishery-independent indices of relative stock abundance/biomass, size/sex composition and shell condition for four of the five fisheries under consideration. The AI Golden King crab stock is not covered in this survey. A cooperative AI Golden King crab (pot) survey is carried out annually by the Aleutian Islands King Crab Foundation (an industry group) and ADF&G (for the first time in August 2018) in the EAG (east of 174° W longitude) and WAG (west of 174° W longitude) fisheries, by vessels that were quota fishing (i.e., each vessel fishing an allotted share of total allowable catch). Review of the SAFE reports for the 2025 assessments of each of the BSAI crab fisheries/stocks under consideration in this 3rd audit report showed the full suite of updated data from the ongoing annual monitoring programs described above were included. No further changes to any of the relevant FC 4 supporting clauses detailed in the re-assessment report were identified over the course of the 3rd audit site visit meetings.

4.	There shall be effective fishery data (dependent and independent) collection and analysis systems for stock management purposes.
	Clauses 4.1.1, 4.2, 4.2.1, 4.3, 4.4, 4.5, 4.6 No relevant changes were reported. **Clauses 4.1.2, 4.7, 4.8, 4.9, 4.10, 4.11** Not applicable.
References:	CrabFMP.pdf Stock Assessment (SAFE) Reports | North Pacific Fishery Management Council BSAI Crab Plan Team | North Pacific Fishery Management Council Bering Sea Fishery Ecosystem Plan Team | North Pacific Fishery Management Council North Pacific Observer Program | NOAA Fisheries Alaska Fish Research Surveys | NOAA Fisheries Fisheries Monitoring and Analysis | NOAA Fisheries Commercial Fishing Reporting Resources, Alaska Department of Fish and Game Commercial Fisheries Statistics and Data, Alaska Department of Fish and Game
Statement of consistency to the CSI RFM Fishery Standard	**The fishery continues to meet the requirements of Fundamental Clause 4 of the CSI RFM Fishery Standard 2.2.**

7.8.2.2. Fundamental Clause 5. Stock assessment

5.	There shall be regular stock assessment activities appropriate for the fishery, its range, the species biology, and the ecosystem, undertaken in accordance with acknowledged scientific standards to support its optimum utilization.
Summary of relevant changes:	**Clause 5.1:** *There is an established institutional framework for fishery management purposes that determines applied research needs and use.* A well-organized institutional framework is in place that conducts the research required for fishery management purposes. Results are made available as needed to ensure that the best scientific evidence is used for fisheries conservation, management and development. The BSAI crab fisheries are jointly managed by the North Pacific Fishery Management Council (NPFMC), the National Marine Fisheries Service Alaska Region, BOF and ADFG under the BSAI Fishery Management Plan (FMP). Day-to-day management decisions and enforcement are devolved to the State of Alaska through the ADFG. A requirement of the FMP is the production of an annual stock assessment and fishery evaluation (SAFE) report. For each stock/fishery, the SAFE report provides a detailed description of the data and methodology used in the stock assessment, any changes in

5.	There shall be regular stock assessment activities appropriate for the fishery, its range, the species biology, and the ecosystem, undertaken in accordance with acknowledged scientific standards to support its optimum utilization.
	approaches, the estimated status of the stocks in relation to pre-determined fisheries management reference points, advice on appropriate harvest levels, and an assessment of the relative success of existing state and federal fishery management programs. Results of assessments conducted in 2025 for each of the stocks under consideration are summarized in Sections 7.4.1 to 7.4.5 of this report which also include links to each SAFE report. No further changes to any of the relevant FC 5 supporting clauses detailed in the re-assessment report were identified over the course of the 3rd audit site visit meetings. **Clauses 5.1.1, 5.1.2, 5.2, 5.3, 5.5** No relevant changes were reported. **Clause 5.4** Not applicable.
References:	CrabFMP.pdf Alaska Ecosystem Monitoring and Assessment | NOAA Fisheries Alaska Ecosystem Research | NOAA Fisheries Alaska Fisheries Science Center Divisions and Programs | NOAA Fisheries Home - PICES - North Pacific Marine Science Organization
Statement of consistency to the CSI RFM Fishery Standard 2.2	**The fishery continues to meet the requirements of Fundamental Clause 5 of the CSI RFM Fishery Standard 2.2.**

7.8.2.3. Fundamental Clause 6. Biological reference points and harvest control rule

6.	The current state of the stock shall be defined in relation to reference points, relevant proxies, or verifiable substitutes that allow effective management objectives and targets to be set. Remedial actions shall be available and taken where reference points or other suitable proxies are approached or exceeded.
Summary of relevant changes:	**Clause 6.2:** *A scientifically based limit reference point or proxy has been officially established, and together with the measure to be taken, ensures the reference point(s) will not be exceeded.* **And Clause 6.3:** *Data and assessment procedures (i.e., stock assessment process) are in place to measure the position of the fishery in relation to the target and limit reference points.* Safe limit reference points have been established for exploitation of BSAI crab stocks and measures are in place to ensure fishing mortality is decreased when a limit reference point is approached. The

6.	**The current state of the stock shall be defined in relation to reference points, relevant proxies, or verifiable substitutes that allow effective management objectives and targets to be set. Remedial actions shall be available and taken where reference points or other suitable proxies are approached or exceeded.**	
		biomass that is associated with MSY, BMSY, is effectively treated as the target reference point since it is the desired stock condition but, effective harvest is always lower, consistent with ABC, ACL and TAC formulations, although MSY itself is treated as an upper limit rather than a target reference point because the overfishing limit (OFL) is based upon MSY. The (lower) limit reference point corresponds to 0.5 x BMSY. The harvest rate in the directed fishery is decreased when stock biomass is moving from upper to limit reference point. At stock status level (c), the ratio of current biomass to BMSY (or a proxy for BMSY) is below β (critical biomass threshold), directed fishing is prohibited and an FOFL at or below FMSY would be determined for all other sources of fishing mortality in the development of a rebuilding plan. The stock is considered as overfished if the annual estimated biomass drops below the minimum stock size threshold (MSST). As the annual catch limit (ACL) is never set at a level that would exceed the overfishing level (OFL), the OFL and its associated value of fishing mortality, FOFL, can be considered as limit reference points established for all five crab stocks. As OFL is based upon MSY, then MSY is treated as a limit rather than a target reference point. In fact, ACL (=ABC for crab stocks) is lower than OFL so the limit reference point is actually lower than MSY. The optimum yield (OY), which may range from 0 to <OFL, is also a limit reference point. OY is prescribed on the basis of MSY from the fishery reduced by any relevant social, economic or ecological factor, or in the case of an overfished stock, provides for rebuilding to a level consistent with producing MSY from that fishery. If overfishing has occurred (total catch exceeds OFL) or the stock is overfished (biomass is less than MSST), the Magnuson- Stevens Act (MSA) requires NPFMC to immediately end overfishing and rebuild stocks. The MSA also requires that the FMP includes accountability measures to prevent ACLs from being exceeded and to correct overages if they do occur. Stock status definitions and determination criteria are provided in the introduction to the annual SAFE report (link provided in section 7.4.1). A summary of the status of the BSAI crab stocks under consideration per 2025 assessments follows. **Eastern Bering Sea Snow Crab.** Based on the SSC recommended Tier 4 model, the 2025 stock assessment determined that overfishing is not occurring, however, the stock in 2024/2025 is estimated to be 42% of the B_{MSY}, below the minimum stock size threshold, resulting in an overfished status and snow crab will remain under a rebuilding plan until the stock has rebuilt to the B_{MSY} level. Projected stock size for 2025/2026 is 74% of B_{MSY}. A summary of the 2025 assessment is provided in Section 7.4.1. The minor non-conformity raised in the 1st surveillance audit of the certified BSAI crab fisheries conducted in 2023 remains open as of this 3rd surveillance audit of the 2nd cycle of recertification. Progress against the CAP since the 2024 audit is summarized in non-conformance 2 in Section 8.1.2. **Saint Matthew Blue King Crab.** The SMBKC stock is on a biennial assessment cycle and was last assessed in 2024. In that assessment it was estimated that mature male biomass in 2023/24 was below the MSST, indicating that the stock remains overfished. A directed fishery closure has been in place since the 2016/17 season. Estimated total bycatch has remained well below the overfishing

6.	**The current state of the stock shall be defined in relation to reference points, relevant proxies, or verifiable substitutes that allow effective management objectives and targets to be set. Remedial actions shall be available and taken where reference points or other suitable proxies are approached or exceeded.**	
	level (OFL), hence overfishing has not occurred. A summary of the 2024 assessment along with updated survey information is provided in Section 7.4.2. Progress against the CAP since the 2024 audit is summarized in non-conformance 1 in Section 8.1.2. The non-conformance remains open as of this 3rd surveillance audit of the 2nd cycle of recertification. **Bristol Bay Red King Crab.** Based on the recommended Tier 3 model, the 2025 stock assessment determined that the stock is not overfished and total catch mortality did not exceed the 2024/25 OFL, so overfishing did not occur in 2024/25. Even with recent low recruitment, the BB red king crab stock is not approaching an overfished condition. A summary of results from the 2025 stock assessment for BBRKC is included in Section 7.4.3. **Eastern Bering Sea Tanner Crab.** Based on the recommended Tier 3 model, the 2025 stock assessment determined that the current MMB is above MSST, so the stock is not overfished. The overall catch in 2024/25 was less than the 2024/25 OFL, therefore, overfishing did not occur. A summary of results from the 2025 stock assessment for tanner crab is included in Section 7.4.4. **Aleutian Islands Golden King Crab.** The assessment for AI golden king crab establishes overall stock status by adding the area-specific (east and west of 174◦ W longitude) estimates of current MMB and B_{MSY}. Based on the recommended Tier 3 model, the 2025 stock assessment determined that the total catch in 2024/25 was less than the OFL so, overfishing did not occur, and MMB was 98% B_{MSY}, therefore, the stock is not overfished. A summary of results from the 2025 stock assessment for tanner crab is included in Section 7.4.5. No further changes to any of the relevant FC 6 supporting clauses detailed in the re-assessment report were identified over the course of the 3rd audit site visit meetings. **Clauses 6.1, 6.4, 6.5** No relevant changes were reported.	
References:	Relevant links are provided in 7.8.2.1 (FC 4) and 7.8.2.2 (FC 5) as well as in sections 7.4.1 to 7.4.5.	
Statement of consistency to the CSI RFM Fishery Standard 2.2		**Notwithstanding the 2 open NCs for supporting clause 6.3 , the fishery continues to meet the requirements of Fundamental Clause 6 of the CSI RFM Fishery Standard 2.2**

7.8.2.4. Fundamental Clause 7. Precautionary approach

7.	**Management actions and measures for the conservation of stock and the ecosystem shall be based on the precautionary approach. Where information is deficient a suitable method using risk management shall be adopted to consider uncertainty.**
Summary of relevant changes:	**Clause 7.1:** *The precautionary approach shall be applied widely to conservation, management, and exploitation of ecosystems to protect them and preserve the ecosystem. This should take due account of fishery enhancement procedures, where appropriate. Absence of scientific information shall not be used as a reason for postponing or failing to take conservation and management measures. Relevant uncertainties shall be taken into account through a suitable method of risk management, including those associated with the use of introduced or translocated species.* The precautionary approach is used in the conservation, management, and exploitation of BSAI crab stocks to conserve the resources and preserve their ecosystem. The MSA mandates the development of FMPs for all the federally managed/regulated fisheries. The NPFMC treats OFL (MSY) as an upper limit rather than a target. To account for the uncertainty involved in MSY estimation, catches are in line with the TAC and well below the OFL. Status determination criteria for crab stocks are calculated using a five-tier system that accommodates varying levels of uncertainty of information. The higher the stock tier status, the more conservative the determination of OFL and ABC. The ABC is a level of annual catch that accounts for the scientific uncertainty in the estimate of OFL and any other specified scientific uncertainty and is set to prevent, with a greater than 50 percent probability, the OFL from being exceeded. The system is intrinsically precautionary and based on a comprehensive management process. During the 2023 assessment cycle for BSAI crab stocks, the SSC requested that the CPT take up use of risk tables for crab stocks. These risk tables highlight external factors to the assessment performance across four categories: assessment-related, population dynamics, environmental/ecosystem, and fishery performance along with three levels of concern for each of these categories: normal, increased or extreme. The table highlights potential issues in each of the category/concern combinations that should be considered when applying a buffer to the OFL to determine a recommended ABC. The goal of incorporating the risk table process is to use this tool to organize the information that is currently used in ABC buffer considerations. Risk tables were included in the 2025 SAFE assessment reports for the four stocks under consideration that were assessed in 2025. Discussion of use of risk table analysis in BSAI crab assessments at site visit meetings indicated that their application is currently in preliminary stages. The intention going forward, however, is to more fully integrate risk table analyses in crab assessments. No further changes to any of the relevant FC 7 supporting clauses detailed in the re-assessment report were identified over the course of the 3rd audit site visit meetings. **Clauses 7.1.1, 7.1.2** No relevant changes were reported. **Clause 7.2** Not applicable.
References:	Relevant links are provided in 7.8.2.1 (FC 4) and 7.8.2.2 (FC 5) as well as in sections 7.4.1 to 7.4.5.
Statement of consistency to the CSI RFM Fishery Standard 2.2	**The fishery continues to meet the requirements of Fundamental Clause 7 of the CSI RFM Fishery Standard 2.2.**

7.8.3. Section C: Management Measures, Implementation, Monitoring, and Control

7.8.3.1. Fundamental Clause 8. Management measures

8.	**Management shall adopt and implement effective management measures designed to maintain stocks at levels capable of producing maximum sustainable yields, including harvest control rules and technical measures applicable to sustainable utilization of the fishery, and based upon verifiable evidence and advice from available objective scientific and traditional sources.**
Summary of relevant changes:	**Clause 8.1:** *Conservation and management measures shall be designed to ensure the long-term sustainability of fishery resources at levels which promote optimum utilization, and are based on verifiable and objective scientific and/or traditional, fisher, or community sources.* The NPFMC's FMP for BSAI crab fisheries is designed to maintain stocks at MSY levels. The main harvest control rule sets a limit on the annual catch that is based on an assessment of stock status against overfishing and overfished criteria and determines the overfishing level (OFL= MSY) and allowable biological catch (ABC). The ABC is a level of annual catch that accounts for the scientific uncertainty in the estimate of OFL and is set to prevent the OFL from being exceeded (further details included in 7.8.2.3 – FC 6 and 7.8.2.4 – FC 7). In addition to catch limits, there are many other measures in place aimed at sustainable use of the crab resources. These include minimum legal size limitations based primarily on biological considerations. MLSs are set at sizes larger than size at 50% male maturity to ensure opportunity to mate before becoming vulnerable to the fishery. Female crabs cannot be retained unless a surplus is confirmed to be available. However, industry has shown little interest because females are smaller than males of the same age and have a lower meat yield than males of the same size. To enhance population reproductive potential, closed fishing seasons have been established to protect crabs during the molting and mating stages of their life cycle. Use of trawls and entanglement gear is specifically prohibited because of significant mortality that can be imposed on nonlegal crab. Pots and ring nets are the only commercial fishing gear permitted. Escape mechanisms must be incorporated in pots to allow female and sublegal male crab to escape prior to hauling. To reduce handling mortality, any undersized males and females that are caught must be released as soon as possible following removal from pots. To prevent ghost fishing by lost pots, biodegradable twine must be incorporated on all pots to allow escapement. When needed, pot limits may be applied to achieve ecological, economic, or social objectives of the FMP. The FMP must also identify Essential Fish Habitat (EFH) for each of the different crab species to include ecological and biological needs for each stage of the life cycle. To the degree practical, measures are taken to minimize adverse effects of fishing and to maintain and enhance EFH. These measures include designated areas closed to all fishing as well as other areas where the use of mobile bottom contact gear is prohibited. No changes to any of the relevant FC 8 supporting clauses detailed in the re-assessment report were identified over the course of the 3rd audit site visit meetings. **Clauses 8.1.1, 8.1.2, 8.2, 8.3, 8.4, 8.4.1, 8.5, 8.5.1, 8.6, 8.7, 8.8, 8.9, 8.11, 8.12** No relevant changes were reported. **Clauses 8.10, 8.13** Not applicable.

8.	**Management shall adopt and implement effective management measures designed to maintain stocks at levels capable of producing maximum sustainable yields, including harvest control rules and technical measures applicable to sustainable utilization of the fishery, and based upon verifiable evidence and advice from available objective scientific and traditional sources.**
References:	National Environmental Policy Act | US EPA Alaska Crab Bycatch | NOAA Fisheries Restricted Access Management Division | NOAA Fisheries BSAI Crab Rationalization Program | North Pacific Fishery Management Council Commercial Fishing Regulations, Alaska Department of Fish and Game Additional relevant links are provided in 7.8.2.1 (FC 4) and 7.8.2.2 (FC 5) as well as in sections 7.4.1 to 7.4.5.
Statement of consistency to the CSI RFM Fishery Standard	**The fishery continues to meet the requirements of Fundamental Clause 8 of the CSI Fishery Standard 2.2.**

7.8.3.2. Fundamental Clause 9. Appropriate standards of fishers' competence

9.	**Fishing operations shall be carried out by fishers with appropriate standards of competence in accordance with international standards, guidelines and regulations.**
Summary of relevant changes:	9.1./9.2./9.3. Education and training programs. In 2025, BSAI crab fishery management continued to implement structured education and compliance-communication mechanisms that support fisher competency, safe operations, and correct implementation of management measures. Fishery participation announcements for Bristol Bay red king crab, Bering Sea Tanner crab, Bering Sea snow crab, and Aleutian Islands golden king crab explicitly required operational prerequisites linked to competency and safety (e.g., a valid USCG Commercial Fisheries Vessel Safety Decal and NMFS-approved VMS), reinforcing that fishers must meet and maintain recognized safety and compliance standards as a condition of participation (ADF&G, 2025b; ADF&G, 2025c; ADF&G, 2025d; ADF&G, 2025e). Preseason communications for the 2025/26 Bristol Bay red king crab, Tanner crab, and snow crab fisheries provided fishery-specific instructions on observer coverage planning and explicitly linked failure to meet logistical/notice requirements to potential enforcement action, evidencing practical compliance training and reinforcement mechanisms (ADF&G, 2025a). Education and compliance assistance were further evidenced through NOAA OLE Alaska Division reporting in 2025, which describes enforcement patrols conducted for both enforcement and educational purposes and coordination with partner agencies (NOAA OLE, 2025). Reporting training/education resources were maintained and updated in 2025 through the Interagency Electronic Reporting System documentation (eLandings FAQ updated Feb 2025), supporting correct reporting for crab IFQ/CDQ landings and related requirements (eLandings, 2025; NOAA Fisheries, n.d.). Finally, ADF&G continues to require that fish tickets (paper or eLandings-generated) be submitted within 7 days of landing/first purchase, reinforcing documentation, accountability and compliance expectations for legally harvested crab (ADF&G, n.d.). Together, these 2025 elements provide

9.	**Fishing operations shall be carried out by fishers with appropriate standards of competence in accordance with international standards, guidelines and regulations.**
	auditable evidence of ongoing education/training and competency-support mechanisms consistent with CSI RFM v2.2 clauses 9.1–9.3
References:	ADF&G n.d. Fish Tickets: Commercial Fishing Reporting (webpage). Available at: https://www.adfg.alaska.gov/index.cfm?adfg=fishlicense.fishtickets ADF&G 2025a 2025/26 Preseason Vessel Registration for Bristol Bay Red King Crab, Eastern and Western Bering Sea Tanner Crab, and Bering Sea Snow Crab Fisheries (Advisory Announcement, 11 August 2025). Available at: https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1724191206.pdf ADF&G 2025b Bristol Bay Red King Crab Season Opens October 15 – Total Allowable Catch Announced (Advisory Announcement, 6 October 2025). Available at: https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1740916530.pdf ADF&G 2025c Bering Sea Tanner Crab Season Opens October 15 – Total Allowable Catch Announced (Advisory Announcement, 6 October 2025). Available at: https://www.fisheries.noaa.gov/s3/2025-10/10-06-25_BST_TAC_AA_final.pdf ADF&G 2025d Bering Sea Snow Crab Season Opens October 15 – Total Allowable Catch Announced (Advisory Announcement, 6 October 2025). Available at: https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1741176837.pdf ADF&G 2025e Aleutian Islands Golden King Crab Total Allowable Catch and Season Dates Announced (Advisory Announcement, 20 June 2025). Available at: https://www.fisheries.noaa.gov/s3/2025-07/aleutian-crab-tac-2025_0.pdf ADF&G 2025f 2025/26 Saint Matthew Island Section Blue King Crab Season Closed (Advisory Announcement, 6 October 2025). Available at: https://www.fisheries.noaa.gov/s3/2025-10/10-06-25_SMB_Closure_AA_final.pdf eLandings 2025 eLandings Reporting System FAQs (updated 3 February 2025). Available at: https://elandings.atlassian.net/wiki/spaces/doc/pages/79659055/eLandings+Reporting+System+FAQ+s NOAA Fisheries n.d. Electronic Reporting in Alaska Fisheries (webpage). Available at: https://www.fisheries.noaa.gov/alaska/resources-fishing/electronic-reporting-alaska-fisheries NOAA OLE 2025 NOAA OLE Alaska Division Report to the NPFMC (December 2025). Available at: https://meetings.npfmc.org/CommentReview/DownloadFile?p=ddaf96fe-32fc-4b14-a044-9cf3cd5f4b51.pdf&fileName=B5%20NOAA%20OLE%20Report.pdf
Statement of consistency to the CSI RFM Fishery Standard 2.2	**The fishery continues to meet the requirements of Fundamental Clause 9 of the CSI Fishery Standard 2.2.**

7.8.3.3. Fundamental Clause 10. Effective legal and administrative framework

10.	**An effective legal and administrative framework shall be established, and compliance ensured, through effective mechanisms for monitoring, surveillance, control, and enforcement for all fishing activities within the jurisdiction.**
Summary of relevant changes:	10.1. Enforcement agencies and framework: Enforcement information for the BSAI commercial crab fisheries indicates a high level of compliance in 2024. USCG boarding records for the reporting period (01 Jan 2024–02 Dec 2025, including CY2024) show boardings in Bristol Bay red king crab (9), Tanner crab (1), and Aleutian Islands golden king crab (2), with no boardings recorded for East Bering Sea snow crab or St. Matthew Island blue king crab; USCG reported zero safety violations and one fisheries violation (improper retention of Pacific halibut for use as bait: 1), and no gear loss was observed or reported. NOAA's Office of Law Enforcement (OLE) maintained an active compliance and monitoring presence across the Bering Sea and Aleutian Islands (BSAI) crab fisheries. Over the course of the year, OLE officers conducted five at-sea boardings of commercial crab vessels operating in the region. These boardings supported verification of vessel monitoring system (VMS) operability, gear configuration, recordkeeping accuracy, and adherence to area and permit restrictions. In addition to at-sea operations, OLE opened 29 enforcement incidents related to potential violations within the BSAI crab sector. Of these, 16 incidents were closed after review, with determinations of either no violation or no further action required by OLE. The remaining 13 incidents resulted in documentation of 17 distinct violations, spanning multiple fisheries and violation types(See Appendix 3). The violations recorded in 2024 reflected a mix of administrative, operational, and prohibited-species issues. Several cases involved failure to maintain operable VMS units, improper gear marking, and recordkeeping and reporting deficiencies, which were generally addressed through compliance assistance or summary settlements. Other cases involved more serious conduct, including illegal possession of groundfish and illegal possession of prohibited species, both of which resulted in seizures and, in some instances, summary settlements. Violations were distributed across multiple crab fisheries, including Bristol Bay red king crab (BBRKC), Aleutian Islands golden king crab (AIGKC), Norton Sound red king crab (NSRKC), and Western/Eastern Bering Sea Tanner crab (WBT–EBT). Enforcement actions ranged from compliance assistance, closed letters of enforcement (LOEs), and summary settlements, to seizures and referrals for further review when warranted. Overall, the CY2024 enforcement profile demonstrates active monitoring by OLE, a continued emphasis on voluntary compliance through education and corrective guidance, and targeted enforcement responses where violations posed risks to resource protection, accurate reporting, or fishery integrity. AWT 2024 enforcement data similarly supports very high compliance: patrol coverage was limited in some fisheries (snow crab and Aleutian Islands golden king crab, where enforcement relied on dockside boardings), while in Bristol Bay red king crab the PV Stimson inspected 100 pots across 20 vessels and observed no gear violations and conducted eight boardings; across open fisheries AWT reported 98 boardings (with additional boardings likely untracked due to missing slips) and issued a small number of citations relevant to these fisheries, including gear requirements (3 citations; 5 AAC 35.525(b)(1)), fish ticket submission/accuracy (2 citations; 5 AAC 39.130(c) and 5 AAC 39.130(c)(9)),

10.	**An effective legal and administrative framework shall be established, and compliance ensured, through effective mechanisms for monitoring, surveillance, control, and enforcement for all fishing activities within the jurisdiction.**
	and escape mechanism requirements (1 citation; 5 AAC 39.145(1)); overall, AWT reported no compliance concerns. Fishery-specific 2024 State season announcements for Bristol Bay red king crab, Bering Sea Tanner crab, Bering Sea snow crab, and Aleutian Islands golden king crab reiterated enforceable participation controls that directly support monitoring and compliance verification, including requirements for a valid USCG Commercial Fisheries Vessel Safety Decal and an NMFS-approved Vessel Monitoring System (VMS) as conditions of registration and participation (ADF&G, 2024b; ADF&G, 2024c; ADF&G, 2024d; ADF&G, 2024e). Preseason monitoring arrangements for the 2024/25 Bristol Bay red king crab, Tanner crab, and snow crab fisheries further reinforced the operational enforcement framework by linking compliance with observer logistics requirements to potential "enforcement action" (ADF&G, 2024a). For St. Matthew Island blue king crab, the 2024/25 directed fishery remained closed—an enforceable access control—with federal CR/OLE contact points provided in the closure notice (ADF&G, 2024f). Collectively, these 2024 sources provide auditable evidence of a functioning enforcement agency framework with active implementation across the assessed crab fisheries. In calendar year 2025, enforcement of BSAI crab fisheries continued to be implemented through an operational framework led by NOAA Fisheries' Office of Law Enforcement (OLE) with substantial use of cooperative enforcement partners, including the U.S. Coast Guard (USCG) and Alaska Wildlife Troopers (AWT), consistent with CSI RFM v2.2 expectations for effective monitoring, control and enforcement (CSI, 2025; RFM, 2024). NOAA OLE Alaska Division reporting for FY2025 (including April–September 2025 operations) documents active enforcement presence through dockside and at-sea patrols and boardings, detection of violations (including permit-related violations), and catch seizure, and explicitly describes routine coordination with partners such as USCG and AWT to broaden enforcement coverage (NOAA OLE, 2025a). Fishery-specific 2025 notices for Bristol Bay red king crab, Bering Sea Tanner crab, Bering Sea snow crab, and Aleutian Islands golden king crab reiterated enforceable participation controls that directly support monitoring and compliance verification, including requirements for a valid USCG Commercial Fisheries Vessel Safety Decal and NMFS-approved Vessel Monitoring System (VMS) as conditions of registration/participation (ADF&G, 2025b; ADF&G, 2025c; ADF&G, 2025d; ADF&G, 2025e). Preseason monitoring arrangements for the 2025/26 Bristol Bay red king crab, Tanner crab, and snow crab fisheries further reinforced the operational enforcement framework by linking compliance with observer logistics requirements to potential "enforcement action" (ADF&G, 2025a). For St. Matthew Island blue king crab, the 2025/26 directed fishery remained closed (an enforceable access control), with federal CR/OLE contact points provided in the closure notice (ADF&G, 2025f). Collectively, these 2025 sources provide auditable evidence of a functioning enforcement agency framework with active implementation across the assessed crab fisheries

10.	An effective legal and administrative framework shall be established, and compliance ensured, through effective mechanisms for monitoring, surveillance, control, and enforcement for all fishing activities within the jurisdiction.
	10.2./10.3/10.4. Fishing permit requirements: In calendar year 2025, BSAI crab permit requirements continued to be implemented through a structured federal permitting framework that requires explicit authorization for participation and provides verifiable, enforceable controls. Under the Crab Rationalization (CR) regulations, participants must possess required permits, Federal crab vessel permits are issued annually, are not transferable, and must be produced upon request of an authorized officer (NMFS, 2025b). A Federal Crab Vessel Permit (FCVP) remains a core authorization for vessels participating in BSAI crab rationalization fisheries; FCVPs are annual (crab fishing year July 1–June 30) and must be onboard at all times, and only U.S. citizens may hold them (NMFS, 2023). Equipment and operational requirements explicitly link VMS obligations to CR participation and FCVP status, requiring VMS carriage/use and transmitter operation when the vessel has crab pot gear and has or is required to have a Federal crab vessel permit (NMFS, 2026a; NOAA Fisheries, 2026b). Permit issuance is actively administered on an annual cycle, as evidenced by NMFS' 2025 Annual Crab IFQ application reminder (deadline June 15, 2025; late applications denied) and the statement that IFQ permits for 2025/26 are issued after TACs are announced and after verification of required EDRs/fee liabilities (NMFS, 2025a). In addition to CR permits, LLP licensing requirements remain applicable: as documented in program materials updated in 2025, an LLP license has been required since January 1, 2000 for vessels fishing in any BSAI LLP crab fisheries, and a vessel must be named on an original LLP license onboard the vessel (NOAA Alaska Region, 2025a; NOAA Fisheries, 2025a). Fishery-specific 2025 State season announcements for Bristol Bay red king crab, Bering Sea Tanner crab, Bering Sea snow crab, and Aleutian Islands golden king crab reiterated enforceable participation prerequisites (including NMFS-approved VMS and USCG safety documentation and state permit card presence), providing fishery-level evidence that authorization requirements are checked at registration and during fishing operations (ADF&G, 2025a; ADF&G, 2025b; ADF&G, 2025c; ADF&G, 2025d).
References:	ADF&G 2024a. 2024/2025 Preseason Observer and Monitoring Requirements for BBRKC, Tanner Crab, and Snow Crab. Alaska Department of Fish and Game, Division of Commercial Fisheries, Juneau, AK. ADF&G 2024b. 2024/2025 Bristol Bay Red King Crab Season Announcement. Alaska Department of Fish and Game, Division of Commercial Fisheries, Juneau, AK. https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1550674120.pdf

10.	**An effective legal and administrative framework shall be established, and compliance ensured, through effective mechanisms for monitoring, surveillance, control, and enforcement for all fishing activities within the jurisdiction.**

ADF&G 2024c. 2024/2025 Bering Sea Tanner Crab Season Announcement. Alaska Department of Fish and Game, Division of Commercial Fisheries, Juneau, AK. https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1550674121.pdf

ADF&G 2024d. 2024/2025 Eastern Bering Sea Snow Crab Season Announcement. Alaska Department of Fish and Game, Division of Commercial Fisheries, Juneau, AK. https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1550674122.pdf

ADF&G 2024e. 2024/2025 Aleutian Islands Golden King Crab Season Announcement. Alaska Department of Fish and Game, Division of Commercial Fisheries, Juneau, AK. https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1550674123.pdf

ADF&G .2024f. 2024/2025 St. Matthew Island Blue King Crab Closure Notice. Alaska Department of Fish and Game, Division of Commercial Fisheries, Juneau, AK. https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1550674124.pdf

ADF&G 2025a 2025/26 Preseason Vessel Registration for Bristol Bay Red King Crab, Eastern and Western Bering Sea Tanner Crab, and Bering Sea Snow Crab Fisheries (Advisory Announcement, 11 August 2025). Available at: https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1724191206.pdf

ADF&G 2025b Bristol Bay Red King Crab Season Opens October 15 – Total Allowable Catch Announced (Advisory Announcement, 6 October 2025). Available at: https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1740916530.pdf

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ADF&G 2025e Aleutian Islands Golden King Crab Total Allowable Catch and Season Dates Announced (Advisory Announcement, 20 June 2025). Available at: https://www.fisheries.noaa.gov/s3/2025-07/aleutian-crab-tac-2025_0.pdf

ADF&G 2025f 2025/26 Saint Matthew Island Section Blue King Crab Season Closed (Advisory Announcement, 6 October 2025). Available at: https://www.fisheries.noaa.gov/s3/2025-10/10-06-25_SMB_Closure_AA_final.pdf

NMFS 2023 Application for a Federal Crab Vessel Permit (FCVP) (Alaska Region RAM form; revised 27 April 2023). Available at: https://s3.amazonaws.com/media.fisheries.noaa.gov/dam-migration/application-for-a-federal-crab-vessel-permit-fcvp-akro-noaa-fisheries.pdf

10.	An effective legal and administrative framework shall be established, and compliance ensured, through effective mechanisms for monitoring, surveillance, control, and enforcement for all fishing activities within the jurisdiction.
	NMFS 2025a 2025 Annual Crab IFQ Application Reminder (NMFS Alaska Region bulletin, 15 May 2025). Available at: https://content.govdelivery.com/accounts/USNOAAFISHERIES/bulletins/3e0a68e NMFS 2025b 50 CFR § 680.4 — Permits (eCFR). Available at: https://www.ecfr.gov/current/title-50/chapter-VI/part-680/subpart-A/section-680.4 NOAA OLE 2025a NOAA OLE Alaska Division Report to the NPFMC (December 2025). Available at: https://meetings.npfmc.org/CommentReview/DownloadFile?p=ddaf96fe-32fc-4b14-a044-9cf3cd5f4b51.pdf&fileName=B5%20NOAA%20OLE%20Report.pdf
Statement of consistency to the CSI RFM Fishery Standard 2.2	**The fishery continues to meet the requirements of Fundamental Clause 10 of the CSI Fishery Standard 2.2.**

7.8.3.4. Fundamental Clause 11. Framework for sanctions

11.	There shall be a framework for sanctions for violations and illegal activities of adequate severity to support compliance and discourage violations.
Summary of relevant changes:	11.1 States laws of adequate severity shall be in place that provide for effective sanctions. Fisheries laws applicable to the BSAI crab fisheries provide an escalating and enforceable sanctions framework consistent with CSI RFM Fisheries Standard v2.2 expectations that sanctions support compliance and deter violations. The Magnuson-Stevens Act enforcement policy codified at 50 CFR §600.740 sets out four core enforcement remedies in ascending order of severity—(1) issuance of a citation, (2) assessment of a civil monetary penalty, (3) judicial forfeiture action against a vessel and its catch for certain violations, and (4) criminal prosecution for some offences—confirming that legally available sanctions range from warnings through criminal enforcement (NMFS, 2025a). The same provision further confirms NOAA's authority to pursue other remedies if later review shows the initial penalty is inadequate, and it explicitly authorizes permit sanctions (and in some cases requires them) even if civil or criminal actions are also pursued, recognizing permit sanctions as serving a distinct purpose from monetary or criminal penalties (NMFS, 2025a). NOAA's "Policy for the Assessment of Civil Administrative Penalties and Permit Sanctions" (Penalty Policy), effective 24 June 2019, provides national-level guidance to ensure that civil administrative penalties and permit sanctions are applied fairly and consistently, are proportionate to the gravity of violations, are sufficient to deter violators and the regulated community, eliminate economic incentives for non-compliance, and achieve compliance expeditiously to protect natural resources (NOAA, 2019a). The 2019 Penalty Policy explicitly notes that it reflects post-2014 legislative/regulatory changes, including the Illegal, Unreported, and Unregulated Fishing Enforcement Act of 2015 and updated maximum civil monetary penalties, and it supersedes prior NOAA penalty/permit sanction schedules and guidance (NOAA, 2019a). NOAA also provided public

11.	There shall be a framework for sanctions for violations and illegal activities of adequate severity to support compliance and discourage violations.

notice and comment opportunity on the 2019 revisions via Federal Register publication, supporting transparency and predictability in enforcement (NOAA, 2019b). In parallel, deterrence is supported through routine inflation adjustment mechanisms for civil monetary penalties within Department of Commerce jurisdiction (15 CFR Part 6), helping ensure penalty ceilings retain their real-value effect over time (DOC, 2024a).

In year 2025, fishery-specific implementation evidence demonstrates that these sanctions are operationally actionable (not merely available in statute) through enforceable entry conditions and monitoring controls in the BSAI crab fisheries. For Bristol Bay red king crab, the 2025/26 season announcement requires a valid USCG Commercial Fisheries Vessel Safety Decal before registration, an activated NMFS-approved vessel monitoring system (VMS), and at least 24-hour USCG notification prior to departing port when carrying crab pot gear—requirements that are verifiable and enforceable as conditions of participation (ADF&G, 2025a). Equivalent enforceable participation conditions (USCG safety decal and NMFS-approved VMS as prerequisites) are reiterated in 2025/26 season announcements for Bering Sea Tanner crab and Bering Sea snow crab, alongside enforceable registration constraints and area-based restrictions that support compliance monitoring (ADF&G, 2025b; ADF&G, 2025c). For Aleutian Islands golden king crab, the 2025/26 TAC/season announcement similarly requires USCG safety decal, NMFS-approved VMS, and 24-hour USCG notification prior to departure, reinforcing consistent enforceable controls across BSAI crab fisheries (ADF&G, 2025d). A particularly direct 2025 linkage between monitoring requirements and sanctions is included in ADF&G's 2025/26 preseason vessel registration/observer coverage notice for Bristol Bay red king crab, Tanner crab, and snow crab, which states that failure to provide the required advance notice may delay fishing operations or result in enforcement action—explicitly connecting non-compliance to enforceable consequences (ADF&G, 2025e). For St. Matthew Island blue king crab, the 2025/26 directed fishery remained closed (an enforceable access control), and the closure advisory provides federal CR/OLE points of contact supporting enforceability even in closed years (ADF&G, 2025f).

11.2 Sanctions applicable to violations and illegal activities shall be adequate in severity to be effective in securing compliance and discouraging violations wherever they occur. Sanctions shall also be in force to affect authorization to fish and/or to serve as masters or officers of a fishing vessel in the event of non-compliance with conservation and management measures.

Sanctions applicable to violations and illegal activities in the U.S. EEZ are adequate in severity to secure compliance and discourage violations, and sanctions are in force to affect authorization to fish and/or to serve as masters or officers of a fishing vessel. The Magnuson-Stevens enforcement policy provides an escalating remedy ladder (citation/warning, civil monetary penalties, forfeiture, and criminal prosecution) and explicitly provides for permit sanctions (including circumstances where permit sanctions are required), establishing both monetary and access-based deterrents (NMFS, 2025a). NOAA's Penalty Policy (effective 24 June 2019) operationalizes penalty and permit-sanction assessment to ensure proportionality to gravity, deterrence, removal of economic incentives for non-compliance, and rapid achievement/maintenance of compliance (NOAA, 2019a), and the

11.	There shall be a framework for sanctions for violations and illegal activities of adequate severity to support compliance and discourage violations.

revisions were subject to public notice/comment, supporting transparency and predictability (NOAA, 2019b).

A particularly relevant 2025 update for Clause 11.2 is the continued, documented use and maintenance of "Summary Settlement/Fix-it" sanction schedules, which allow immediate or near-immediate settlement outcomes for certain violations and thereby strengthen deterrence and compliance outcomes. NOAA maintains Summary Settlement/Fix-it schedules (including a National schedule and region-specific schedules) and the Summary Settlement schedule resources were maintained and updated online (page updated in 2025), supporting operational availability of immediate penalties (NOAA, 2025e). The National Summary Settlement/Fix-it schedule specifies monetary amounts and escalation for repeated offences for a range of violations relevant to crab fisheries and associated monitoring/control tools (e.g., VMS violations, observer interference, closed-area prohibitions, USCG safety exam proof, and observer accommodations/safety), demonstrating that penalties are designed to be sufficiently severe to deter and to escalate with repeat violations (NOAA, 2025f). For Alaska specifically, the Alaska Region Summary Settlement & Fix-it schedule includes sanctions and escalations that directly affect "authorization to fish" and "authorization to serve as master/officer" by penalizing fishing/processing without valid LLP/scallop/crab permits and by penalizing "hired master not on named vessel" and "permit holder not on vessel," including monetary penalties and, in several cases, forfeiture of unlawful catch or payment of fair market value—precisely matching Clause 11.2's requirement that sanctions be in force to affect who may fish and who may serve in vessel leadership roles (NOAA, 2025g). In addition, NOAA provides a formal payment mechanism for OLE Summary Settlement penalties, demonstrating practical implementation of immediate settlement sanctions (U.S. Treasury/Pay.gov, 2026).

Calendar year 2025 fishery-specific BSAI crab management communications provide further evidence that enforceable conditions and monitoring systems support compliance and enable sanctioning. For Bristol Bay red king crab (BBRKC), the 2025/26 season announcement conditions participation on compliance requirements such as an NMFS-approved VMS, a valid USCG Commercial Fisheries Vessel Safety Decal, and ≥24-hour USCG notice prior to departure with crab pot gear—requirements that are verifiable and enforceable and therefore support compliance and deterrence (ADF&G, 2025a). Equivalent enforceable participation controls are reiterated in 2025/26 announcements for Bering Sea Tanner crab and Bering Sea snow crab (e.g., VMS and USCG safety decal prerequisites and fishery registration constraints), demonstrating consistent compliance conditions across crab fisheries (ADF&G, 2025b; ADF&G, 2025c). For Aleutian Islands golden king crab (AIGKC), the 2025/26 season announcement similarly requires USCG safety decal, NMFS-approved VMS, and ≥24-hour USCG notification, reinforcing enforceable participation conditions across BSAI crab fisheries (ADF&G, 2025d). For St. Matthew Island blue king crab (SMBKC), the 2025/26 directed fishery remained closed, which is itself an enforceable access control; the closure advisory includes federal CR/OLE contact points, supporting enforceability even where directed fishing is not authorized (ADF&G, 2025f). Importantly, an explicit 2025 enforcement linkage is provided in ADF&G's preseason vessel registration/observer coverage notice for BBRKC, Tanner crab, and snow crab, which states that failure to provide required advance notice may delay fishing operations or result in enforcement

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action—directly supporting the Clause 11.2 expectation that sanctions are effective in securing compliance (ADF&G, 2025e).

Finally, 2025 evidence from enforcement reporting supports that sanctions and enforcement mechanisms are actively applied. NOAA OLE's Alaska Division report to the North Pacific Fishery Management Council for FY2025 (April–September 2025) documents dockside and at-sea patrols, boardings, violations detected (including permit-related violations) and catch seizure, and highlights routine coordination with partners such as the USCG and Alaska Wildlife Troopers—demonstrating practical enforcement presence and the ability to detect and respond to violations (NOAA OLE, 2025b). NOAA also maintains a national enforcement hotline for reporting suspected violations, supporting public/industry collaboration to discourage illegal activities and improve compliance outcomes (NOAA OLE, 2025b; NOAA Fisheries, 2026).

11.3 Fisheries management organizations shall ensure that sanctions for IUU fishing by vessels and, to the greatest extent possible, nationals under its jurisdiction are of sufficient severity to effectively prevent, deter, and eliminate IUU fishing and to deprive offenders of the benefits accruing from such fishing. This may include the adoption of a civil sanction regime based on an administrative penalty scheme. Fisheries management organizations shall ensure the consistent and transparent application of sanctions.

Management authorities for Alaska BSAI crab fisheries maintain a transparent administrative sanction regime and apply sanctions of sufficient severity to prevent, deter, and eliminate IUU fishing and to deprive offenders of benefits. All commercial crab landings are documented through Alaska's fish ticket system and/or eLandings (which generates a printable ADF&G fish ticket), and fish tickets must be completed and submitted within 7 days of landing and/or first purchase, supporting traceability and reducing opportunities for IUU product to enter legal supply chains (ADF&G, 2026; ADF&G, 2006). eLandings is the interagency electronic reporting system used to report IFQ/CDQ crab and associated production/landing data to multiple agencies, improving data quality and timeliness and supporting enforcement and auditability of landings (NOAA Fisheries, 2026a; eLandings, 2026).

Sanctions that deprive offenders of benefits are embedded in Alaska's Fish and Game Code: strict liability commercial fishing penalties include mandatory forfeiture of fish (or fair market value) taken/retained in violation, in addition to escalating fines for repeat convictions (State of Alaska, 2025a), and misdemeanor commercial fishing penalties provide for fines and imprisonment and authorize forfeiture of fish (or value) and, in appropriate cases, forfeiture of vessel and fishing gear, including provisions for additional fines tied to the gross value of fish for serious violations (State of Alaska, 2025b). These provisions directly support deprivation of economic benefits from illegal fishing and strengthen deterrence against IUU-related conduct (State of Alaska, 2025a; State of Alaska, 2025b).

11.	There shall be a framework for sanctions for violations and illegal activities of adequate severity to support compliance and discourage violations.
	At the federal level, NOAA's Penalty Policy provides a nationally consistent and transparent administrative penalty scheme for civil administrative penalties and permit sanctions, explicitly aiming to ensure proportionality to violation gravity, deterrence across the regulated community, elimination of economic incentives for non-compliance, and expeditious compliance to protect natural resources (NOAA, 2019a). The policy revisions were publicly noticed for comment, supporting transparency in enforcement approaches (NOAA, 2019b). NOAA also maintains published Summary Settlement/Fix-it schedules (including National and Alaska schedules) that specify monetary penalty amounts and escalation for repeat offenses, supporting consistent application of sanctions for common violations (NOAA, 2025a). The Alaska Region Summary Settlement & Fix-it schedule includes penalties for permit/authorization violations and for actions that undermine accountability (e.g., fishing/processing/receiving without required limited entry/crab permits, and penalties linked to unlawful catch/value), further supporting benefit-deprivation objectives relevant to IUU deterrence (NOAA, 2025b). Calendar year 2025 fishery notices for Bristol Bay red king crab, Bering Sea snow crab, Bering Sea Tanner crab, and Aleutian Islands golden king crab reinforce enforceable participation controls that support IUU deterrence and accountability (e.g., NMFS-approved VMS and USCG safety requirements/notifications as conditions of participation), strengthening monitoring capacity and the ability to detect and act on non-compliant activity (ADF&G, 2025a; ADF&G, 2025b; ADF&G, 2025c; ADF&G, 2025d). ADF&G's 2025 preseason registration/observer coverage notice explicitly links non-compliance with monitoring requirements to "enforcement action," supporting the conclusion that sanctions are actively used to secure compliance (ADF&G, 2025e). For St. Matthew Island blue king crab, the 2025/26 directed fishery remained closed (an enforceable authorization control), and the closure notice includes federal CR/OLE contacts, supporting enforceability even during closure periods (ADF&G, 2025f). Active enforcement is evidenced by NOAA OLE Alaska Division reporting in 2025 documenting patrols, boardings, violations detected (including permit-related violations), and catch seizure, with extensive partner coordination, supporting practical capacity to deter and eliminate illegal activity and deprive benefits through seizures/forfeiture pathways (NOAA OLE, 2025).
References:	ADF&G 2006 'Fish Tickets Fishery Database is the Envy of the Industry'. Alaska Fish & Wildlife News, October. Available at: https://www.adfg.alaska.gov/index.cfm?adfg=wildlifenews.view_article&articles_id=246 ADF&G n.d. Fish Tickets: Commercial Fishing Reporting (webpage). Available at: https://www.adfg.alaska.gov/index.cfm?adfg=fishlicense.fishtickets ADF&G 2025a 2025/26 Preseason Vessel Registration for Bristol Bay Red King Crab, Eastern and Western Bering Sea Tanner Crab, and Bering Sea Snow Crab Fisheries (Advisory

11.	There shall be a framework for sanctions for violations and illegal activities of adequate severity to support compliance and discourage violations.

Announcement, 11 August 2025).Available at: https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1724191206.pdf

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NMFS 2025a 50 CFR § 600.740 — Enforcement policy (eCFR). Available at: https://www.ecfr.gov/current/title-50/chapter-VI/part-600/subpart-H/section-600.740

NOAA 2019a Policy for the Assessment of Civil Administrative Penalties and Permit Sanctions (effective 24 June 2019).Available at: https://www.gc.noaa.gov/documents/Penalty-Policy-FINAL-June242019.pdf

NOAA 2019b Revisions to NOAA's Policy for the Assessment of Civil Administrative Penalties and Permit Sanctions (notice of availability; request for comments). Federal Register, 84 FR 18808 (2 May 2019). Available at: https://www.federalregister.gov/documents/2019/05/02/2019-08895/revisions-to-noaas-policy-for-the-assessment-of-civil-administrative-penalties-and-permit-sanctions

NOAA 2024 Enforcement Section (webpage).Available at: https://www.noaa.gov/general-counsel/gc-enforcement-section

11.	There shall be a framework for sanctions for violations and illegal activities of adequate severity to support compliance and discourage violations.
	NOAA 2025a Documents – Summary Settlement/Fix It Schedules (webpage).Available at: https://www.noaa.gov/general-counsel/gc-resources/gc-documents/documents-summary-settlementfix-it-schedules NOAA 2025b 15 CFR Part 904, Subpart A — General (eCFR). Available at: https://www.ecfr.gov/current/title-15/subtitle-B/chapter-IX/subchapter-A/part-904/subpart-A NOAA 2025c 15 CFR Part 904, Subpart B — Civil Penalties (NOVA procedures) (eCFR). Available at: https://www.ecfr.gov/current/title-15/subtitle-B/chapter-IX/subchapter-A/part-904/subpart-B NOAA 2025d Frequently Asked Questions – Enforcement (webpage). Available at: https://www.noaa.gov/general-counsel/gc-enforcement-section/frequently-asked-questions-enforcement NOAA 2025e National Summary Settlement & Fix It Schedule (document). Available at: https://www.noaa.gov/sites/default/files/2025-07/National-SS%20Fix-it_FINAL.docx NOAA 2025f Alaska Region Summary Settlement & Fix It Schedule (document). Available at: https://www.gc.noaa.gov/documents/gces/AK%20SS%20and%20Fix-it_FINAL.pdf NOAA Fisheries 2026a Electronic Reporting in Alaska Fisheries (webpage). Available at: https://www.fisheries.noaa.gov/alaska/resources-fishing/electronic-reporting-alaska-fisheries NOAA OLE 2025a Enforcement priorities and operations overview (webpage). Available at: https://www.fisheries.noaa.gov/topic/enforcement NOAA OLE 2025b NOAA OLE Alaska Division Report to the NPFMC (December 2025). Available at: https://meetings.npfmc.org/CommentReview/DownloadFile?p=ddaf96fe-32fc-4b14-a044-9cf3cd5f4b51.pdf&fileName=B5%20NOAA%20OLE%20Report.pdf Pay.gov 2026 NOAA Office of Law Enforcement Summary Settlement Offer Penalty Payment Form (webpage). Available at: https://www.pay.gov/public/form/start/1005890843 State of Alaska 2025a Alaska Statutes § 16.05.722 – Strict liability commercial fishing penalties (summary). Available at: https://law.justia.com/codes/alaska/title-16/chapter-05/article-4/section-16-05-722/ State of Alaska 2025b Alaska Statutes § 16.05.723 – Misdemeanor commercial fishing penalties (summary). Available at: https://law.onecle.com/alaska/title-16/16.05.723.html
Statement of consistency to the CSI RFM Fishery Standard 2.2	**The fishery continues to meet the requirements of Fundamental Clause 11 of the CSI Fishery Standard 2.2.**

7.8.4. Section D: Serious Impacts of the Fishery on the Ecosystem

7.8.4.1. Fundamental Clause 12. Impacts of the fishery on the ecosystem

12.	**Considerations of fishery interactions and effects on the ecosystem shall be based on the best scientific evidence available, local knowledge where it can be objectively verified, and a risk assessment-based management approach for determining most probable adverse impacts. Adverse impacts of the fishery on the ecosystem shall be appropriately assessed and effectively addressed.**
Summary of relevant changes:	Evidence viewed during the third surveillance audit confirms that the certified BSAI king and Tanner crab fisheries remain in conformity with RFM Fundamental Clause 12. There is in place a robust fisheries management system that appropriately and adequately considers fishery interactions and effects on the ecosystem (NPFMC, 2011). The BSAI crab fishery management system is based on the best available science while allowing for inputs from fishery participants and other stakeholders including the provision of local and/or traditional knowledge. The management system also incorporates risk-based approaches for determining the most probable adverse impacts of the fishery so that potentially adverse impacts of the fishery on the ecosystem are appropriately assessed and effectively addressed. Habitat protection areas, prohibited species catch (PSC) limits, and crab bycatch limits, are in place to protect important benthic habitat for crab and other resources and to reduce crab bycatch in the trawl and fixed gear groundfish fisheries. If PSC limits are reached in bottom trawl fisheries executed in specific areas, those fisheries are closed. The crab fisheries catch a small quantity of other species as bycatch. A limited number of groundfish, such as Pacific cod, Pacific halibut, and yellowfin sole are caught in the directed pot fishery as well as small amounts of invertebrates (gastropods and echinoderms). Such interactions are appropriately assessed and effectively addressed. As detailed below, results from the third surveillance audit indicate that there have been no significant changes since the last audit of the BSAI crab fisheries in how the fishery management system assesses and responds to ecosystem effects of the fisheries. <u>12.1 Impact of environmental factors on the target stock.</u> There are ongoing assessments of the impacts of environmental factors on target stocks and species belonging to the same ecosystem. NPFMC and NMFS regularly assess the impacts of environmental factors on BSAI crab stocks (see Crab SAFE Reports) and other species belonging to the same ecosystem (*e.g.*, EBS Pacific Cod SAFE; Barbeaux *et al*., 2024). Ecosystem assessments for BSAI crab fisheries are updated annually in the BSAI Crab SAFE. In recent years, an Ecosystem and Socioeconomic Profile (ESP) has been introduced into the stock assessment process (Shotwell *et al*. 2023)[14]. In 2025, ESPs were incorporated into stock assessment reports for BBRKC (Fedewa et al., 2025b), EBS snow crab (Fedewa et al., 2025a), and EBS Tanner crab (Hennessey and Garber-Yonts, 2025). Additionally, the status of habitats and ecosystems are monitored within the broader framework of Alaska's large marine ecosystems and results are updated and published annually (*e.g.*, Siddon 2024; Ortiz and Zador 2024). Collectively, these ecosystem assessments consider target stocks, associated or dependent species, and the relationship among populations in the ecosystem. In 2018, the Council approved the Bering Sea Fisheries Ecosystem Plan (FEP; NPFMC, 2019), thereby formalizing its commitment[15] to ecosystem-based fisheries management (EBFM) of the Bering Sea. The Council has acknowledged that moving toward EBFM is an ongoing process and as new

[14] https://www.fisheries.noaa.gov/feature-story/integrating-ecosystem-and-socioeconomic-information-fisheries-management
[15] https://www.npfmc.org/how-we-work/management-policies/

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information or tools become available the Council will respond by improving the fishery management program. The BS FEP will serve as a framework for continued incorporation of ecosystem goals and actions in regional management. The BS FEP sits alongside the Fishery Ecosystem Plan already developed for the Aleutian Islands (NPFMC, 2007) and it augments ongoing efforts for monitoring ecosystems in the Alaska Region (*e.g.*, Ortiz and Zador, 2024; Siddon, 2024).

CLIMATE CHANGE
Climate change has already had large impacts on the Bering Sea fisheries and ecosystem and impacts are expected to increase over the next decade, with largest changes and risks associated with warmest future scenarios (*i.e.*, higher carbon emission scenarios; IPCC, 2022). The U.S. Government Accountability Office report to congressional committees (GAO-22-105132) identified a priority recommendation to "identify and prioritize opportunities to enhance the climate resilience of federal fisheries… and develop a plan to implement them." In 2022 NPFMC initiated, among other actions, formation of a Climate Change Taskforce (CCTF) within its Bering Sea FEP to ascertain how "climate ready" the current management system is overall and to assist in augmenting existing management for improved climate resilience (Stram *et al*., 2022).

The CCTF produced its final report in December 2024, providing a set of recommendations for meeting the objectives of the Climate Change Action Module and Council's stated goal to advance resilient, climate-ready fisheries management (NPFMC, 2024b). The CCTF final report identifies three key elements around which this workplan could be structured:

- Expand existing (and create new, where appropriate) inclusive processes, collaborations, and partnerships that facilitate inclusion of multiple knowledge systems in climate planning
- Consider management tools and options focused on the inclusion of existing and emergent climate information
- Establish a dedicated review group charged with reviewing and packaging climate information entering Council processes

12.2.1-3 Main and minor species: protection from adverse impacts.
The Council, NMFS and ADFG have established processes for the detection of potentially adverse impacts to non-target catch/associated species taken in BSAI crab fisheries. In addition, monitoring processes are in place to ensure that potentially adverse impacts to non-target catch/associated species do not arise in BSAI crab fisheries. ADFG implements a mandatory observer program for BSAI crab fisheries (Schwenzfeier *et al.*, 2012; Daly and Stichert, 2022). Non-target catches, including discards of target stocks (females, undersized males) and stocks other than the stock under consideration, are recorded in an observer database which is maintained by ADFG (for more details on observer sampling methods see Gaeuman, 2014). Observer results are provided regularly to stock assessment authors so that potential impacts are considered during annual stock assessment activities.

Fishery management organizations have considered the most probable adverse impacts of BSAI crab fisheries on associated species (NMFS, 2004; Chilton *et al.*, 2011). The pot gear used for crab in the BSAI is relatively selective and the consensus view among experts is that the primary associated species in the BSAI crab fisheries are non-retained crabs which are species managed under the Crab

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FMP. Females and sub-legal crabs which are brought up in pots with legal males may account for up to two thirds of the total catch (NMFS, 2004). Therefore, non-target crab species are designated "main associated species" in accordance with CSI guidance (*i.e.*, those taxa contributing to the top 80% of total bycatch in the Bycatch Species Profile; see Mateo et al., 2022 for further details). All removals and mortalities of FMP crabs - whether from crab fisheries, groundfish fisheries or scallop fisheries - are accounted for in annual stock assessment activities. Accordingly, these catches (including discards) are appropriately monitored and do not threaten these non-target species with serious risk of extinction, recruitment overfishing, or other impacts that are likely to be irreversible or very slowly reversible. If such impacts were to arise, effective remedial action would be taken.

CSI guidance identifies "minor associated species" as those taxa contributing to the next 15% of total bycatch in the bycatch species profile (*i.e.*, taxa representing between 80% and 95% of total bycatch). For BSAI crab fisheries, bycatch species which are designated as minor associated species (Mateo et al., 2022 and Mateo and Toller, 2024) fall into four taxonomic groupings:

- unidentified snails;
- Pacific cod;
- non-FMP crabs; and
- brittle star, basket star and other echinoderms.

Pacific cod, *Gadus macrocephalus*, is a widely distributed and highly abundant representative of the greater groundfish community which is managed by NPFMC as a tier 3 stock in the Eastern Bering Sea and is thus adequately assessed elsewhere (Barbeaux *et al.*, 2024). Regarding the three invertebrate taxonomic groupings, NMFS (2004) concluded that gastropods and echinoderms comprise a major portion of the total biomass of the eastern Bering Sea and small losses due to pot bycatch would have little significance. In some cases, crab pot bycatch have become part of small, dedicated fisheries as for snails, octopus, and Korean hair crab. Minor losses of other invertebrates are not estimable but assumed to be relatively insignificant. In addition, the minor amount of these species caught as bycatch does not result in declines in species diversity because it does not cause a decline in any species abundance. From this information, NOAA Fisheries concludes that status quo has an insignificant effect on the population levels of benthic species caught as bycatch.

During the third surveillance audit, the assessment team saw no evidence of a significant change in the way BSAI crab fisheries interact with main and minor associated species. ADFG staff confirmed that bycatch levels remain low in BSAI crab fisheries (M. Stichert, pers. comm.). With respect to recent fishing seasons, ADFG noted it is possible, if not probable, that the likelihood of crab fishery impacts to BSAI ecosystems, including potential impacts to non-target catch/associated species, has declined owing to reduced fishing effort for crab.

<u>12.2.4-5 ETP species: protection from adverse impacts.</u>
Management objectives exist which seek to ensure that endangered species are protected from adverse impacts resulting from interactions with BSAI crab fisheries. All U.S. fisheries management, including that of BSAI crab fisheries, must be consistent with the MSA[16], the Marine Mammal

[16] https://www.fisheries.noaa.gov/resource/document/magnuson-stevens-fishery-conservation-and-management-act

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Protection Act (MMPA)[17], and the U.S. Endangered Species Act (ESA)[18]. Each of these acts establishes management guidelines, objectives, and legal protections for threatened and endangered species. During surveillance, ADFG noted that it is possible, if not probable, that the likelihood of crab fishery impacts to BSAI ecosystems, including potential impacts to ETP species, would be even further reduced owing to fishery closures for BBRKC and EBS snow crab stocks during recent seasons (M. Stichert, ADFG, pers. comm.).

SEABIRDS

The Coordinated Seabird Studies (CSS) at the Alaska Fisheries Science Center (AFSC) promotes the collection and use of seabird data in an ecosystem-based fisheries management framework (EBFM). The CSS recently released a Strategic Plan (Fitzgerald and Dolliver, 2023) which outlines recommended research, service, outreach, and publication priorities over the next 5 years 2022-2026. NMFS provides the Council with annual estimates of seabird bycatch for the combined groundfish and halibut fisheries. Of ESA-listed seabirds, there were an estimated 2 endangered short-tailed albatross (*Phoebastria albatrus*) taken in the groundfish fishery in 2023. There were no reported takes on short-tailed albatross in 2024. For the threatened spectacled eider (*Somateria fischeri*), and threatened Alaska-breeding population of Steller's eider (*Polysticta stelleri*), there were no reported takes in 2023 and 2024 (NMFS, 2025).

In comparison to other gear types used in federal fisheries off Alaska, pot gear remains the gear type with the least amount of estimated seabird bycatch, representing an average of 2.8 percent of the total seabird bycatch from all gear types from 2011 through 2021 (range 0 to 13.4 percent). In recent years, there was no estimated seabird bycatch from pot gear (Tide and Eich, 2022) nor any reported bycatch of ESA-listed seabirds in BSAI crab traps (A. Olsen, pers. comm., 2024).

MARINE MAMMALS

Young *et al*. (2024) provide updated stock assessments for Alaska's marine mammals. The following sections summarize information relevant to the main marine mammal species with potential to interact with BSAI crab fisheries. Note that the 2024 Alaska Marine Mammal Stock Assessment Report was still in preparation during the third surveillance audit (S. Teerlink, NOAA, pers. comm.) and therefore unavailable to the assessment team.

The 2023 stock assessment of bowhead whale (*Balaena mysticetus*) Western Arctic Stock concludes that, based on currently available data, the minimum estimated mean annual mortality and serious injury rate incidental to U.S. commercial fisheries (0 whales) is not known to exceed 10% of the Potential Biological Removal or PBR (10% of PBR = 12) and, therefore, can be considered insignificant and approaching a zero mortality and serious injury rate. The authors note, however, there are key uncertainties in the assessment. Although there are few records of bowhead whales being killed or seriously injured incidental to commercial fishing, about 12.2% of harvested bowhead whales examined for scarring (59/485 records) had scars indicating line entanglement wounds (George *et al*., 2017) and the southern range of the population overlaps with commercial pot fisheries (Citta *et al*., 2014).

[17] https://www.fisheries.noaa.gov/topic/marine-mammal-protection
[18] https://www.fisheries.noaa.gov/topic/laws-policies/endangered-species-act

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In the update of the stock status of humpback whale (*Megaptera novaeangliae kuzira*): Mexico-North Pacific Stock, Young *et al*. (2024) provide a summary of mortality and serious injury of humpback whales within the range of the Mexico-North Pacific stock for the years 2016-2020. Crab pot gear was not recorded as a cause of injury (0 whales). Nonetheless, as humpback whales are increasing their range and number further north through the Bering into the Chukchi and Beaufort (Stafford *et al.*, 2024), entanglement in crab pot gear – a previously documented occurrence in the Bering Sea crab fishery[19] - may become a concern in the future (A. Olson, pers. comm.).

Sperm whale entanglements and mortalities were heretofore unreported in the AIGKC fishery (e.g. Table 1). The interaction was not identified in previous stock assessments (Young et al., 2024) nor was it an element in the dataset of human-caused mortality and injury of Alaska marine mammal stocks (Brower *et al.*, 2024). However, new information recently came to light about an entanglement event that was observed in 2018. Revisiting of this event enabled researchers to positively identify the species involved as a sperm whale. Extending on this observation, it was suggested that the rate of sperm whale fishing mortality in the AIGKC fishery is 0.2 whales per year (Seafood Watch, 2025). However, this estimate may be inaccurate because it is based on a single observation. In interviews with experts, it was noted that such interactions are infrequent albeit difficult to detect, and it was suggested that this incident is unlikely to drive a category change for AIGKC in the List of Fisheries. A forthcoming study on Alaska sperm, grey, and bowhead whales – one which examines fishery-whale interactions over a 20-year timeframe - may provide more insight into this issue (S. Teerlink, pers. comm.).

Table 10. MMPA classification of fisheries: AK Bering Sea, Aleutian Islands crab pot, 2010 to 2024[20].

Year	Est. # of Vessels / Persons	Classification	Marine Mammal Species and Stock Incidentally Killed or Injured
2025	73	III. remote likelihood of/ no known interaction*	Bowhead whale, Western Arctic Gray whale, Eastern North Pacific
2024	73	III. remote likelihood of/ no known interaction	Bowhead whale, Western Arctic Gray whale, Eastern North Pacific
2023	540	III. remote likelihood of/ no known interaction	Bowhead whale, Western Arctic Gray whale, Eastern North Pacific
2022	540	III. remote likelihood of/ no known interaction	Bowhead whale, Western Arctic Gray whale, Eastern North Pacific
2021	540	III. remote likelihood of/ no known interaction	Bowhead whale, Western Arctic Gray whale, Eastern North Pacific

[19] https://www.adn.com/fishing/article/alaska-crab-buoys-hitch-ride-hawaii-humpback-whale/2014/04/07/

[20] Source: NOAA List of Fisheries Summary Tables, Table 1 – Commercial Fisheries in the Pacific Ocean, https://www.fisheries.noaa.gov/national/marine-mammal-protection/list-fisheries-summary-tables#table-1-category-iii

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2020	540	III. remote likelihood of/ no known interaction	Bowhead whale, Western Arctic Gray whale, Eastern North Pacific
2019	540	III. remote likelihood of/ no known interaction	Bowhead whale, Western Arctic Gray whale, Eastern North Pacific
2018	540	III. remote likelihood of/ no known interaction	Gray whale, Eastern North Pacific
2017	540	III. remote likelihood of/ no known interaction	Gray whale, Eastern North Pacific
2016	540	III. remote likelihood of/ no known interaction	Gray whale, Eastern North Pacific
2015	540	III. remote likelihood of/ no known interaction	Gray whale, Eastern North Pacific
2014	296	III. remote likelihood of/ no known interaction	Gray whale, Eastern North Pacific
2013	296	III. remote likelihood of/ no known interaction	None documented
2012	297	III. remote likelihood of/ no known interaction	None documented
2011	297	III. remote likelihood of/ no known interaction	None documented
2010	297	III. remote likelihood of/ no known interaction	None documented

*Proposed classification, 2025 List of Fisheries, 9/24/2024:

12.2.6-8 Habitats: knowledge of essential habitats and protection from adverse impacts.

In accordance with requirements of the MSA, management agencies have knowledge of essential fish habitat (EFH) for the BSAI crab stocks under consideration. The potential for fishery impacts on habitats is assessed through the EFH process. Management systems ensure that fishery impacts on EFH and on habitats that are highly vulnerable to damage by the fishing gear are avoided, minimized, or mitigated. Crab EFH was described in Appendix F of the Crab FMP (NPFMC, 2011). Amendment 49, approved on May 31, 2018 (Final Rule: 83 FR 31340), updated the description and identification of EFH, and updated information on adverse impacts to EFH based on the best scientific information available (NOAA Fisheries, 2018).

In 2023, the Council revised the EFH sections of its FMPs to address the results of the EFH 5-year review (NPFMC, 2023)[21]. NOAA approved amendment 56 on July 15, 2024 (50 CFR Part 679)[22]. Amendment 56 updates the BSAI Crab FMP to include new species distribution models and maps, updated text descriptions, EFH fishing effects evaluations (Zaleski *et al*., 2024), a reference to the new Non-Fishing Effects Report (Limpinsel *et al*., 2023), and research priorities looking ahead (NOAA Fisheries, 2024). The new BSAI Crab EFH maps are for all life history stages combined for summer distribution due to data availability for the species distribution model ensembles. No species were

[21] https://meetings.npfmc.org/CommentReview/DownloadFile?p=22e72bde-9bf5-4a5e-a68c-6b2b9e71b797.pdf&fileName=C5%20Motion.pdf
[22] https://www.federalregister.gov/documents/2024/07/19/2024-15930/fisheries-of-the-exclusive-economic-zone-off-alaska-essential-fish-habitat-amendments

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elevated for mitigation measures against fishing effects to EFH, though some species were highlighted with concerns around limited data or smaller areas to review (*e.g.*, Petral Bank for AI red king crab)[23]. Planning is underway for the 2028 EFH 5-year review (Pirtle et al., 2025)

There have been a number of recent research activities directed at deepwater corals, sponges and associated benthic communities of the Aleutian Islands. From May through September 2023, NOAA and partners conducted the Seascape Alaska series of telepresence-enabled ocean exploration expeditions on NOAA Ship *Okeanos Explorer*.[24]. The primary goal of the cruise was to increase mapping coverage in unexplored regions off Alaska, with a focus on waters deeper than 200 m. Survey results are still pending. NOAA presented an overview of its program objectives to the NPFMC, noting the focus on deepwater habitats of the Aleutian Islands for 2023 (Hourigan and Coleman, 2023). Also, as part of a separate effort with relevance to deep sea fauna, NOAA recently published a guide to the corals of Alaska (Stone *et al.*, 2023). Conrath et al. (2025) give a summary of ten projects done under the auspices of the Deep Sea Coral Research and Technology: Alaska Coral and Sponge Initiative from 2020 to 2024.

12.2.9-10 Ecosystems: monitoring and protection from adverse impacts.

NPFMC, NMFS and ADFG consider the most probable impacts of BSAI king crab fisheries on the ecosystem, assess and monitor those impacts, and where necessary take remedial actions to address adverse impacts if they should arise. The BSAI Crab Environmental Impact Statement (EIS; NMFS, 2004), Fishery Management Plan (FMP) for BSAI King and Tanner Crabs (NPFMC, 2011), and BSAI and AI Fishery ecosystem plans (FEPs; NPFMC, 2007, 2019) create a framework for monitoring ecosystem impacts as previously documented (Mateo et al., 2022, Mateo and Toller, 2024). During the third surveillance audit, the assessment team saw evidence for continuing conformity, which included:

- Annual stock assessments as documented in Crab SAFE Reports for BSIA crabs (NPFMC, 2025);
- Preparation of annual ESPs for BSAI crabs (Fedewa et al., 2025a,b; Hennessey and Garber-Yonts, 2025);
- Publication of annual Alaska Ecosystem Status Reports (Siddon, 2024; Ortiz and Zador, 2024);
- Reports from regular (approximately quarterly) Crab Plan Team meetings in 2025;
- Summaries of observer coverage rates conducted under the ADFG Mandatory Crab Observer Program (*e. g.*, Schwenzfeirer, 2012; Gaeuman, 2014; Daly and Stickert, 2022)
- Council protocol for local knowledge and traditional systems (NPFMC, 2023)[25] and
- Recent climate planning efforts undertaken by NPFMC (NPFMC, 2024[26])

12.3-4 Key prey species and dependent predators

No change since the previous surveillance audit. The food web roles of the five BSAI crab stocks under consideration here are reasonably well understood and none are considered key prey species (see

[23] https://www.fisheries.noaa.gov/s3/2024-04/bsai-crab-fmp-amd56.pdf
[24] https://oceanexplorer.noaa.gov/okeanos/explorations/seascape alaska/ex2303/welcome.html#:~:text=Expedition%20Summary,of%20Alaska%20and%20Aleutian%20Islands
[25] https://www.npfmc.org/how-we-work/management-policies/
[26] https://meetings.npfmc.org/CommentReview/DownloadFile?p=9f2ae564-ef8f-477e-a855-_5ee4a5033edc.pdf&fileName=D1%20Action%20Memo.pdf

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	detailed evidence presented under Supporting Clause 12.3 in Mateo et al., 2022). The Council does not identify BSAI crab stocks as forage species for groundfish (e.g., see BSAI Groundfish FMP[27]), and no predators are known to have an obligate or dependent relationship (*sensu* Pikitch *et al.*, 2012) with BSAI crab stocks. Thus, available evidence indicates that the BSAI crab stocks under consideration here are not key prey species whose removal could adversely impact dependent predators (Chilton *et al*., 2011). During the second surveillance audit, technical experts affirmed that there has been no substantial change in our understanding of the ecological roles of the five BASI crab stocks, and that they are not key prey species in the food web. Nonetheless, mechanisms do exist within the Council process to establish outcome indicators consistent with achieving avoidance of severe adverse impacts on dependent predators. For example, the BSAI Groundfish FMP and Salmon FMP[28] both address potential impacts to dependent predators using outcome indicators. Thus, there are ongoing programs for monitoring of outcome indicators to ensure that adverse impacts to dependent predators do not arise. In addition, outcome indicators for crab predators are in place and used for ongoing monitoring programs as evidenced by the annual publication of stock assessment and fishery evaluation (SAFE) reports[29], marine mammal stock assessment reports (Young *et al*., 2024), and ecosystem status reports (Siddon, 2024; Ortiz and Zador, 2024). <u>12.5 Pollution and MARPOL</u> Surveillance audit results indicate that there have been no significant changes to the legal/regulatory framework for pollution in relation to BSAI crab fisheries. Laws and regulations based on the International Convention for the Prevention of Pollution from Ships (MARPOL 73/78) are in place and enforced. The US Senate ratified MARPOL and Congress implemented it by the Act to Prevent Pollution from Ships (APPS; 33 U.S.C. §§1905-1915) on October 21, 1980. The US EPA and USCG have established protocols for managing its enforcement[30]. To further facilitate enforcement, APPS contains a “whistle blower provision” - those who come forward with violations of APPS or MARPOL may be compensated with up to 50% of the monetary penalties that the U.S. Government receives from the guilty parties[31]. <u>12.6 Research on gear impacts</u> There has been no significant change since the last surveillance audit. In Alaska there is a great deal of research into the social and environmental impact of fishing gear and its impact on biodiversity and coastal fishing communities. This research is performed, promoted, or supported by public entities including NFMS-AFSC, NPFMC and NPRB, academic institutions such as the Institute of Social and Economic Research, University of Alaska[32], as well as private groups such as the Alaska Fisheries Development Foundation (AFDF)[33], Alaska Bering Sea Crabbers (ABSC)[34], and Bering Sea Fisheries

[27] https://www.npfmc.org/wp-content/uploads/BSAIfmp.pdf
[28] https://www.npfmc.org/wp-content/PDFdocuments/fmp/Salmon/SalmonFMP.pdf
[29] https://www.npfmc.org/library/safe-reports/
[30] https://www.epa.gov/enforcement/marpol-annex-vi-and-act-prevent-pollution-ships-apps
[31] https://www.whistleblowers.org/stop-shipping-pollution/
[32] https://iseralaska.org/
[33] https://afdf.org/
[34] https://www.alaskaberingseacrabbers.org/science

12.	**Considerations of fishery interactions and effects on the ecosystem shall be based on the best scientific evidence available, local knowledge where it can be objectively verified, and a risk assessment-based management approach for determining most probable adverse impacts. Adverse impacts of the fishery on the ecosystem shall be appropriately assessed and effectively addressed.**
	Research Foundation (BSFRF)[35]. In 2025, BSFRF provided a summary of their research activities to NPFMC[36] and in 2026 BSFRF will conduct research on the impact of lost crab pots in Bristol Bay (S. Goodman, pers. comm.). 12.7 Marine Protected Areas (MPAs) There has been no significant change since the last surveillance audit. State and Federal management agencies and NPFMC have frequently used MPAs as management tools in Alaska. According to Brock (2015), 95 MPAs have been established in Alaska, covering a total area of 2,737,588 km^2 in four major ecoregions. Given the large number of MPAs, it is not surprising that specific conservation objectives vary from one MPA to another. However, most of Alaska's MPAs have been established with an aim to ensure the sustainability of fish stocks and fisheries, and/or to protect marine biodiversity and critical or sensitive habitats. For example, the NPFMC notes that vast areas of the North Pacific have been permanently closed to groundfish trawling and scallop dredging to reduce potential adverse impacts on sensitive habitat and to protect benthic invertebrates. These marine protected areas comprise a relatively large portion of the continental shelf, and in many respects serve as marine reserves. In addition, fishery closures established in nearshore areas to reduce interactions with Steller sea lions have ancillary benefits of reducing habitat impacts as well[37]. The National Marine Protected Areas Center[38] maintains a comprehensive geospatial database for MPAs that combines publicly available data with information from state and federal MPA programs. An updated map of MPAs was presented in the BSAI Crab re-assessment report (Mateo et al., 2022). Also see the NMPAC website[39] to view an interactive MPA Inventory for the Alaska region.
References:	Section 10 provides full citations and hyperlinks for the following references: - Barbeaux et al., 2024 - Brock, 2015 - Brower et al., 2024 - Chilton et al., 2011 - Citta et al., 2014 - Conrath et al., 2025 - Daly and Stichert, 2022 - Fedewa et al., 2025a,b - Fitzgerald and Dolliver, 2023 - Gaeuman, 2014 - George et al., 2017 - Mateo et al., 2022 - Hennessey and Garber-Yonts, 2025 - Hourigan and Coleman, 2023 - IPCC, 2022

[35] https://bsfrf.org/
[36] https://meetings.npfmc.org/CommentReview/DownloadFile?p=c73198ff-f670-40bc-a179-0cd8b48f213b.pdf&fileName=PPT%20B1%20BSFRF-ADFG-NMFS%20Crab%20Research%20Update.pdf
[37] https://www.npfmc.org/fisheries-issues/issues/habitat-protections/
[38] https://marineprotectedareas.noaa.gov/aboutmpas/mpacenter/
[39] https://marineprotectedareas.noaa.gov/dataanalysis/mpainventory/mpaviewer/

12.	**Considerations of fishery interactions and effects on the ecosystem shall be based on the best scientific evidence available, local knowledge where it can be objectively verified, and a risk assessment-based management approach for determining most probable adverse impacts. Adverse impacts of the fishery on the ecosystem shall be appropriately assessed and effectively addressed.**
	- Limpinsel et al., 2023 - NMFS, 2004, 2025 - NOAA Fisheries, 2018 - NOAA Fisheries, 2024 - NPFMC, 2007, 2011, 2019, 2023, 2024a, b - Ortiz and Zador, 2024 - Pikitch et al., 2012 - Pirtle et al., 2025 - Schwenzfeirer, 2012 - Siddon, 2024 - Stafford et al., 2024 - Stone et al., 2023 - Stram et al., 2022 - Young et al., 2024 - Zaleski et al., 2024
Statement of consistency to the CSI RFM Fishery Standard 2.2	**Notwithstanding the open NC for supporting clause 12.2.6 (see below), the fishery continues to meet the requirements of Fundamental Clause 12 of the CSI RFM Fishery Standard 2.2.**

7.8.4.2. Fundamental Clause 13. Fisheries enhancement activities (remove if not applicable)

13.	**Where fisheries enhancement is utilized, environmental assessment and monitoring shall consider genetic diversity and ecosystem integrity.**
Summary of relevant changes:	**Important Note:** Fundamental Clause 13 is not applicable. The fishery under assessment does not utilize fisheries enhancement techniques.
References:	
Statement of consistency to the CSI RFM Fishery Standard 2.2	**FC 13 is not applicable**

8. Update on compliance and progress with non-conformances and agreed action plans

This section details compliance and progress with non-conformances and agreed action plans including:

A. A review of the performance of the Client specific to agreed corrective action plans to address non-conformances raised in the most recent assessment or re-assessment or at subsequent surveillance audits including a summary of progress toward resolution.
B. A list of pre-existing non-conformances that remain unresolved, new nonconformances raised during this surveillance, and non-conformances that have been closed during this surveillance.
C. Details of any new or revised corrective action plans including the Client's signed acceptance of those plans.
D. An update of proposed future surveillance activities.

8.1.1. Closed non-conformances

No non-conformances were closed in this 3rd surveillance audit.

8.1.2. Progress against open non-conformances

Non-conformance 1 (of 3)	
Clause:	6.3
Non-conformance level:	Minor
Non-conformance:	The SMBKC stock was declared overfished on October 22, 2018. In order to comply with provisions of the Magnuson-Stevens Fishery Conservation and Management Act (MSA), a rebuilding plan must be implemented prior to the start of the 2020/2021 fishing season. The fishery was closed for the 2016/17 season and has remained closed each year since. In recent assessments, MSST has been steadily dropping from 1.9 kt in 2016/17 to 1.67 kt in 2019/20. MMB was 1.12 kt in 2020/21 – a very small increase from 1.06 kt in 2019/20 – but the stock remains below the MSST estimated for 2019/20.
Rationale:	Based on the best available information on the biology of the SMBKC stock and environmental conditions, the time necessary to rebuild the stock will exceed 10 years. The SMBKC stock has been in a low productivity phase since 1996 and population recovery will be greatly influenced by environmental conditions. Despite existing protections and frequent fishery closures, the stock has remained in this low productivity phase. Projections of stock recovery incorporate ecosystem constraints on productivity by forecasting recruitment as a function of stock size in model-recruit parameters. The estimated time for rebuilding under the Council's preliminary preferred alternative, taking into account the biology of the species and current environmental conditions, is 25.5 years. The contribution of the rebuilding plan to stock recovery would be additive to measures already in place that limit the effects of fishing activity on SMBKC. The directed fishery for SMBKC is managed under the State of Alaska harvest strategy and has been closed from the 2016/2017 season, prior to the stock being declared overfished. Measures to protect habitat and reduce bycatch potential include prohibitions on non-pelagic trawl gear in the St. Matthew Island Habitat Conservation Area (SMIHCA). Additionally, a 20 nm Steller sea lion closure area around the southern tip of Hall Island prohibits trawling, hook-and-line, and pot fisheries for pollock, Pacific cod, and Atka mackerel may help reduce SMBKC bycatch in those fisheries. Finally, State jurisdictional waters (0 to 3 nm from shore) surrounding St. Matthew, Hall, and Pinnacle Islands are closed to the taking of king and Tanner crab and to commercial

Non-conformance 1 (of 3)	
	groundfish fishing, further reducing the potential for SMBKC bycatch. See evidence for SC 6.3 (Section 9.3.3.3) for details of analyses related to the rebuilding plan. The "Extraordinary circumstances" provision of AK RFM Procedures 2 § 3.17 is used here as a basis for recommending carry over of the NC against SMBKC into this reassessment. The extraordinary circumstances being: (1) The NC was raised in the 2nd surveillance of the previous reassessment and 2 years is a very short time in which to observe a significant improvement in stock status; (2) Fishing pressure is not the sole contributor to the decline of this stock in recent years. Environmental/ecosystem changes associated with ocean warming appear to be impeding recruitment and stock recovery; (3) The fishery has been closed and will remain closed until there is improved recruitment.
Corrective Action Plan (CAP):	The client's corrective action plan (CAP) is presented in full in the 2nd surveillance audit of the 1st certification cycle (see footnote 5 included in Section 8.1). **STMTBKC Corrective Action Plan - update 03/25/25** **Item #1 - Support of and attention to STMTBKC rebuilding plan** The terms of the rebuilding plan for this stock remain in effect, and the CPT current stock priorities reflect the assessment is biennial and was completed in October of 2024. The current stock status is the same in 2024 (September CPT) as 2023 , and although overfishing did not occur, the stock is not rebuilt. The updated status on this stock projects a small increase for biomass (improving) to be above MSST in 2024/25 but continues to reflect some uncertainty about its persisting low levels. The September 2024 updated assessment addressed some of this uncertainty resulting from required changes in the Bering Sea trawl survey that dropped 'corner stations' which impacts abundance and biomass estimation (negatively) for this stock. The SSC recommended further evaluation of this effect, and we will track this evaluation and report as updates occur. **Item #2 - Support of and Participation in SMBKC Stock Assessment - GMACs support & State Survey** The planned stock assessment model was completed in GMACs in September 2024. The model is performing well with capabilities to evaluate data sources, points of uncertainty, progress within rebuilding goals, and status updates that provide management advice across the years without assessment updates. The assessment took into account the 2022 state pot survey data – which had relatively high CPUE for SMBKC, and this was important in the selection of final model outcomes. The CPT chairs noted to the SSC that with NMFS trawl corner stations dropping, there is increasing importance of the state's triennial pot survey for this stock. The upcoming ADF&G plans for the SMBKC pot survey are intended to be in collaboration with the crab industry – through BSFRF. Current pot survey strategy includes a primary option to have BSFRF administer the charter for the survey. As such, we will provide an industry perspective update of results from the 2025 SMBKC pot survey at the next surveillance. **Item #3 - Record keeping and reporting for SMBKC stock - bycatch monitoring** The update for the third component of this action plans is to again report there was no substantial SMBKC bycatch occurring in crab or non-crab fisheries in the SMBKC management area as reported in the CPT summary report which stated "there has been little bycatch of SMBKC in other crab fisheries in the past decade, and little bycatch in trawl fisheries, with some bycatch occurring in fixed gear (pot) fisheries" (CPT September 2024).

Non-conformance 1 (of 3)	
	As we noted in prior CAP updates, the spatial overlap of the SMBKC area with other directed crab fisheries is mostly with Bering Sea opilio – and since two opilio season closures and one small season have occurred recently, the main potential pot fishery impact is diminished. We are continuing to monitor the seasonal progression of crab bycatch through the existing NMFS catch reporting system and will report to assessors at the next update about any anomalies.
Progress against the CAP:	Progress against the CAP 2025: The SMBKC stock is on a biennial assessment cycle and was last assessed in 2024. In that assessment it was estimated that mature male biomass in 2023/24 was below the MSST, indicating that the stock remains overfished. Estimated total bycatch has remained well below the overfishing level (OFL), hence overfishing has not occurred. The directed fishery has been closed and there is little bycatch in other crab fisheries. There is little trawl bycatch due to trawl closure areas and bycatch in the fixed gear groundfish fisheries has been relatively low since 2022. Catches in the 2025 survey showed a continued stable low abundance of both mature and legal male abundance. Immature female abundance was relatively high, with the 2025 survey abundance estimate the highest since the 1990s. However, 74% of the immature females were caught in a single station, and therefore, the precision of the abundance estimate is low. MMB/MMB_{MSY} has increased from 0.31 (2019-20) to 0.47 (2023-24) and was projected to be 0.52, just above the MSST, for 2024/25. The projected MMB estimated for 2024/25 was 1,530 t. The F_{OFL} resulted in a mature male biomass OFL of 129 t. A 25% buffer on the OFL resulted in an ABC of 97 t. The CPT recommended the same OFL and ABC for 2025/2026. The 2025 raw survey and model-based estimates of mature male abundance remain below the state harvest strategy threshold for a fishery opening. Therefore, the Saint Matthew Island blue king crab fishery remains closed for the 2025/26 season.
Non-conformance status:	This non-conformance remains open as of the 3rd surveillance audit. Corrective Actions are in place and to be reviewed annually at surveillance audits.

Non-conformance 2 (of 3)	
Clause:	6.3
Non-conformance level:	Minor
Non-conformance:	The eastern Bering Sea snow crab population was declared overfished in October 2021 and the directed fishery was closed for the 2022 season. The Council developed a rebuilding plan to be implemented prior to the start of the 2023/2024 fishing season. The projected time for rebuilding the EBS snow crab stock, taking into account the biology of the species and current environmental conditions, is 6 years.
Rationale:	Observed mature male biomass (MMB) slowly increased after 1999, and the stock was declared rebuilt in 2011 when estimated MMB at mating was above B35%. However, after 2011, the stock declined and the observed MMB at the time of survey dropped to 63.21 kt in 2016. Recently, MMB was increasing again as a large recruitment moved through the size

Non-conformance 2 (of 3)	
	classes, but that recruitment has since disappeared and the observed mature male biomass at the time of the 2022 survey was 37.5 kt, a new all-time low and 40% less than the previous all-time low seen in the 2021 survey. On October 19, 2021, NMFS determined and notified the Council that the EBS snow crab stock was overfished. To comply with provisions of the Magnuson-Stevens Act, the Council developed a rebuilding plan to be implemented prior to the start of the 2023/2024 fishing season. On February 2023, the Council chose a rebuilding plan for EBS snow crab that will allow bycatch removals and an opportunity for directed harvest during rebuilding if estimates of stock biomass are sufficient to open the fishery under the State's snow crab harvest strategy. The rebuilding plan is consistent with the Magnuson-Stevens Act and with National Standard 1 Guidelines on time for rebuilding, specifically rebuilding within a time (Ttarget) that is as short as possible, taking into account the status and biology of any overfished stocks of fish, the needs of fishing communities, recommendations by international organizations in which the United States participates, and the interaction of the overfished stock of fish with the marine ecosystems. This rebuilding plan will allow directed fishing pursuant to the State harvest strategy and may provide important economic opportunities for harvesters, processors, and Alaska communities. Maintaining this economic opportunity for a limited directed commercial fishery under the State harvest strategy is important for harvesters, processors, and communities, particularly during this time when the majority of commercial crab stocks are in a state of decline and future openings are likely to be limited. Under the Magnuson-Stevens Act, the time period specified for rebuilding a fishery generally should not exceed 10 years unless the biology of the stock or environmental conditions dictate otherwise. The projected time for rebuilding the EBS snow crab stock, taking into account the biology of the species and current environmental conditions, is 6 years. The main driver in the speed of rebuilding is likely related to recruitment and the ecosystem conditions that allow for increased recruitment into the population. Uncertainty surrounding recruitment and mortality under current ecosystem conditions is expected to heavily influence the rate at which the stock is able to rebuild under the projection parameters. Fishing mortality under the State's current harvest strategy is expected to have only insignificant or minimal impacts on the rate of rebuilding. Amendment 53 adds Section 6.2.3 to the Crab FMP to include the rebuilding plan for EBS snow crab. Under the rebuilding plan, ecosystem indicators developed for the stock will be monitored during rebuilding. The NMFS EBS bottom-trawl survey provides data for the annual assessment of the status of crab stocks in the BSAI, including EBS snow crab, and will continue throughout rebuilding. The Council's BSAI Crab Plan Team will report stock status and progress towards the rebuilt level in the Stock Assessment and Fishery Evaluation (SAFE) Report for the King and Tanner Crab Fisheries of the BSAI. Additionally, the State and NMFS monitor directed fishery catch and bycatch of snow crabs in other fisheries. When the fishery is open, the State requires full observer coverage (100 percent) for catcher/processors and partial coverage (30 percent) for catcher vessels participating in the crab fishery. Observers monitor harvest at sea and landings by catcher vessels and shoreside processors. The State reports the total harvest from the commercial crab fishery, and that report will be included annually in the SAFE Report. The contribution of the rebuilding plan's assessment and

Non-conformance 2 (of 3)	
	monitoring to stock recovery will be additive to measures already in place that limit the effects of fishing activity on EBS snow crab.
Corrective Action Plan (CAP):	The CAP for this non-conformance was put in place as part of the 1st audit in 2023 and is included as Section 8.1.4 of that report (link included in 8.1 above). **Bering Sea Opilio Corrective Action Plan - update 03/25/25** **Item #1 - Compilation of recent collaborative workshop information to share with assessors** The BSFRF (BSCCG Client entity) convened two hybrid snow crab workshops in January and December of 2021. There have been some notable publications that have drawn from related material that the assessment team has seen and reviewed for this update. To avoid some likely redundancy, we have included in this update (email attachments), the summary overview from both of these initial events – and will make further elements of both workshops available upon request to the assessment team. These workshop findings are unpublished - but if there are specific items of interest we can provide those. **Item #2 - Sharing of information/summaries of 2024 international workshop on snow crab** The BSFRF (BSCCG Client entity) co-hosted a meeting in St. John's, NL (CA) with DFO April 29 – May 1, 2024. The workshop agenda material is provided in this update (email attachment). We have access to presentations and related items that were part of the workshop – we can make those available on request to the assessment team. This workshop outcomes, findings, and management advice are currently in press (Gordon Kruse lead for BSFRF, expected to be published with ADF&G Special Report Series) and we will provide those to the assessors also when completed. **Item #3 - Support of and attention to Bering Sea opilio rebuilding plan** The terms of the rebuilding plan for this stock are in effect, and the assessors are aware that the stock is not rebuilt, is not experiencing overfishing, and reached a level that would support a small commercial fishery. Although the NMFS summer survey abundance estimates showed some positive signals for recovery, the stock assessment's more complete review was more uncertain. The expectations for the stock are still greatly dependent on annual survey data from the NMFS Bering Sea summer trawl survey, along with insight from the assessment completed each September. The client group is involved in collaborative opilio research as part of expanding federal fishery disaster relief funded research. Current plans include a specific, additional opilio pot and trawl sampling project in the summer of 2025, in development from pilot data collected in the summer of 2024. The information is not intended to directly inform assessment model status but will likely improve understanding of stock distribution during the current period of low status and early recovery. We will report findings of this work through the CPT, collaborative research partners, and to the assessment team when the information is available. **Item #4 - Support of and Participation in Opilio Stock Assessment - GMACS support & other modeling reviews** The update we can provide to the assessors is that modeling efforts for the Bering Sea snow crab stock are significantly challenging. The assessment is executed within a GMACs model structure now, but specifications from the model continue with a high level of review from the CPT, SSC, and others and often meet conflicting perspectives on the appropriate path

Non-conformance 2 (of 3)	
	forward. The industry is continuing to offer support and find ways to help improve the assessment, with continued interest to support sustainability for snow crab through the assessment. We can report to the assessment team as new industry support details become available. **Item #5 - Record keeping and reporting for Bering Sea opilio stock - bycatch monitoring** The update for the final component of this action plans is to continue to track bycatch and provide updates on any substantial changes in opilio bycatch occurring in crab or non-crab fisheries in the management area as reported by the September CPT. To our knowledge, there has been no new substantial opilio stock bycatch that we are aware of. The reporting of this will also occur as part of the rebuilding plan monitoring, total mortality estimation within the assessment, and CPT-level reporting on bycatch accounting for all crab stocks. For this update, our plans to share information remain the same – the September CPT report link for 2024 is updated above. Results from the 2024 assessment are summarised in Section 7.4.1. Noting the uncertainty in mating dynamics, the SSC disagreed with the author and CPT and instead recommended using the Tier 3 model 24.1a, with F35% and B35% as proxies for MSY to set the OFL. The SSC further recommended a buffer of 65% between the OFL and ABC, reflecting the potential for very high fishing mortality rates on larger crab if the full OFL were removed from the stock. This buffer is larger than last year and the SSC based the increase on uncertainty in the reproductive capacity of small males, continued concern over issues with the Tier 3 model, the recent large mortality event from which the stock has yet to recover, and the potential for persistent truncation of the size/age structure of male crab. The SSC noted that the use of such a large buffer is a temporary solution, pending additional biological and assessment research (see link provided in non-conformance 1 of Section 8.1.2 above). Based on the SSC recommended model, overfishing is not occurring for snow crab, and the stock is not currently overfished (MMB is above the minimum stock size threshold) but will remain under a rebuilding plan until it has rebuilt to the BMSY level. Accordingly, after two consecutive closed seasons (2022-23 and 2023-24), the fishery was re-opened for the 2024-25 season with a small TAC of 2,140 t which is in accordance with the ADFG Guideline Harvest Level (GHL) that is based on estimated total mature biomass. The recent Bering Sea warm stanza (2014–2021) included unprecedented low sea ice extents in winters 2017/2018 and 2018/2019 with near nonexistent cold pool extents in summers 2018 and 2019. This unprecedented warming resulted in a mass die off due to starvation of a strong year class of undersize snow crab (Szuwalski et al 2023; Litzow et al 2024). The lack of thermal barrier also resulted in northward distributional shifts of groundfish and crab stocks that potentially impacted the food web dynamics and carrying capacity of the northern Bering Sea ecoregion. Since 2021, oceanographic metrics (i.e., sea ice extent, sea surface and bottom temperatures) have cooled to near average based on respective time series. While the summer 2023 cold pool was of moderate extent and among the largest of the past several years, it was significantly below the large cold pool extents that were common prior to the recent warm stanza. The areal extent of the cold pool in the eastern Bering Sea was just below the time series average in 2024 and 12.7% smaller than 2023.54

Non-conformance 2 (of 3)	
	Along with the recent cooling, juvenile snow crab energetic condition has been high relative to the dramatic decline in condition during the 2018-19 population collapse. Also, there have been southward shifts in the centroids of mature male abundance, juvenile snow crab have occupied temperatures < 1°C, and there has been reduced Pacific cod predation, which are consistent with the return of cold water habitat critical for stock rebuilding and recruitment. In addition, a high proportion (90%) of mature females with full clutches suggests increased reproductive capacity despite depressed large male abundance and a heavily female-biased operational sex ratio (Fedewa et al 2024). After the recent population collapse, some sign of small snow crab crab has been observed in the survey and this year's (2024) observed immature female biomass in the survey was the highest on record (link to 2024 EBS snow crab SAFE report is provided in Section 7.4.1). The foregoing ecosystem considerations provide some positive signals for rebuilding this stock.
Progress against the CAP:	Progress against the CAP 2025: Snow crab was declared overfished in 2021, but the 2025 SAFE report did not include a section on "Rebuilding Analysis and Update." The SSC recommends that this section be included in future SAFEs as appropriate. The rebuilding plan for the snow crab stock was implemented in 2023 and the projected target time for rebuilding is 6 years. There was no quantitative evaluation of rebuilding progress for the snow crab stock included in the 2025 SAFE, however, in the CPT discussion it was stated that the stock is making adequate progress toward rebuilding. Nevertheless, results provided in the 2025 SAFE Introduction and in the 2025 snow crab SAFE report provide an indication of progress to date. Observed mature male biomass (MMB) reached an all-time low of 15.49 kt in the 2023 survey. This survey estimate increased to 23.49 kt in 2024 and to 33.17 kt in 2025, the highest since 2019. While significant, for context this recent increase should be considered in relation to historical highs in the 1990s (observed MMB during 1990, 1991, and 1997 were 348.38, 219.72, and 194.36 kt, respectively). Results from analytical modeling provided in the SAFE report demonstrate that the MMB is currently composed predominantly of crabs < 95 mm CW. MMB at time of mating for 2024/25 was 19.0 kt based on sizes > 95 mm and 137.5 kt based on all morphometrically mature males (From tier 3 modeling in Tables 1 and 2 on p. 8 of SAFE report). These results indicate that the MMB is composed of approximately 86% males < 95 mm. The SAFE report (p. 24) provides a further breakdown of the MMB based on application of tier 4 HCRs to survey biomass estimates of three different size ranges: morphometrically mature males, large males (> 95mm), and preferred males (>101mm). The resulting OFLs were 28.41 kt, 8.64 kt, and 6.11 kt for morphometric, large, and preferred males, respectively. These indicate the MMB is made up of ~ 70 % < 95 mm; 9% > 95 < 101 mm; and 21% > 101 mm.

Non-conformance 2 (of 3)	
	Survey observations show a long-term decline in the biomass of large males in the population along with a decline in the size at which males complete their terminal molt. In 2025, 96% of males terminally molted before reaching industry-preferred size, and the size at which 50% of the male snow crab population had undergone terminal molt declined approximately 3 mm from 2024 to 79.0 mm CW. The size at which males undergo the terminal molt to maturity is inversely related to the abundance of large males in the population which suggests that populations with lower densities of large males suffer an increased risk of depressed large male biomass in future years. The 9 lowest observed survey biomasses of commercially preferred sizes occurred in the last 9 years. Under status quo management (TAC decisions based largely on biomass of mature males < 101 mm) and fishing practices (targeting > 101 mm males and discarding smaller), rebuilding favours increasing biomass of small males and is unlikely to achieve levels of large male biomass sufficient to sustain a fishery.
Non-conformance status:	Open – Corrective Actions in place to be reviewed annually at surveillance audits.

Non-conformance 3 (of 3)	
Clause:	12.2.6, Habitat Scoring Element 1, AIGKC UOC
Non-conformance level:	Minor
Non-conformance:	There was not enough evidence to substantiate that the AIGKC Unit of Certification fulfils Habitat Assessment Element 1 of Supporting Clause 12.2.6. More specifically, the assessment team was unable to substantiate: • the spatial footprint (i.e., total area in Km2 or nm2) of the AIGKC fishery on sensitive marine habitats (e.g., based on maps of fishing effort or other data); • the general range of sensitive habitat types (e.g., biogenic habitats) affected and unaffected by the spatial footprint of the AIGKC fishery; and • the percentage area of overlap of the AIGKC fishery with known sensitive habitats including areas known to be rich in structural epifauna/HAPC biota. Note: In the Aleutian Islands, groups considered to be HAPC biota include sea pens, sea whips, corals, anemones, and sponges (RFM Guidance, AK RFM Standard Version 2.1). Also (see Mateo et al., 2022) for evidence considered in the scoring rationale for Supporting Clause 12.2.6.
Rationale:	See above
Corrective Action Plan (CAP):	The client's original Corrective Action Plan was included in the Full Re-Assessment Report (Mateo et al., 2022). The revised Corrective Action Plan (Dec 11, 2024) is shown below. **1) Refine the estimate of coral habitat as presented in last year's summary update.** This will involve some coordination with Dr. Scott Smeltz at Alaska Pacific University (APU) in coordination with Mr. Cory Lescher (cc'd on this email) who will be assisting me and working directly with the Aleutian King Crab Research Foundation. We need to more completely understand how Dr. Smeltz generated his estimate and if a substantial adjustment is warranted. **2) Update the estimation of the fishery footprint, with the latest CPUE and pot lift information that comes directly from the Alaska Department of Fish**

Non-conformance 3 (of 3)	
	and Game. This would include obtaining the lates fishery (seasonal) data and updating an average number of pots lifted, then calculating the footprint of the total of all pot lifts. A final step would be to estimate a range for the fishery footprint by applying a scalar to account for pots moving during retrieval and also for movement of the groundline that tethers the longlined pots. **3) Updating the review of incidence of coral or other sensitive species presence in bycatch data.** This would provide a review of any substantial changes from the approach we've taken over time to review the proportion of observed pots and the associated bycatch of sensitive species.
Progress against the CAP:	Previous corrective actions taken by the client were reviewed during the first and second annual surveillance audits, and progress by the client against the Corrective Action Plan (CAP) was described in detail in the respective surveillance reports (GT 2024, 2025). To summarize briefly, corrective actions have previously been previously evidenced by client submissions of the following: - A summary table showing the number and percentage of AIGKC pots that were observed to contain corals from 2007 to 2022; - Maps showing the distribution of AIGKC fishing effort by fishing area (Western Aleutians Goldens, WAG, and Eastern Aleutians Goldens, EAG) for the three most recent completed seasons (2020/2021, 2021/2022, and 2022/2023); and - A preliminary summary of efforts to estimate the overlap of golden king crab fishery footprint with coral habitat in the Aleutian Islands by utilizing spatial observations of fishery effort and habitat modeling information (Goodman and Smeltz, 2023). The assessment team also notes that since this NC was raised, new information has become available on the extent of fishery impacts to sensitive habitats in the Aleutian Islands. Conrath et al. (2025) estimate that fishery impacts to corals range from 2.6 to 6.4% in the Aleutian Islands, and fishery impacts to sponges range from 2.5 to 6.5% in the Aleutian Islands. It should be noted that these estimates lump together the habitat impacts arising from all fishing activities and gears types - not just those associated with crab pots – and therefore they represent an upper bounds for estimating the potential for habitat impacts attributable to the AIGKC fishery. Despite noted data limitations for crab species including AI golden king crab, Zaleski et al (2024) report that the SSC reviewed the crab Fishing Effects (FE) evaluations and did not find that available information indicated that fishing effects are more that minimal and not temporary for crab EFH. The EFH peer review process was predicated on an impact threshold of < 10% to Core EFH Area (CEA). During the third surveillance audit, the assessment team reviewed the abovementioned information in light of actions taken by the client since the last audit. This included actions described in the client's updated corrective actions (Appendix 2). As follow-up, the team

Non-conformance 3 (of 3)	
	posed two questions about the estimate of overlap of the golden king crab fishery with coral habitat in the Aleutian Islands: 1) Drag Path It appears the calculations are based on the static footprint of traps on the seafloor. Is it possible to account for trap movement that may occur during deployment and/or retrieval (i.e., the drag path)? If so, how large an effect would this have on your estimation of fishery overlap with coral habitat? 2) Coral Focus The analysis seems to be focused exclusively on coral habitat. To what extent can your results be extended to estimate the overlap of the AIGKC fishery footprint with other sensitive habitat types (e.g., sponges) in the Aleutian Islands? The team will revisit these two questions at the next annual surveillance audit. Overall, the team judged client progress to be "on target."
Non-conformance status:	This non-conformance remains open as of the 3rd surveillance audit. Corrective actions are in place and will be reviewed at the next annual surveillance audit.

8.1.3. New non-conformances

There are no new non-conformances raised in this 3rd surveillance.

8.1.4. New or revised corrective action plans

Non-conformance 3 – Habitat Scoring Element 1, AIGKC UOC.
The assessment team reviewed the client's updated corrective actions (Appendix 2) and judged progress to be "on target."

8.1.5. Proposed surveillance activities

The next assessment will be the 4th surveillance assessment. This 4th surveillance assessment will examine progress made in fulfilling the milestones of the corrective action plans.

9. Recommendations for continued certification

9.1. Certification Recommendation

Following this surveillance audit, the Assessment Team recommends that the fishery be awarded continuing certified against CSI RFM Fisheries Standard Version 2.2.

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11. Appendices

11.1. Appendix 1 – Assessment Team Bios

Based on the technical expertise required to carry out this assessment, an Assessment Team was selected as follows.

Ivan Mateo, Ph.D., Lead Assessor
Dr. Ivan Mateo has over 25 years' experience working with natural resources population dynamic modelling. His specialization is in fish and crustacean population dynamics, stock assessment, evaluation of management strategies for exploited populations, bioenergetics, ecosystem-based assessment, and ecological statistical analysis. Dr. Mateo received a Ph.D. in Environmental Sciences with Fisheries specialization from the University of Rhode Island. He has studied population dynamics of data limited economically important species as well as candidate species for endangered species listing from many different regions of the world such as the Caribbean, the Northeast US Coast, Gulf of California, and Alaska. He has done research with NMFS Northeast Fisheries Science Center Ecosystem Based Fishery Management on bioenergetics modelling for Atlantic cod. Dr. Mateo also worked as an environmental consultant in the Caribbean doing field work and looking at the effects of industrialization on essential fish habitats and for the Environmental Defense Fund developing population dynamics models for data poor stocks in the Gulf of California. Dr. Mateo worked as National Research Council post-doctoral research associate at the NOAA National Marine Fisheries Services Ted Stevens Marine Research Institute on population dynamic modelling of Alaska sablefish and early life history/recruitment dynamics of Pacific Ocean perch.

Gerald (Jerry) P. Ennis, Ph.D., Assessor 1.
Following undergraduate and graduate degrees at Memorial University of Newfoundland in the 1960s, Dr. Ennis completed a Ph.D. in marine biology at University of Liverpool in the early 1970s. He retired in 2005 following a 37-year research career with the Science Branch of the Department of Fisheries and Oceans. His extensively published work has focused primarily on lobster fishery and population biology and on various aspects of larval, juvenile and adult lobster behavior and ecology in Newfoundland waters. Throughout his career, Dr. Ennis was heavily involved in the review and formulation of scientific advice for management of shellfish in Atlantic Canada as well as the advisory/consultative part of managing the Newfoundland lobster fishery. In the past decade Jerry has been involved in dozens of crab, lobster and groundfish MSC assessment audits in the US and Canada.

Wesley Toller, Ph.D., Assessor 2
Dr. Wesley Toller has an extensive background in fisheries management and habitat conservation. As owner and operator of his own consulting business since 2010, has worked closely with a number of leading certification schemes including the Marine Stewardship Council (MSC) and Aquaculture Stewardship Council (ASC) to develop and improve processes for auditing and accreditation of sustainability standards. He previously worked as a program manager with Accreditation Services International (ASI) where he helped establish the company's MSC Program. Dr. Toller has an in-depth knowledge of ISO requirements and international best practices that pertain to eco-labelling. He has a detail-oriented work style and wide-ranging interests. Dr. Toller has experience in many subject areas within the field of sustainability and specializes in sustainable use of fishery resources in the field of fisheries management and marine science. Dr. Toller received his doctorate in biological sciences from the University of Southern California. He currently resides in Seattle.

11.2. Appendix 2 – Updated Corrective Actions, Non-Conformance 3 (AIGKC Unit of Certification).

QUANTIFYING THE OVERLAP OF GOLDEN KING CRAB FISHING WITH CORAL HABITAT IN THE ALEUTIAN ISLANDS
Dr. Scott Smeltz (Alaska Pacific University) and Scott Goodman (Bering Sea Fisheries Research Foundation)

14 January 2026

Summary Information

Updated AIGKC Action Plan Item related to fishery effort and coral habitat

This summary provides an update to the prior estimation of AIGKC fishery and coral habitat interaction in response to progress on action plan items to address non-conformances that have been identified for this fishery/habitat interaction. The previous effort provided a first attempt at addressing the overlap, and this update uses similar but corrected methods. The grid cell overlap approach is similar, but the refined consideration of point and line (vector data) for the pots and the strings of pots (spatial fishing effort) provides a more accurate and precise basis to estimate both the overlap of AIGKC pot fishing in coral habitat and an estimate of the coral habitat area. The information provided below is primarily from Dr. Smeltz recent work to re-run the code to compute the overlap, with some brief additions from S. Goodman. Data used in this analysis is both public and confidential, but the tabular summary below is shareable. The most recent fishery pot/string spatial information came from Tyler Jackson (Alaska Department of Fish and Game).

Data sources

Coral habitat data

Coral habitat in the Aleutian Islands was based on the coral species distribution model (SDM) developed by Rooper et al. (2014). The GIS raster layer representing this data were provide to Dr. Smeltz by the authors of that paper. The SDM represents the estimated probability of corals being present over 1 ha grids in regions west of Unimak Island up to 500 m and is based on observations made from NMFS bottom trawl surveys. This data layer is the best available estimate of coral distribution in the Aleutian Islands. Updates to this SDM are currently being produced by NMFS but are not expected to be available until late 2026 at the earliest as part of ongoing Essential Fish Habitat (EFH) work plan updates.

Crab fishing effort data

The distribution of Golden King crab fishing effort was based on daily fishing logs (DFL) recorded by the fleet and was provided to Dr. Smeltz by Scott Goodman (and T. Jackson, ADFG). This data consisted of records of the starting/ending coordinates of a string of pot and the number of pots deployed on the string. These data represent the most comprehensive record of all Golden King crab fishing activity in the Aleutian Islands from 2017 – 2024.

Methods/Results

To estimate the amount of overlap of fishing activity in coral habitat, we used the dimension of a typical crab pot used in the Aleutian Islands (5 ft x 6 ft = 30 ft^2 = 2.78709x10-6 km^2) to convert the number of pot deployments to an area of seafloor contact. The DFL records indicated 366,214 total pots have been deployed from 2017 – 2024, amounting to a total seafloor contact of 1.02 km2 over this time period by this fishery. Note that there is fair amount of variability in the number of pot deployments by year with a downward trend since 2021 (see Table 1 for a table of results by year). The second step of this analysis was to determine the proportion of these pot deployments that were set in coral habitat. Here we used the start/end point of each string of pots to estimate what proportion of the fishery occurred in coral habitat. We defined coral habitat as any 1 ha raster grid cell where the coral SDM predicted probability of corals occurring at >0.5 producing and estimate of 33,872 km^2 of coral habitat. We found that from 2017-2024, a total of 57,224 km of pot strings were deployed by this fishery and that 37,196 km of these deployments occurred in coral habitat, amounting to about 65% of the fisheries effort occurring in coral habitats less than 500 m. While this percentage is high, the actual footprint of computed overlap (potential impact) is low. Applying this proportion to the total area of pots deployed, we estimate that 0.66 km2 of coral habitat has been impacted from 2017 – 2024 which amounts to 0.002% of coral habitat overlapped by Golden King Crab fishing activity. These methods as described use the actual DFL data to estimate the overlap. It is known that the DFL data does not account for all fishery effort due to some data confidentiality and data sharing challenges. The DFL data represents approximately 75% of the documented fishing effort over the period of review so we made a final adjustment to account for estimating a more complete fishery footprint. The AIGKC fishery effort data for the same period reports total effort of approximately 490,000 pots. To estimate the impacted coral habitat from the total of pot lifts, we multiplied the initial estimate in this update by 1.335 to expand the footprint of the DFL as an equivalent to the full fishery. This adjustment increased the estimate to 0.003% of coral habitat overlapped by Golden King Crab fishing activity.

Table 1. Step-by-step calculations used to estimate the area overlap of Golden King crab pots in coral habitats using the DFL data provided and the SDM coral probability layer.

Year	Total[1] number of pot strings deployed	Total string length (km)	String length in coral habitat (km)	Proportion of string length in coral habitat	Total number of pots	Total Pot area (km^2)	Pot area in coral habitat (km^2)[2]
2017	125	553	374	68%	3,737	0.01	0.007
2018	1,341	6,550	4,128	63%	37,726	0.11	0.069
2019	1,793	8,996	6,335	70%	56,750	0.16	0.113
2020	2,192	10,802	7,131	66%	69,161	0.19	0.125
2021	2,306	11,520	7,091	62%	75,476	0.21	0.129
2022	1,677	8,504	5,811	68%	53,020	0.15	0.102
2023	1,255	5,823	3,536	61%	38,577	0.11	0.067
2024	784	4,473	2,790	62%	31,767	0.09	0.056
Total	11,473	57,224	37,196	65%	366,214	1.02	0.663

Conclusions

The overlap of the Golden King crab fishery from 2017 – 2024 with coral habitat in the Aleutian Islands is small; we estimate this fishery to overlap with only 0.002% to 0.003% of coral habitat. This is not unexpected given the small footprint of crab pots relative to the amount of coral habitat in the Aleutian Islands. One caveat to note is

that this analysis only includes coral habitats less than 500 m depths which is the current extent of the best available coral habitat data. We estimated about 9% of the total Golden King crab fishery effort (0.09 km^2 of pot area) is at depths greater than 500 m. Given this relatively small footprint, it is unlikely that extending these analyses beyond 500 m depth would change these conclusions in any substantive manner.

1. The only years with complete data in the daily fishing log (DFL) provided for this analysis are 2021 and 2022.
2. Total coral habitat in the Aleutian Islands estimated to be 33,872 km^2 in depths up to 500 m.

11.3. Appendix 3- Information on NOAA OLE Alaska Enforcement Activities for 2024

Metric / Evidence Item	Details	Fisheries Involved	Enforcement Action	Compliance Interpretation
At-sea boardings	5 boardings conducted	All BSAI crab	N/A	Demonstrates active monitoring presence
Incidents opened	29 total	All	N/A	Routine enforcement review
Incidents closed with no action	16	All	No action / no violation	Indicates strong baseline compliance
Failure to maintain operable VMS	3 cases	BBRKC, WBT–EBT	Compliance assistance; summary settlement	Technical violations; corrective actions applied
Improper gear marking	2 cases	AIGKC, WBT–EBT	Compliance assistance	Low-risk, resolved administratively
Improper personal-use reporting	2 cases	BBRKC, WBT–EBT	Closed LOE	Minor reporting errors
IFQ/IPQ overages	2 cases	BBRKC, AIGKC	Summary settlement; administrative correction	Resolved through established quota procedures
Participation without permit	1 case	NSRKC	Referred	Appropriate escalation for permit issue
Recordkeeping & reporting errors	2 cases	WBT–EBT	Compliance assistance; summary settlement	Administrative corrections completed
Illegal possession – groundfish	1 case	WBT–EBT	Seizure	Serious violation; decisive enforcement

Illegal possession – prohibited species	2 cases	WBT–EBT	Seizure; summary settlement	High-risk category; resolved with sanctions
Total violations documented	17 violations across 13 incidents	All	Mixed actions	No systemic patterns detected