

FOR IMMEDIATE RELEASE

Crab Fishers Push Back Against Delayed Season Opener

ODFW's decision to repeatedly delay the Dungeness crab opener endangers fishers and causes economic harm across Oregon

Newport, Or— January 3, 2023 — A group of Oregon Dungeness crab fishers comprising nearly 10% of the state's permitted commercial fleet sent an open letter this morning to the Oregon Department of Fish and Wildlife strongly criticizing the Department's failure to open the Dungeness crab season along approximately half of Oregon's coast in areas where crab have exceeded meat quality thresholds for several weeks. As the delayed opening enters its second month, the fishers' letter describes in detail how the Department's refusal to open the season has cut off a key economic lifeline to small fishing communities up and down the Oregon coast. The letter also takes sharp aim at the Oregon Dungeness Crab Advisory Committee, which the fishers describe as an "echo chamber" made up of special interests including major processors that benefit from lower prices that predominate after the end of the peak-demand holiday season, at the expense of mom-and-pop businesses and Oregon consumers.

The strong language in the fleet's letter calls ODFW to account for failing to consider the life-safety risks associated with the late start, stating that "[a]s fishers, we understand and accept the calculated risks that are inherent in our profession. The overwhelming majority of us are highly proactive in doing everything in our power to minimize those risks and ensure that we and our crews return home safely to our families. We cannot express strongly enough how disturbed we are that the Department appears unaware and unconcerned that its decision-making this season has directly undercut our efforts." The letter goes on to insist that ODFW open the season no later than January 15, arguing that failing to do so would amount to an "extraordinarily irresponsible" move that "would leave a devastating and likely permanent mark on the composition and integrity of Oregon's Dungeness crab fishery and its fleet."

Perry Bordeaux, who fishes out of Newport and helped organize the effort in the week following the December 22 Advisory Committee meeting that preceded the most recent postponement, said that support for the fishers' position runs even deeper than the large number of fleet members who signed onto the letter on short notice suggests. "I know from my outreach that there are many, many more members of Oregon's fishing fleet who support our position but are not yet comfortable speaking out publicly at this juncture," Bordeaux said. "I expect that as momentum builds in favor of clearer rules regarding the season opener, more and more small to mid-sized crabbers will step up and join our push for more equitable, transparent, and principled decision making at the state level," Bordeaux continued. "The bottom line is that the delays this season have been a disaster for most stakeholders, from consumers, to marine wildlife, to mom-and-pop fishing businesses and the family-wage jobs we support in our coastal communities. The Department needs to understand and appreciate the harm this

unnecessary delay has created so that it can avoid repeating these costly mistakes in the future,”

Garibaldi fisherman and fellow letter signer Levi Cherry agreed. “For me, fresh local Dungeness crab is a holiday staple that Oregonians have enjoyed for generations,” said Cherry. “As a fisherman, I take enormous pride in helping make that tradition possible, and it just crushes me that it didn’t happen this year even though the crab were ready to go across a huge part of the state,” Cherry continued. “The ball was in ODFW’s court, and they dropped it,” Cherry went on, “it’s just a shame, because I feel our regulators are really misinformed about the interests and concerns of the stakeholder community, which is a lot more diverse than just the voices on the Oregon ODCAC,” Cherry said, referring to the Advisory Committee. “I hope our open letter is a first step in a larger dialogue that can give voice to these issues and improve the management of our fishery going forward,” Cherry concluded.

The Oregon Dungeness Crab Advisory Committee is expected to meet again this week, to discuss whether to open the season on January 15 or continue the delay. The decision that follows will no doubt have major ramifications for Oregon fishers and the communities they help support across the state.

Attached is a copy of the signed open letter addressed to Caren Braby, Marine Resources Program Manager at the Oregon Department of Fish and Wildlife.

For further information, contact either Eric Brickenstein at 503-867-2380, Perry Bordeaux at 541-961-7219 or Levi Cherry at 503-801-5319.

OPEN LETTER ON BEHALF OF THE UNDERSIGNED CONSORTIUM OF OREGON DUNGENESS CRAB FISHERS

January 3, 2023

VIA MAIL AND EMAIL

Dr. Caren Braby
Marine Resources Program Manager
Oregon Department of Fish and Wildlife
4034 Fairview Industrial Drive SE
Salem, OR 97302

Re: Delay of Oregon's Dungeness Crab Season Opener

Dear Ms. Braby,

We the undersigned are local fishers and small business owners from across the State of Oregon. Each of us holds an Oregon Dungeness crab permit and owns or operates a commercial vessel of approximately 58 feet or less length-over-all, which is considered a small vessel by the standards of today's West Coast Dungeness crab fleet. Individually and collectively, we are committed to protecting the ecological health and sustainability of Oregon's Dungeness crab fishery, promoting economic equity within the fishery, and ensuring the safety of the men and women who risk their lives harvesting Oregon's signature natural resource.

The purpose of this letter is to express our strong view that areas of the Oregon coast that meet or exceed the meat quality thresholds identified in the 2020 Revised Pre-season Testing Protocol for the Tri-State Coastal Dungeness crab Commercial Fishery (the "Tri-State Protocol") must open no later than January 15, 2023. In addition, this letter explains our deep concern that a lack of clear regulatory standards and diverse viewpoints within the Oregon Dungeness Crab Advisory Committee ("ODCAC") has led to deeply misguided and extraordinarily harmful decision-making by the Oregon Department of Fish and Wildlife ("ODFW" or the "Department") regarding this season's Dungeness crab opener.

I. INTRODUCTION.

There is no question that the Department's repeated refusal to open the fishery along the nearly 180 miles of contiguous Oregon coastline where Dungeness crab have met or exceeded the Tri-State Protocol's thresholds for several weeks has caused severe hardship on multiple fronts. Most importantly, this unjustified delay has directly endangered the lives of fishers – particularly those who fish aboard smaller vessels like ours – who are now virtually certain to face extreme and dangerous conditions at sea during the intense fishing period that immediately follows the season opener. Incredibly, the Department appears to have given no weight

whatsoever to the life-safety of small fishers in connection with its three consecutive decisions to delay the season opening.

This heightened threat to fishers' lives is compounded by the severe economic losses caused by the Departments' decision, which will no doubt compel many small fishers to take the risks necessary to salvage some income from this Dungeness crab season and attempt to meet our financial obligations. In that regard, the Department's abuse of its discretion has deprived us the opportunity to fish and earn a living during the holiday season when demand is at its peak and ex vessel prices are historically as much as \$5 higher per pound than the prices that prevail after the primary holiday markets of Christmas, New Years, and Chinese New Year.

Rather than maximize the value of the fishery while delivering top quality product to meet peak demand through a timely opener, the Department's decision to delay opening until at least January 15 means that the fleet will land its largest volumes during the post-Chinese New Year's slump, when prices often drop 50-75% in a single week, and many of the non-cannery markets simply stop buying for a period of time. This will inevitably lead to further consolidation of crab to the dominant processors that consistently offer the lowest ex vessel prices. The resulting losses to fishers cannot be recovered and will impose severe hardship on small fishers and their families throughout Oregon.

Beyond the fishing community, the Department's refusal to start the season has hurt Oregon consumers by depriving them access this season to fresh local Dungeness crab that is a celebrated holiday staple. Instead, Oregon consumers paid more for less at the seafood counter this year while processors, free from competition from fresh harvest, pushed prior seasons' frozen product at wholesale prices as high as \$12 per pound. The Department's decision has also created ecological risks including to Dungeness crab that will now face peak fishing pressure at the beginning of their molting season, inevitably resulting in increased softshell bycatch and mortality. Migrating whales, whose population increases off Oregon's coast during late winter and early spring, will also face greater risk of entanglement because there will be far more gear in the water this year at a time when fishing pressure would typically have eased.

While the Department's delay of the season opener has been a disaster for small business, Oregon consumers and the environment, it has also made clear winners out of a select group of dominant seafood processors and the massive boats that primarily deliver to them. This group has strong incentives to prioritize a fast high-volume harvest and reaps an enormous benefit from reduced competition that results from a delayed start. Unfortunately, these special interests are vastly overrepresented at the ODCAC, which creates an echo chamber that distorts the Department's understanding of the broader Oregon fishing community's views. The lack of representation and diverse viewpoints on the ODCAC has undoubtedly been a key driver of the Department's serious mismanagement of the Dungeness crab opener this season.

II. The Department's Refusal to Implement a Partial Opener is Contrary to the Tri-State Protocol.

For decades, the Tri-State Dungeness Crab Committee (the "DCC") that is comprised of representatives from ODFW and their agency counterparts from California and Washington has

established a standardized set of pre-season testing criteria that guides member states regarding when and where to open the Dungeness crab fishery each year based on meat recovery. The current Tri-State Protocol is incorporated in Oregon law by reference under Oregon Administrative Rule 635-005-0465.

In 2019, the DCC revised Section VI of the Tri-State Protocol, which addresses the establishment of fishing zones in the event of a delayed coastwide opening due to poor meat recovery rates. The amendments to Section VI became effective in 2020 and specifically contemplate the demarcation of multiple fishing zones to facilitate a so-called “patchwork” or partial opener in the event that significant parts of the West Coast meet or exceed the minimum recovery thresholds. In that regard, the Protocol states explicitly that in this circumstance the states “will” take mutually supportive administrative action to set fishing zones north of Point Arena, California.

The 2020 amendments to the Tri-State Protocol were overwhelmingly supported by Oregon’s fishing community. Unsurprisingly, the Oregon Fish and Wildlife Commission unanimously approved these crucial reforms. The reason for the reforms’ widespread support among stakeholders and regulators is obvious: When significant parts of Oregon’s coast are ready to fish by or shortly after the December 1 start date, a partial opener benefits fishers and consumers alike by creating economic opportunities and ensuring a quality supply of fresh local Dungeness crab during the peak holiday season.

Results from this season’s first round of testing that occurred between November 7 through 10 showed that 100% of the areas between Cape Blanco and the Cascade Head (Harvest Areas 50-J to 50-D) met or exceeded the Tri-State Protocol’s meat quality thresholds. A second round of testing performed between November 29 and December 5 saw the contiguous area of high-quality crab extend as far north as Cape Falcon. This area – which comprises over half the Oregon coast – is more than sufficient to support a partial opening. Nevertheless, after both rounds of successful testing, the Department delayed the opener first to December 15 and then to December 31. Following a December 22 meeting of the Oregon Dungeness Crab Advisory Committee (“ODCAC”) – a body known to be dominated by a small group of interests that does not necessarily represent Oregon’s broader fishing community – the Department delayed the season a third time until (at least) January 15, 2023.

In short, the Tri-State Protocol was modified with the support of regulators and the fishing community to meet precisely the scenario that Oregon is faced with this season. Yet rather than open approximately 180 miles of contiguous Oregon coastline, the Department refused to utilize the Tri-State Protocol’s reforms and instead has imposed three consecutive delays (to date), causing severe hardship to small fishers throughout the state.

III. The Continuing Delay Has Caused Serious Harm on Multiple Fronts.

The Department’s repeated refusal to implement a partial opener has caused severe harm across multiple fronts. We discuss several of the delay’s most problematic effects below:

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1. The delay has hurt Oregon consumers.

Fresh local Dungeness crab is a celebrated Oregon culinary specialty that is traditionally enjoyed during the holiday season. This year, however, Oregonians have been relegated by the delayed opener to celebrating the holidays with frozen crab from prior seasons that is inferior to fresh local crab in flavor, texture, and overall quality. At the same time, the absence of fresh Dungeness crab supply in the local market has allowed processors to impose massive markups as high as 400% on their frozen inventory, leading to higher prices at the seafood counter at a time when widespread inflation is already hitting ordinary Oregonians hard.

Put simply, Oregon consumers who want to enjoy their state's Dungeness crab bounty are paying more for less this season. Meanwhile, large seafood processors are reaping the benefits of reduced competition by imposing historically high resale prices. This market imbalance and the burden it places on Oregon consumers is a direct and completely avoidable consequence of the Department's unjustified failure to implement a partial opening.

2. The delay increased ecological risks to the fishery and marine mammals.

Oregon Dungeness crab typically begin their breeding and molting cycle during the late winter and early spring. The Department's decision to delay opening will inevitably increase fishing pressure during this period, resulting in greater harvest of softshell crab and associated increased mortality. Moreover, the population of migratory whales off Oregon's coast increases substantially during February and March, when the intense fishing pressure that follows the Dungeness season opener has typically slowed. This year, however, there will be far more gear in the water during this period due to the delayed start, increasing the risk of whale entanglement and possible death.

3. The delay creates economic inequity in the fishery.

The economic harm that the delay has caused Oregon's fishing community is hard to overstate. This harm is felt disproportionately by small fishers, many of whom, including several of us, depend heavily on sales the peak holiday season Dungeness harvest to pay our mortgages and meet our living and business expenses. Ex vessel prices to live buyers during peak holiday season have historically been as high as \$10 per lb. Conversely, Dungeness crab markets soften considerably after the holiday season, when fishers' only option may be to sell primarily to large processors at less than a third of that price.

Critically, small fishers are much more affected by market fluctuation than their larger peers. By "small fishers" we mean fishers like us, who own and operate vessels that are 58 feet or less in length-over-all, and that typically hold an average of approximately 10,000 pounds of Dungeness crab. Because small fishers are limited in our catch capacity, we are highly motivated to develop and serve consumer markets such as the live-crab market that prioritize product quality and pay a much higher price per pound. This incentive structure helps diversify Oregon's Dungeness crab market, increases competition, and results in higher tax revenue per pound to the state.

“Large fishers,” on the other hand, own and operate boats as large as 100 feet in length-over-all that can hold between 100,000 and 250,000 pounds of Dungeness crab. The incentive structure that guides these operations differs markedly from smaller boats. Due to their massive hold capacity and ability to fish large areas in all weather conditions, these vessels and their operators tend to prioritize fast harvests and the ability to sell large volumes to the dominant processors quickly, while minimizing their number of trips at sea. For most of these large vessels and their owner/operators, price and product differentiation are secondary to harvest speed and volume. As a result, not only does delaying the opener not cause the same degree of harm to these operators, but they almost certainly benefit from reduced competition caused by a late start.

For small fishers like us, however, the ability to fish during December and early January during the peak demand season that is driven primarily by the Christmas, New Year, and Chinese New Year holidays is critical to our economic survival. Delaying the opener as the Department has done this season limits our harvest opportunities, reduces our markets, and puts us at the mercy of dominant processors who use the post-holiday-season demand decline to justify reduced ex vessel prices and fill their freezers for next season with inexpensive crab. At the same time, the delay puts us at a disadvantage relative to larger boats that can better handle the harsh late season weather and quickly deplete the available biomass.

The hardship that small fishers have suffered due to the ill-advised delay of this season’s opener cannot be undone. But it is important for the Department to understand that the consequences of repeating the mistake of an overly conservative approach to partial opening are clear and catastrophic: This policy will increase the market power of a very small set of already dominant seafood processors; it will reduce diversity in Oregon’s Dungeness crab fleet while consolidating harvest share with a handful of large boats; it will bankrupt small family-owned businesses across the state and eliminate countless family wage jobs; and, in the end, it will diminish and devalue Oregon’s flagship seafood product.

4. The delay threatens the lives and safety of Oregon fishers.

Of the many disastrous effects of the Department’s decision to delay the opener no less than three times this season, the gravest by far is the life-safety risk it creates for Dungeness crab fishers. This risk will be disproportionately felt, again, by fishers aboard smaller boats that are less well-suited to manage harsh winter conditions.

During December, weather off the Oregon coast is generally mild relative to the brutal storms that are much more common during January and February. This December, in fact, saw multiple stretches of ideal crabbing conditions with minimal swell and light wind. Typically, these conditions would coincide with the intensive fishing period that immediately follows the season opener. Due to the Department’s repeated decisions to delay opening, however, the most intensive fishing period of the year will now occur no earlier than the second half of January, when conditions at sea are almost certain to be much more dangerous.

The large vessels that are disproportionately represented on the ODCAC will be mostly unaffected by this change for the simple reason that a 75 to 100-foot boat is capable of managing very high seas in relative safety. Small fishers, on the other hand, will face a daunting choice:

stay home while the large boats rapidly consume the nearly all of the available biomass, or attempt to salvage what little economic opportunity is left this season regardless of the risks. For many of us, the economic reality created by these needless delays and the effects on our markets will in practice leave us no choice at all, and we will put our lives in danger in order to meet our financial obligations and support our families.

As fishers, we understand and accept the calculated risks that are inherent in our profession. The overwhelming majority of us are highly proactive in doing everything in our power to minimize those risks and ensure that we and our crews return home safely to our families. We cannot express strongly enough how disturbed we are that the Department appears unaware and unconcerned that its decision-making this season has directly undercut our efforts. Where the Fisherman's Memorial Walk in Newport alone bears the names of more than 100 local Oregon fishers lost at sea, the increased life-safety risk created by the Department's repeated delay of the season opener must not be ignored.

IV. The Reasons Cited for Continuing the Delay are Inaccurate and Overstated.

Against the harm caused by the Department's refusal to implement a partial opening, the reasons cited during the December 22 ODCAC meeting in favor continuing to delay the season opener statewide are totally insignificant. As we understand it, the Department's concerns boil down to three issues: law enforcement, traceability, and elevated domoic acid in crab viscera in just one of Oregon's 12 regions. We respond briefly to each issue below:

1. A partial opener will not materially impact law enforcement.

The notion that a partial opener would create unmanageable law enforcement conditions is contrary to evidence and experience. In fact, the Oregon State Police ("OSP") has been extremely effective for decades in enforcing lines at Oregon's borders with California and Washington, as well as intrastate lines (including lines at Cape Blanco, Cascade Head, or Cape Falcon that would likely apply to a partial opener this season) established in connection with prior partial openers due to meat recovery or domoic acid closures. OSP's enforcement effort is buoyed by the fact that fishers have a strong vested interest in self-policing and reporting cheaters who fish across boundaries or violate pot limit or fair start rules. These incentives and the longstanding history of effective enforcement in similar settings refute any suggestion that a partial opener would undermine law enforcement.

2. Oregon's traceability measures are more than sufficient to support a partial opener.

The concern that Oregon should not implement a partial opener until certain traceability measures are implemented or modernized is also unfounded. That is because Oregon already has in place robust traceability requirements to ensure that fair start rules are respected and that all Oregon Dungeness crab is identifiable by its zone of origin. For example, each Oregon permit holder is required to submit to an OSP hold inspection before the start of each season that identifies what domoic zone the vessel will fish and with how many pots. Moreover, Oregon has for nearly two decades required each permitted vessel to maintain accurate logbooks that record

the amount and location of its Dungeness crab catch that must be submitted monthly to OSP. Lastly, Oregon's "cradle to grave" fish ticket system ensures that at each step of the supply chain, from the initial ex vessel sale to purchase by a retail seller, the crab is identified by its zone of origin.

3. Domoic acid present in just one of Oregon's 12 testing zones and is readily addressed through a localized evisceration order.

The presence of domoic acid in crab viscera in just one of the State's 12 designated testing zones is no grounds to delay a partial opening that would cover approximately half the state. Even accounting for buffer zone requirements, the domoic acid-affected zone between Cape Blanco and Tahkenitch Creek is just a fraction of the massive area between Cape Blanco and Cape Falcon that exceeds Tri-State Protocol meat quality requirements. More significantly, the affected area can – and should – be opened on an evisceration order.

During the December 22 ODCAC meeting, representatives of large seafood processors complained that fishing on an evisceration order would impact their ability to offer multiple product types. These concerns are, at best, significantly overstated. That is because Oregon's harvest location tracking system enables processors to easily identify crab harvested in an area that is subject to an evisceration order. Under the current situation, crab from the limited zones that are potentially affected could be processed as sections, while crab from the remaining zones that comprise the majority of the proposed open area could be used for other product types including whole-cooked and live crab. In practice, this would create little or no logistical burden on processors, while any fisher who does not want to fish under an evisceration order could simply choose not to do so and maintain protection under the fair start rules.

V. Delaying the Opener Beyond January 15 Would be Extraordinarily Irresponsible.

The Department's repeated refusal to implement a partial opener this season was not warranted and has worked serious undue hardship across multiple fronts. Any further decision to continue the delay beyond January 15 would exacerbate each of these issues to catastrophic effect. As a practical matter, if the Department were to double down on the failed policy of delay that has prevailed this season to date, it would irreversibly destroy many of our small businesses and livelihoods. The Department must open all areas that meet the Tri-State Protocol's meat quality requirements no later than January 15. Any other decision would leave a devastating and likely permanent mark on the composition and integrity of Oregon's Dungeness crab fishery and its fleet.

VI. Reforms Are Needed to Improve Transparency and Consistency in the Management of Oregon's Dungeness Crab Fishery.

The immediate imperative is that Oregon's Dungeness crab season must open no later than January 15. Looking further ahead, it is clear from the events of this season that regulatory reform is needed to improve transparency, foster a more robust discourse at the ODCAC that better reflects the complexity and diversity of interests of the fishery's stakeholders, and to provide clear guidelines regarding when and under what conditions the Department will

implement a partial opening consistent with the Tri-State Protocol. We look forward to engaging these issues with our regulators and fellow stakeholders in the near future.

VII. Conclusion.

In sum, we strongly request that the Department start the Oregon Dungeness crab season no later than January 15, including on a partial basis and/or subject to a local evisceration order as necessary. We also encourage the Department to reassess in hindsight the serious adverse impacts of its decision this season to impose three consecutive delays rather than implement a partial opener, and to consider the lessons to be learned from this experience on a going forward basis. Lastly, we appreciate your attention to our concerns and look forward to working together to achieve lasting improvements to Oregon's Dungeness crab fishery consistent with our shared interest in its equity, sustainability, and safety.

Very truly yours,

Name	Vessel Name	Permit No.	Home Port	Signature
Remy Bordecaud	FV Das Bug		Newport OR	[Signature]
Robert Tubott	FV Kiara Ice II		Newport OR	[Signature]
Blaine McHenry	Little J		Newport OR	[Signature]
Tyler Betnar	Trash Dog		Newport OR	[Signature]
Andy Betnar	PRIORITY ONE		ASTORIA OR	[Signature]
Tyler Betnar	Pursuit		Newport OR	[Signature]
Shawn Packer	ZEPHYR		Newport OR	[Signature]
BRAD Gmuskwa	DAWN TREADER		Newport OR	[Signature]
Len Van Culer	G+L Sealefish	96463	Newport OR	[Signature]
Eric Gage	Salmer Sea		Newport OR	[Signature]
Joe Salvey	Kae Le Belle	96414	Newport OR	Proxy Is Joe Salvey
Daniel Novelli	Novelli's Seafood		Florence OR	Is Daniel Novella
Danell Harper	Sea Lion III		Newport, OR	Proxy Is Danell Harper

cc: Members of the Oregon Fish and Wildlife Commission

Ryan Morgan	FV Ms Nicari		Newport	Is Ryan Morgan
"	Smith Bros II		"	"
"	Cooney Bird		"	"
"	Zephyr		"	"
Nolan Berlin	Wildwood		Garibaldi	Is Nolan Berlin
Dave Rickel	Tiburon		Port Orford	Is Dave Rickel

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Very truly yours,

<u>Name</u>	<u>Vessel Name</u>	<u>Permit No.</u>	<u>Home Port</u>	<u>Signature</u>
<i>Everstar</i>				
<i>Ken Bushnell</i>	<i>Evening Star</i>	<i>515580</i>	<i>garibaldi</i>	<i>Ken Bushnell</i>
<i>Casper Bushnell</i>	<i>Cypress</i>	<i>96054</i>	<i>garibaldi</i>	<i>"</i>
<i>Levi Cherry</i>	<i>Stormyc</i>	<i>10HE9</i>	<i>garibaldi</i>	<i>Levi Cherry</i>
<i>Richard Marcus</i>	<i>Four Winds</i>	<i>106ZB</i>	<i>garibaldi</i>	<i>Richard Marcus</i>
<i>Levi Cherry</i>	<i>Cherry Fisheries</i>		<i>garibaldi</i>	<i>Levi Cherry</i>

cc: Members of the Oregon Fish and Wildlife Commission

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Very truly yours,

<u>Name</u>	<u>Vessel Name</u>	<u>Permit No.</u>	<u>Home Port</u>	<u>Signature</u>
Yuri Praxhoff	Tena C.	96455	GARibaldi	<i>[Signature]</i>
Joel Purkey	Alice Faye		Port Orford	/s Joel Purkey

cc: Members of the Oregon Fish and Wildlife Commission