

# Emergency Transfers of Alaska's Commercial Fisheries Limited Entry Permits, 1975 - 2025

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## **Abstract**

This report provides basic data and background information specific to emergency transfers of Alaska's commercial fisheries limited entry permits. The annual number of emergency transfers is shown by individual fishery and all fisheries combined. Data is provided on the residency status (rural/urban, local/nonlocal, and Alaska/non-Alaska residents) and age of individuals who transfer and receive permits by emergency transfer. Summary information collected from a mandatory survey of the parties who emergency transfer permits is provided, showing the various reason(s) given for transfers, the relationships between the parties to emergency transfers, and the financial terms associated with transfers. The report also provides details on emergency transfer regulations and mentions some of the policy considerations for implementing the regulations.

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## **Acknowledgements**

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## Introduction

In 1972, Alaska's constitution was amended to allow limited entry in the state's commercial fisheries. The following year, in 1973, the Alaska State Legislature enacted Alaska's Limited Entry Act, creating the state's limited entry program and giving the Commercial Fisheries Entry Commission (CFEC or commission) the responsibility of administering the program.<sup>1</sup>

State statutes require that limited entry permits shall be issued only to individuals.<sup>2</sup> Permit holders must renew their permits annually. Most permits are transferable.<sup>3</sup> Transferable permits can be sold, traded, or passed as gifts between individuals. Transferable permits may also be conveyed as an inheritance. To permanently transfer a permit to another individual, the permit holder must file a notice of intent to transfer with CFEC. After a 60-day period following the notice, CFEC can process the permit transfer.<sup>4</sup> To receive a permit, the recipient must demonstrate a present ability to actively engage in the fishery.

In addition to authorizing the permanent transfer of limited entry permits, state statutes also provide a means for the temporary transfer of permits if an unforeseen event prevents the permit holder from fishing, known as an emergency transfer.<sup>5</sup> Emergency transfers allow a permit to be temporarily held and fished by someone other than the permanent permit holder when "... illness, death, disability, required military or government service, or other unavoidable hardship of a temporary, unexpected, and unforeseen nature prevents the transferor from participating in the fishery."

Unless the commission specifies otherwise, an emergency transfer is effective until the nature of the emergency ends, or until the end of the season, whichever comes first. At that point, the permit reverts to the original holder.

Permanent and emergency transfers are governed by state statutes and regulations. CFEC staff must carefully review the terms of each transfer to ensure the transaction conforms to the laws and regulations. Current regulations for emergency transfers can be found at 5 AAC 05.1740 and are shown in full in Appendix F.

## Abbreviations

The following abbreviated terms are defined below and used throughout this document.

*Emergency transfer (ET).* An ET is a temporary assignment of a permit that expires either on the last day of the same calendar year or sooner. An individual who holds an ET permit has all the privileges of participating in the specific fishery allowed by the permit as any other permit holder in the fishery with the same permit type.

*Interim-entry permit (IEP).* An IEP is an interim-use permits issued in a fishery that is under limitation. They are issued to qualified applicants who are awaiting the final determination of their application for a permanent limited entry permit.

*Interim-use permit (IUP).* An IUP is issued annually for all commercial fisheries which are not under entry limitation.

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<sup>1</sup> AS 16.43.100.

<sup>2</sup> AS 16.43.990 (7).

<sup>3</sup> AS 16.43.170.

<sup>4</sup> For permit transfers from estates, the 60-day notice is waived.

<sup>5</sup> AS 16.53.180.

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*Permanent transfer (PT)*. A PT occurs when a permit holder allocates all interest in a permit to another individual.

### General Notes on the Data Presented in the Tables

CFEC issues two general classes of commercial fishing permits: interim permits and limited entry permits. Limited entry permits are issued in fisheries that have undergone limitation. IEPs are issued during the period after the fishery has been limited, but before the application period begins. IEPs are also issued to individuals in limited fisheries during the period when a person's application for a limited permit is being processed. IUPs are issued primarily in open-access fisheries. All CFEC permits are defined by regulation as a distinct finfish or shellfish species (or a combination of several species), a gear type, and an administrative area.

The first limited entry permits were issued in 1975 in nineteen of the state's salmon fisheries. Since then, additional fisheries were limited and by the end of 2025, limited entry permits were issued in 65 fisheries: 26 salmon fisheries; 19 herring fisheries; 9 crab fisheries; 5 sablefish fisheries; 3 shrimp fisheries; and 3 dive fisheries (geoduck, sea cucumber, and sea urchin).

In some limited fisheries, CFEC created more than one permit type to limit increases in fishing efficiency. Some of the permit constraints restrict the amount of gear that can be used, while others limit the length of the vessel. In other fisheries, non-severable permits were issued which combine permissible gear types and/or harvestable species. To date, a total of 79 permit types have been issued in the 65 limited fisheries.<sup>6</sup>

Appendix E lists the state's limited entry fisheries and provides counts of permanent permits initially issued. Appendix E is excerpted from the CFEC report 24-2N *Changes in the Distribution of Alaska's Limited Entry Permits, 1975-2023*.

Some sections of this report provide time-series data for individual fisheries. For example, the first year in the time series of table 4 corresponds to the year when limited entry was adopted and limited permits (either permanent or interim-use) were first issued for the fishery. Normally, the bulk of limited entry permits are issued within the first two years after a fishery is limited but some permits might not be issued for several years if a person's application is denied, and the applicant begins an appeals process. Applicants who are awaiting final adjudication of their permit claims can continue to fish using IUPs during the intervening period. As a result, unless otherwise noted, figures referring to the 'total number of permits' in a fishery represent the combined totals of interim-use and permanent permits for each respective year. On occasion, a person might hold both an IUP and a permanent permit in a fishery in the same year. In these circumstances, the tables count only the permanent permit in the 'total number of permits' category.

Four fisheries were subject to a moratorium on new participants prior to the date when CFEC implemented the fishery's limited entry program. The fisheries and the respective moratorium years include the Southeast Alaska Dungeness crab pot fishery (1992-1996) and the Southeast Alaska sea urchin, sea cucumber, and geoduck dive fisheries (1996-2000). Statutes authorize Emergency Transfers of IUPs in fisheries subject to a moratorium, therefore the moratorium years are included in the tables for these respective permit types.

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<sup>6</sup> By the end of 2025, maximum number regulations had been adopted for 66 limited fisheries. No permanent entry permits have been issued for the Prince William Sound sablefish pot gear fishery; therefore, the permit type does not appear in this report. In addition, 2 fisheries were placed under a vessel limited entry program from 2004. Statutes that enabled the Weathervane scallops permit program was allowed to sunset by the Alaska Legislature in 2013 and Bering Sea Hair Crab permits expired at the end of 2018. Traditional Emergency Transfers were not authorized in the vessel-permit program. A fishery is defined here as the unique combination of species, gear and area.

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Not all limited entry fisheries are shown in the tables specific to permit types. These include Tables 4, 5, 9, and 10. If no Emergency Transfers have occurred in a permit type, it does not appear in the tables.

Data for Table 8 (Relationship of Parties in the Transfer), Table 9 (Reasons for Transfer), and Table 10 (Terms of the Transfer) come primarily from the survey portion of the CFEC ET forms. In a small number of cases, the survey data is incomplete, which accounts for the differences in the totals between these tables and the tables that summarize all Emergency Transfers. ET forms have changed over the years, including the survey questions that were added to the forms in 1994. Many of the statistics in this report are therefore restricted to the years from 1994 through 2025.

### Basic Procedures for Granting an Emergency Transfer

To initiate an emergency transfer, a permit holder completes the CFEC form *Request for Emergency Transfer of Entry Permit* (Appendix G). The form requires the transferor to explain in detail the nature of the emergency, and, if it is a medical emergency, to provide a statement from the examining physician indicating the onset of the condition, the diagnosis, and the treatment.

The parties to an emergency transfer are required to provide the terms of their agreement. They also indicate the status of their relationship. Each party completes his/her respective section; the form is signed by both parties and is notarized.

If the basis for an emergency transfer continues into the following year, CFEC may grant a second transfer for the second year. After the second year, CFEC will not grant an emergency transfer unless the permit holder demonstrates an extraordinary circumstance that is allowable under the regulations.

There are no special provisions under the law authorizing CFEC to issue emergency transfers due to old age or for chronic medical problems. Nor are matters of choice, such as working another job, acceptable under the regulations as reasons for granting an emergency transfer. *Emergency transfers are not authorized due to old age or for chronic medical conditions. A permit holder's decision to do something other than fish (e.g. work another job), is also not an allowable reason for an emergency transfer.*

CFEC staff place a high priority on quickly processing emergency transfers. For example, in 2025, 64.7% of the requested transfers were processed within five days of their receipt at CFEC. In the event of a sudden emergency during the fishing season, a transfer will often be completed immediately by CFEC staff. The recipient of the transferred permit can begin fishing as soon as practicable using a copy of the completed emergency transfer form signed by CFEC staff. The recipient's embossed plastic CFEC permit card is then mailed to them within two days.

If an applicant's request for an emergency transfer is denied by the CFEC Licensing staff, regulations allow the applicant to contest the denial by requesting an administrative hearing before a CFEC paralegal or hearing officer.<sup>7</sup> As a quasi-judicial agency, CFEC hearings are governed by administrative procedural rules, including rules of evidence. Decisions are issued based upon the record. As with all emergency transfers, hearings requested during the fishing season are given high priority and are normally resolved within one to three days. Most hearings are conducted by telephone. Since 1989, CFEC paralegals and hearing officers have addressed an average of 15.7 emergency transfer appeals each year (see Table 1 on the following page).

If an appeal is denied by a hearing officer or paralegal, applicants may appeal again, this time by filing a petition for administrative review to the CFEC commissioners. Relatively few requests for emergency transfers are appealed to the commissioners. However, to ensure consistency with the

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<sup>7</sup> 20 AAC 05.1760.

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governing statutes and regulations, all transfer cases that were brought to a paralegal or hearing officer are eventually reviewed by the commissioners. At their discretion, the commissioners may issue a concurring opinion or overturn the hearing officer’s ruling. In reaching their decision, the commission’s review may also offer clarifications of law or regulations.

Note that many of the appealed decisions have resulted in granting an emergency transfer, but because the final decision has not been written they remain in adjudication status (Table 1).

**Table 1. Administrative Hearings for Requests of Emergency Transfers of Limited Entry Permits, 1989-2025**

Year	Number of Administrative Hearings	Emergency Transfers		
		Granted	Denied, Dismissed, Withdrawn	In Adjudication
1989	30	21	9	0
1990	32	28	4	0
1991	35	33	2	0
1992	17	15	2	0
1993	42	30	12	0
1994	41	25	16	0
1995	38	27	11	0
1996	37	29	8	0
1997	51	37	12	0
1998	38	30	8	0
1999	28	22	6	0
2000	27	22	5	0
2001	13	8	5	0
2002	15	13	2	0
2003	18	13	5	0
2004	7	3	4	0
2005	14	8	6	0
2006	14	11	3	0
2007	13	8	5	0
2008	12	7	5	0
2009	29	15	13	0
2010	29	16	13	0
2011	26	13	13	0
2012	25	10	11	0
2013	45	28	17	0
2014	40	32	8	0
2015	19	12	7	0
2016	24	20	4	0
2017	6	3	3	0
2018	12	7	5	0
2019	26	10	16	0
2020	16	6	10	0
2021	17	10	7	0
2022	11	5	6	0
2023	3	0	0	3
2024	12	2	4	3
2025	18	3	6	3

Note: Data current as of February 25, 2026

## Regulation Changes

Emergency transfers are intended to provide relief to permit holders when they are faced with a temporary hardship that prevents them from fishing. Alaska statutes generally prohibit the leasing of entry permits, but regulations specify exceptions in the case of emergency transfers.<sup>8</sup> The rules provide individuals an opportunity to mitigate some of their difficulty by gaining back a portion of the revenue they lost by not fishing, and, as a policy consideration, help dependents retain their permits over the long term.

Emergency transfer regulations were first adopted in 1975 and are specifically authorized by statute.<sup>9</sup> The basic criteria for a transfer were originally written as follows:

*The commission will grant an emergency transfer if the proposed transferee is presently able to participate actively in the fishery and if the transferor establishes that sickness, injury, or other unavoidable hardship prevents him from participating in the fishery.*

Since then, the regulations have been amended several times with the most significant changes made in the early 1980s. In January 1980, the section was rewritten to specify the terms for the emergency transfer of interim-use permits, and to provide additional examples of unavoidable hardship:

*The commission will grant an emergency transfer of an entry or interim-use permit if the proposed transferee is not a permit holder in the fishery and is presently able to participate actively in the fishery, and if it is established that illness, disability, death, required military or government service, or other unavoidable hardship prevents the transferor from participating in the fishery.*

In January 1983, a new section was added that put limits on granting emergency transfers repeatedly over subsequent years:

*Except for extraordinary circumstances, requests for an emergency transfer in subsequent years will be considered only upon a showing of a new unavoidable hardship of an unexpected and unforeseen nature which prevents the permit holder from fishing.*

In November 1994, a “subsequent years” provision was amended to allow an emergency transfer on the same basis for a second year. Apart from the changes noted above, other minor modifications have been made to the regulations, none of which have significantly altered the basic criteria for an emergency transfer.

## Emergency Transfers of Non-transferable and Interim-use Permits

Some limited entry permits are non-transferable. Under the statutes, when CFEC determines that limited entry is necessary in an open-access fishery, the commission first establishes the maximum number of permits that can be issued. Following the adoption of the maximum number, CFEC develops a point system that ranks individuals who apply for a permit. The point system rankings reflect the relative hardship an applicant would bear if excluded from the fishery. Within the hardship rankings, the agency is required to determine a minor economic hardship point level. Eligible applicants who accrue points at or below the minor economic hardship level are issued non-transferable permits. Non-transferable permits remain valid for the permit holder’s lifetime, but they cannot be passed to other individuals and the permits are permanently forfeited when the permit holder dies. All limited entry permits – both transferable and non-transferable – must be renewed each year and can be revoked if the permit holder fails to renew the permit for two consecutive years.

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<sup>8</sup> AS 16.43.150(g) and 20 AAC 05.1705.

<sup>9</sup> AS 16.43.180 and currently 20 AAC 05.1740; formerly 20 AAC 05.740.

## Introduction

From 1975 through 2025, CFEC issued a total of 16,619 limited entry permits: 14,230 were transferable, and 2,389 were non-transferable.<sup>10</sup>

Emergency transfers of non-transferable permits are permissible, but only under certain conditions consistent with regulations.<sup>11</sup> These requests typically take place during the fishing season and will be granted only to allow the continued operation of a vessel or set gillnet site and fishing gear, or in the case of an underwater dive fishery, the transferor's dive fishing operation.

Interim-use permits issued in limited entry fisheries are also authorized for emergency transfers. State statutes and regulations specify that if a fishery is undergoing a moratorium or limited entry program, and an applicant's status is not yet finalized, CFEC is authorized to grant an emergency transfer of the applicant's interim-use permit.<sup>12</sup> The standard for granting an emergency transfer of an IUP is not as rigorous as that of transferring a standard permanent permit. Under the IUP circumstances, the statute calls for granting an emergency transfer *"...to alleviate hardship."* Moreover, interim-use permits may be transferred repeatedly from one year to the next. It is likely the legislature adopted this more relaxed standard due to concerns that the interim-use permit holder cannot permanently transfer their permit until their permit claim has been made final by the commission.

The more lenient standard for granting emergency transfers for interim-use permits has raised questions in the past. Presently, however, most permit applications have been adjudicated, and there are far fewer instances where these standards might apply.<sup>13</sup>

Moreover, the commission has attempted to contain interim-use emergency transfers by providing the following restrictive definition of hardship in 20 AAC 05.1770(13):

*"hardship," with respect to the emergency transfer of interim-use permits, means privation and suffering, and does not include the results of a permit holder's own economic decisions, nor the results of economic, biological, or regulatory variables which are normally part of the risk of doing business as a fisherman.*

There is a provision in the regulations that allows emergency transfers of interim-use permits in open access fisheries. The transfers would occur only under special circumstances that allow a fishing operation to continue if obtaining another interim-use permit is exceptionally time-consuming or difficult.<sup>14</sup> These circumstances occurred very rarely and were more common when communication technology was less developed.

### Other Emergency Transfers Specifically Authorized by Statute

AS 16.43.180 also authorizes the temporary emergency transfer of entry permits in the event of required military or government service, or if a permit becomes part of an estate due to the death of a permit holder. Regulations allow permits in an estate to be emergency transferred beyond two years, pending the final disposition of the permits.<sup>15</sup>

The statutes that apply to required military or government service were added by the Legislature in 1978, and the definitions for the services are provided in the regulations.<sup>16</sup> Included in this service

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<sup>10</sup> CFEC Report 24-2N-Exec; *Changes in the Distribution of Alaska's Limited Entry Permits, 1975 - 2023*.

<sup>11</sup> 20 AAC 05.1740 (b).

<sup>12</sup> AS 16.43.180 and 20 AAC 05.1740 (a).

<sup>13</sup> As of June 13, 2024, eleven applications were before the commissioners awaiting a final commission decision, and the applicants might qualify for an emergency transfer of their interim-use permit. One additional application was before the commissioners on reconsideration.

<sup>14</sup> 20 AAC 05.1740 (b).

<sup>15</sup> 20 AAC 05.1740 and 05.1750.

<sup>16</sup> § 5 ch 123 SLA 1978 and 20 AAC 05.1770 (a) (11) and (12).

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category are assignments required by law in federal, state, or local governments. This also includes some forms of voluntary service, provided the service is not the permit holder's primary occupation. Most commonly, transfers in this category apply to permit holders who serve on the Alaska Board of Fisheries or in the Alaska Legislature, and who must forgo fishing to serve the State. Military service by persons who serve in the National Guard or other military reserve forces is included.

### Emergency Transfer-Permanent Transfers (ET-PT)

To initiate a *permanent* transfer of an entry permit, a permit holder must first file a *Notice of Intent to Transfer* form with CFEC. After the form is received, there is a 60-day waiting period before the permanent transfer can take place.

Occasionally, emergency (temporary) transfers arise out of situations where two parties have a permit sale agreement, but the required waiting period interferes with the recipient's ability to participate in the fishery. Under these circumstances, CFEC will consider issuing an Emergency Transfer-Permanent Transfer, or ET-PT. The transaction is first processed as a temporary transfer, which allows the recipient to use the permit immediately. Then, at a point in time past the 60-day waiting period, a second transfer is administered to secure the transaction permanently. The permanent transfer typically occurs after the fishing season ends.

An ET-PT is issued by CFEC with strict requirements. The parties to the sale must first submit all the required documents for the eventual sale of the permit. They must also provide a signed statement specifying why the temporary transfer is necessary to avoid lost fishing time due to the 60-day waiting period. The documents are carefully reviewed and validated by the licensing staff before granting and processing the temporary transfer.

Since 1994, CFEC has issued 3,047 ET-PTs. A small number of ET-PTs (92, or 3.2% of the total ET-PTs) failed to result in a permanent transfer between the two parties after the ET was issued. The majority of these were the result of unforeseen and often tragic circumstances for at least one of the parties to the transfer. For example, after an ET is issued the subsequent sale might fall through if the permanent permit holder dies and the permit enters probate. Divorces, accidents, and other personal circumstances might also prevent the intended sale. In some cases, CFEC questioned whether the parties to the transaction were attempting to use an ET-PT to circumvent the medical or true emergency requirements of a traditional emergency transfer. Under these circumstances, CFEC staff require additional information before completing the transfer. It is common for CFEC to deny a request for an ET-PT. As with all denials of permit transfers, the applicants have the right to appeal the denial to a hearing officer.

### Emergency Transfers of Two Years or More

As mentioned, within a fishing season an emergency transfer is effective until the nature of the emergency ends, or until the end of the season (in practice, normally the end of the calendar year), whichever comes first. At that point, the permit defaults to the original holder.

The regulations authorize a second emergency transfer when the condition that prevented the permit holder from participating in the fishery persists and prevent the permit holder from participating in the following year.<sup>17</sup> This portion of the regulations was passed in 1994, although prior to that time commission policy had allowed repeated transfers under certain circumstances.

Allowing two years helps the commission address situations where emergencies might last more than one year, but the nature of the emergency does not prevent an individual from fishing at a point in time in the future.

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<sup>17</sup> 20 AAC 05.1740 (i).

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The conditions under which emergency transfers may extend beyond two years are currently specified as follows:

*(1) a new unavoidable hardship of an unexpected and unforeseen nature that prevents the permit holder from fishing; or*

*(2) a continuation of the basis for the first emergency transfer in addition to extraordinary circumstances; for purposes of this paragraph, “extraordinary circumstances” are circumstances beyond the control of the permit holder that can be addressed by granting an emergency transfer, such as*

*(A) the failure of a good faith attempt to participate in the fishery;*

*(B) a realistic intent to return to the fishery within a reasonable period of time after the first emergency transfer based upon a high probability of removal of the disability or unavoidable hardship that gave rise to the first emergency transfer; or*

*(C) an intent to permanently transfer the permit that cannot presently be fulfilled in spite of substantial, good faith efforts to do so; “extraordinary circumstances” do not include the effects of economic, biological, or regulatory variables that are normally part of the risk of doing business as a fisherman, such as an economic choice, retirement from the fishery, permanent illness or disability, or lack of a market for the sale of a permit.*

This subset of regulations emphasizes extraordinary circumstances and potential hardship faced by permit holders. Using this standard, the commission may review transfers on a case-by-case basis and focus more highly on the nature and extent of a situation that might give rise to an emergency transfer. As a matter of policy, the commission must strike a balance between portions of the law that disallow the leasing of permits and avoids the potential of creating of a class of “absentee landlords” of fishing permits. at the same time, the commission must adhere to other parts of the law that allow emergency transfers, with the goal of serving fishermen and fishing families who have legitimate intentions of remaining in the fishery but who are faced with a temporary hardship.

Following the second grant of an emergency transfer, licensing staff warn the permit holder in writing that future emergency transfers are unlikely to be granted and will only be considered if the applicant can show a new or an extraordinary circumstance.

As previously noted, AS 16.43.180 authorizes continuing emergency transfers for interim-use permits, or for permits that are part of an estate. Permits held by persons who are committed to certain government services are also allowed emergency transfers that might go beyond two years.

Another class of permits that could be emergency transferred for more than two years are those associated with the *Wassillie* court settlement. *Wassillie v CFEC*, was a class action lawsuit where Alaska Native residents predominantly from western Alaska claimed the commission did not adequately notice, advise, and assist them during the original 1975 salmon permit limitation process. In 1988 the lawsuit was eventually settled successfully for the *Wassillie* class members who were allowed to apply for permanent entry permits in the salmon fisheries. By the time the case was settled, and individual claims had been adjudicated, many of the successful applicants were elderly and too disabled to participate in the fishery. The commission allowed these applicants an extraordinary circumstances status to compensate for the years they were excluded from the fishery. This status also allowed successful *Wassillie* applicants to emergency transfer their permits for more than two consecutive years.

## **Number of Emergency Transfers**

Table 2 provides a summary of the number of emergency transfers of limited entry permits for each year since 1975. The total number of permits eligible for an emergency transfer is provided in the second column. This figure includes the sum of all limited entry and interim-use permits that were issued in limited fisheries, plus any interim-use permits that may have been issued in fisheries that were temporarily subject to a moratorium on new entrants. From the 1970s through 2004, as more fisheries came under limitation, the total number of issued permits increased.

Five categories of emergency transfers are shown for each year. The annual rate of emergency transfers is expressed as the total number of emergency transfers relative to the total number of eligible permits that were issued. The rates tended to rise steadily each year from 1975 to 1994, which was the year with one of the highest annual rate of emergency transfers, at 6.5% of all permits. After falling somewhat through the period of the late 1990s to 2002, rates again began to rise and peaked in 2019 at 6.8%. The long-term rate of emergency transfers over the entire 1975-2025 period was 5%.

Table 2 also helps illustrate how the number of emergency transfers steadily rose over time to peak in the years from 1993 through 2000. These years correspond to a period of high earnings in the salmon fisheries statewide. The bulk of emergency transfers occur in the salmon fisheries.

The categories for ET-PT and Government Service do not show any transfers until 1994 and 1995, respectively. This is an artifact of data collection: emergency transfer survey forms did not include a means to track the categories prior to 1994. Although there are no statistics for the categories before 1994, ET-PT and Government Service emergency transfers were in fact granted as far back as the mid-1980s.

Table 2 also provides unique counts of emergency transfers of interim-use permits and permits associated with estates. However, these two categories are not mutually exclusive. In many cases, the death of a permit holder who held an interim-use permit in a limited fishery is good cause for an emergency transfer of his/her permit until the permit holder's estate can be fully settled. Table 3 shows the overlap of the two categories. Within the interim-use permit category, a substantial number of transfers in each year are associated with estates, typically ranging from 7.4% to 9.6% of the total IUP transfers. For the sake of establishing either/or categories, Table 2 groups these blended IUP/Estate transfers into the interim-use permit category.

Appendix A provides similar data, breaking out the information by fishery. The first year in a permit fishery series corresponds to the year when interim-use permits or permanent permits were first eligible for emergency transfer in the fishery.

Number of Emergency Transfers

**Table 2. Summary of Emergency Transfers of Limited Entry Permits for All Fisheries Combined, 1975-2025**

Year	Total Permits Issued <sup>a</sup>	Category of ET					Total ETs	Rate of ETs
		ET-PT	IUPs <sup>b</sup>	Estates	Government Service	All Other		
1975	8,158		113	2		99	214	2.6%
1976	10,427		52	8		246	306	2.9%
1977	10,297		16	15		205	236	2.3%
1978	10,677		32	14		239	285	2.7%
1979	10,690		28	16		292	336	3.1%
1980	13,181		40	13		305	358	2.7%
1981	13,125		63	17		300	380	2.9%
1982	12,975		52	24		333	409	3.2%
1983	13,175		57	44		259	360	2.7%
1984	13,072		63	62		296	421	3.2%
1985	13,251		67	63		339	469	3.5%
1986	13,253		84	63		386	533	4.0%
1987	13,306		97	66		403	566	4.3%
1988	14,074		111	72		410	593	4.2%
1989	14,130		135	78		422	635	4.5%
1990	14,526		124	95		496	715	4.9%
1991	14,324		140	93		554	787	5.5%
1992	14,569		160	96		566	822	5.6%
1993	14,296		138	93		629	860	6.0%
1994	14,236	3	145	78	0	704	930	6.5%
1995	14,493	21	138	86	2	655	902	6.2%
1996	15,561	26	151	60	4	624	865	5.6%
1997	15,665	30	152	70	2	660	914	5.8%
1998	15,708	43	133	72	4	646	898	5.7%
1999	15,456	55	123	63	4	634	879	5.7%
2000	15,321	72	109	86	0	612	879	5.7%
2001	15,298	88	106	54	0	557	805	5.3%
2002	15,191	115	88	46	2	435	686	4.5%
2003	15,122	110	76	41	2	469	698	4.6%
2004	14,857	120	67	46	6	484	723	4.9%
2005	14,817	136	83	51	6	517	793	5.4%
2006	14,751	133	65	36	15	518	767	5.2%
2007	14,637	126	50	46	8	507	737	5.0%
2008	14,519	126	35	64	4	532	761	5.2%
2009	14,503	145	20	60	6	602	833	5.7%
2010	14,480	148	18	78	3	640	887	6.1%
2011	14,433	149	13	72	6	648	888	6.2%
2012	14,290	112	10	70	9	638	839	5.9%
2013	14,248	112	6	68	13	592	791	5.6%

- continued -

Number of Emergency Transfers

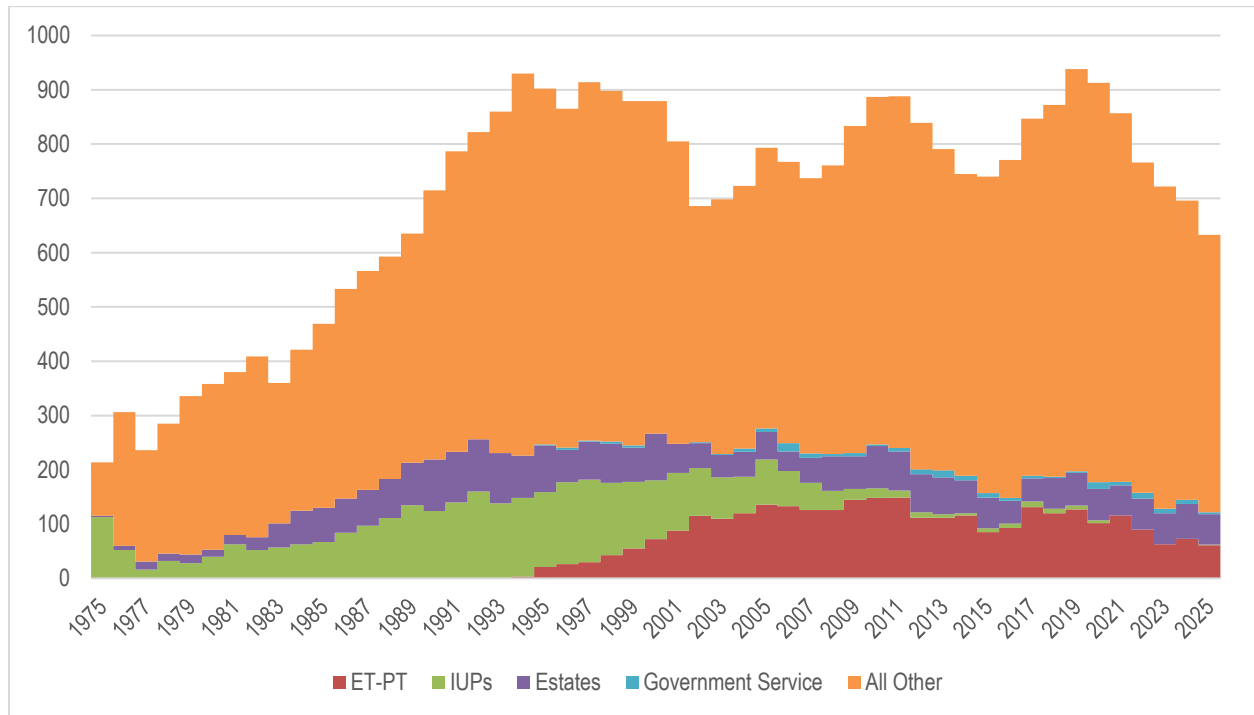
**Table 2. Summary of Emergency Transfers of Limited Entry Permits for All Fisheries Combined, 1975-2025**

Year	Total Permits Issued <sup>a</sup>	Category of ET					Total ETs	Rate of ETs
		ET-PT	IUPs <sup>b</sup>	Estates	Government Service	All Other		
2014	14,214	116	4	61	8	556	745	5.2%
2015	14,120	85	7	57	8	583	740	5.2%
2016	14,045	93	8	42	5	623	771	5.5%
2017	14,031	131	11	42	5	658	847	6.0%
2018	14,013	120	8	57	2	685	872	6.2%
2019	13,880	127	7	60	3	741	938	6.8%
2020	13,851	102	5	58	12	736	913	6.6%
2021	13,813	116	0	55	7	679	857	6.2%
2022	13,762	90	0	57	11	608	766	5.6%
2023	13,713	63	0	57	8	594	722	5.3%
2024	13,657	73	0	64	8	551	696	5.1%
2025	13,591	61	1	56	4	511	631	4.6%

<sup>a</sup> 'Total Permits Issued' represents permits eligible for emergency transfer. It is the sum of all permanent and interim-use permits issued in limited fisheries or in fisheries that were subject to a temporary moratorium on new entrants. If a person held both an interim-use permit (IUP) and a permanent permit in the same year for a fishery, only the permanent permit is counted.

<sup>b</sup> Some emergency transfers of IUPs are the result of a permit holder's mandatory government service, or because the IUP has become part of an estate. In this table, all transfers of IUPs are combined in the 'Interim-use Permits' column. For a detailed breakout of categories of transfers of interim-use permits, see Table 3.

<sup>c</sup> Emergency transfer surveys were not in place prior to 1994; as a result, data for 'ET-PT' and 'Government Service' transfers are not available for those years.



**Figure 1. Summary of Emergency Transfers of Limited Entry Permits for All Fisheries Combined, 1975-2025**

*Number of Emergency Transfers*

Table 3 provides a more detailed breakout of the interim-use permit category of emergency transfer.

**Table 3. Interim-Use Permits (IUPs) in Emergency Transfers, 1975-2025**

Year	Total IUP Emergency Transfers	Interim-use Permit Category		
		Gov't Service	Estate	All Other
1975	113	-	1	112
1976	52	-	2	50
1977	16	-	1	15
1978	32	-	1	31
1979	28	-	4	24
1980	40	-	6	34
1981	63	-	6	57
1982	52	-	7	45
1983	57	-	8	49
1984	63	-	13	50
1985	67	-	22	45
1986	84	-	22	62
1987	97	-	27	70
1988	111	-	38	73
1989	135	-	47	88
1990	124	-	43	81
1991	140	-	41	99
1992	160	-	45	115
1993	138	-	46	92
1994	145	-	48	97
1995	138	-	45	93
1996	151	1	45	105
1997	152	2	47	103
1998	133	1	41	91
1999	123	1	38	84
2000	109	1	33	75
2001	106	1	37	68
2002	88	1	34	53
2003	76	3	32	41
2004	67	2	31	34
2005	83	2	34	47
2006	65	2	25	38
2007	50	2	24	24
2008	35	1	12	22

- continued -

*Number of Emergency Transfers*

**Table 3. Interim-Use Permits (IUPs) in Emergency Transfers, 1975-2025**

Year	Total IUP Emergency Transfers	Interim-use Permit Category		
		Gov't Service	Estate	All Other
2009	20	1	5	14
2010	18	1	4	13
2011	13	1	4	8
2012	10	1	3	6
2013	6	0	2	4
2014	4	1	2	1
2015	7	1	4	2
2016	8	1	4	3
2017	11	1	8	2
2018	8	1	4	3
2019	7	1	2	4
2020	5	1	2	2
2021	0	0	0	0
2022	0	0	0	0
2023	0	0	0	0
2024	0	0	0	0
2025	1	0	0	1

Appendix A shows that, within salmon management areas, set gillnet permits tend to have somewhat higher rates of emergency transfers than other permit types. One notable exception is the set gillnet fishery in Cook Inlet, where the permits have a moderately low average emergency transfer rate of 2.7%.

Among all fisheries, the highest rates of emergency transfers are consistently found in the sablefish longline fisheries in Southern Southeast Alaska, where rates have fluctuated from roughly 5% to 58% of the permits since 2000. For permits in both the Northern and Southern Southeast sablefish fisheries, a substantial number of the emergency transfers were associated with interim- use permits. Emergency transfers of interim-use permits are subject to a somewhat less rigorous standard for approval than permanent permits, as was explained in previous sections. The Southeast king crab fisheries show similar trends to the sablefish fisheries, with relatively high emergency transfer rates, again influenced by a significant number of interim-use permits. Appendix A also shows how individual fisheries can influence statewide statistics on emergency transfers. The combined set and drift gillnet salmon fisheries in Bristol Bay typically represent at least one third of the annual emergency transfers processed by CFEC. Note that these two fisheries typically make up 20% of all permits that can be emergency transferred. The Bristol Bay drift gillnet fishery alone, which has the highest number of permit holders of all limited entry fisheries, frequently accounts for over 200 emergency transfers per year.

Appendix A also shows that some permit types account for minimal or no emergency transfers over lengthy periods of time. These permits usually apply to fisheries that have been closed, either for conservation reasons or due to market conditions. Notable examples include permits for Cook Inlet Dungeness crab, Bristol Bay herring roe on kelp, and the herring fisheries in Prince William Sound and Cook Inlet. Other permits, such as those for the herring fisheries in Western Alaska - Goodnews Bay, Nelson and Nunivak Islands, Cape Romanzof, and Norton Sound – also show very low emergency transfer rates. Again, this is probably due to inconsistent participation in the fisheries, which have been impacted in recent years by market conditions.

## *Number of Emergency Transfers*

The moratorium years in the Southeast Alaska Dungeness crab pot fishery were from 1992 through 1996. Appendix A shows two classes of permits issued for the fishery in those years depending upon the length of the participating vessel: under 50 feet, or 50 feet and over. When the moratorium ended and a limited entry program was implemented in 1997, the regulations created four classes of Dungeness crab permits, each one corresponding to a specific number of allowable pots. As a result, the tables in the fishery-specific sections of this report show Southeast Alaska Dungeness crab permits separated into distinct types for moratorium and post-moratorium years. The Southeast Alaska dive fisheries were also subject to moratoria from 1996 through 2000. However, unlike the Dungeness crab fishery, the permit types for the dive fisheries did not change between the moratorium years and the years following limited entry; the permit designations stayed the same, and the fishery-specific tables reflect this.

There is a separate anomaly with permits for the Southeast Alaska pot shrimp fishery. For the first six years of limited entry from 1996 through 2001, two permit types were issued. By 2002, one of the permit types had been phased out, leaving only the “Southeast shrimp, pot gear” (no vessel length specified) permit type.

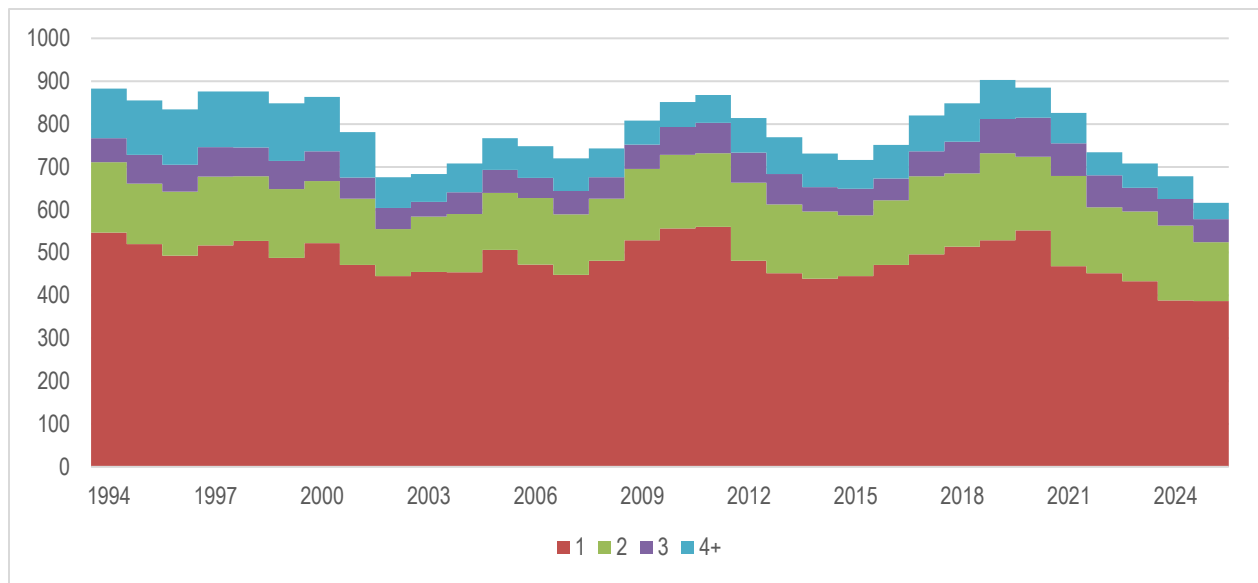
Like Table 2, ‘Total Permits Issued’ in Appendix A represents the sum of interim-use permits and permanent permits that were issued in fisheries that were subject to limited entry. ‘Total Permits Issued’ therefore represents the number of permits that were eligible for emergency transfer in each year. On occasion, a person will hold both an interim-use permit and a permanent permit in a fishery in the same year. In these circumstances, the tables count only the permanent permit in the ‘Total Permits Issued’ column.

## **Emergency Transfers of One or More Years**

Previous sections of this report discuss the circumstances where an individual might be allowed to emergency transfer a permit repeatedly for more than one year. Briefly, emergency transfers are authorized for up to two years if a person has a medical condition that persists into the second year. New and unexpected medical conditions might also give rise to repeated emergency transfers. Required military or other government service, or issues involving the settlement of a permit holder’s estate are other potential reasons where a permit could be emergency transferred across consecutive years. Individuals who hold interim-use permits in limited fisheries might transfer their IUPs for more than one consecutive year, and *Wassillie* class members who received permits were granted a status that allowed them to repeatedly transfer their permits.

Emergency transfers that are used to facilitate a permanent transfer (ET-PT) are often associated with repeat transfers. A common scenario involves individuals who suffer a medical condition(s) that prevents them from fishing for one or two years. Following this, the individual might decide to permanently transfer their permit, but to facilitate the transaction they need to request an ET-PT. This would result in emergency transfers over consecutive years.

Figure 2 shows the number of consecutive years of Emergency Transfers for all limited entry permits from 1994 to 2025.



**Figure 2. Consecutive Years of Emergency Transfers for All Limited Entry Permits, 1994-2025**

Table 4 provides counts of individuals who had emergency transfers, broken out by the number of years in which they made ETs (see Appendix B for a table with the same data by fishery). To assess repeat transfers, the data was examined for each unique person / permit combination. The third column (Year 1) indicates the number of permits that were emergency transferred by persons who did not ET their permit in the preceding year. The fourth column (Year 2) shows the number of unique person/permit combinations that were in their second consecutive year of emergency transfer. The fifth column (Year 3) shows person/permits with three years of repeated emergency transfers, etc.

Note that some permits are emergency transferred to more than one individual in a year. In roughly 1 in 30 occasions, a person will emergency transfer their permit, withdraw the transfer, and issue a second one to a different individual later in the same year. These instances are not included as “repeat

## Emergency Transfers of One or More Years

transfers” in Table 4 because they occur in the same year. This also accounts for the slight differences in the sum of transfers between Table 4 in this section and Table 2 in the previous section.

Note that table 4 estimates repeat permit transfers based on calendar year, not fishing season. Fisheries with seasons that span a change in calendar year will require an emergency transfer to be completed for both calendar years. Most commonly this applies to the salmon hand and power troll fisheries, and the Southeast geoduck dive fishery. For example, to emergency transfer a geoduck dive permit for an entire season, an individual might transfer their permit for the portion of the fishery that occurs in December; then, to continue the ET, they would need to request a second transfer for the remaining part of the season in January of the next year. Transfers of this type will inflate the figures for repeat transfers in table 4.

The time-series in the table extends back to 1994 when the survey portion of the current emergency form began.

On average, about 40% of the emergency transfers in a year were also transferred in one or more of the previous years. The number and percentage of emergency transfers that occurred for four or more continuous years was highest in the mid-1990s and peaked in 1999 at 15.8% to 10.8% of all emergency transfers; this percentage has subsequently dropped to 6.2% in 2025. The decrease might be related to a drop in the number of *Wassillie* class members who held permits, as well as a general reduction in the number of interim-use permits in all fisheries. Emergency transfers of interim-use permits are subject to a less rigorous regulatory standard than emergency transfers of permanent permits and may lead to repeated transfers.

The highest rates of consecutive emergency transfers have been for permits in the Southeast Alaska sablefish fisheries and king crab fisheries. Again, this may be related to a proportionally high number of interim-use permits. Economic returns to permit holders might also influence the rates of emergency transfers, as these fisheries are characterized by relatively high ex-vessel earnings and high permit values.

*Emergency Transfers of One or More Years*

**Table 4. Consecutive Years of Emergency Transfers for All Limited Entry Permit Fisheries, 1994-2025**

Year	Permit/Person Transferors Consecutive Years Transferred			
	1	2	3	4+
1994	547	164	56	116
1995	520	141	67	127
1996	493	149	63	129
1997	517	160	69	130
1998	527	151	67	131
1999	488	160	66	134
2000	522	145	69	127
2001	471	155	49	106
2002	445	110	49	72
2003	455	129	34	65
2004	454	136	51	67
2005	506	133	54	74
2006	472	155	47	74
2007	448	141	55	76
2008	481	145	50	67
2009	529	166	57	56
2010	556	172	65	58
2011	560	172	71	65
2012	481	182	70	81
2013	452	160	71	86
2014	439	157	57	78
2015	445	142	62	67
2016	471	151	51	78
2017	496	182	58	84
2018	514	171	74	89
2019	529	203	80	91
2020	552	172	91	70
2021	468	211	76	71
2022	452	154	74	54
2023	433	163	55	57
2024	388	175	62	53
2025	387	137	54	38
<b>Total</b>	<b>15,498</b>	<b>5,044</b>	<b>1,974</b>	<b>2,671</b>

## **Emergency Transfers by Resident Type and/or Relationship**

This section provides statistics on emergency transfers of permits based upon where the permit holders reside. Permit holders who live in Alaska are classified into rural or urban communities and local or nonlocal groups.<sup>18</sup> Nonresidents of Alaska are classified in a separate category. Each permit then falls into one of five classifications, depending upon the residence of the permit holder:

- **Alaska** resident of a **Rural** community which is **Local** to the fishery for which the permit applies;
- **Alaska** resident of a **Rural** community which is **Nonlocal** to the fishery for which the permit applies;
- **Alaska** resident of an **Urban** community which is **Local** to the fishery for which the permit applies;
- **Alaska** resident of an **Urban** community which is **Nonlocal** to the fishery for which the permit applies;
- **Nonresident** to Alaska.

Table 5 (starting on page 19) shows emergency transfers by resident type. Intra-cohort transfers refer to permit exchanges that occur between persons of the same resident type. Cross-cohort transfers are those that occur between individuals who have different resident types. In 2025 57% of all emergency transfers were between individuals of the same resident-type (intra-cohort).

Permits held by Alaska Rural Locals (ARL) account for the highest number of emergency transfers (ARLs also hold the greatest number of total permits; see Table 5). From 1994 through 2025, 42.3% of all permits emergency transferred were from the ARL resident type. Within the ARL classification, approximately three-fourths (72.9%) of the transfers were to other ARLs, while the remainder of the ARL transfers (27.1%) were cross-cohort transactions where the permits went from ARLs to individuals in one of the other four resident types.

Emergency transfers from nonresidents are the next most numerous class of transfer. Since 1994, Nonresidents transferred 7,429 permits: 66.6% went to other Nonresidents, and 33.4% were transferred to persons with an Alaska residency.

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<sup>18</sup> Rural and urban classifications conform to designations come from the United States Census 2020. Local and nonlocal boundaries closely align with Commercial Fisheries Entry Commission management areas.

Emergency Transfers by Resident Type and/or Relationship

Table 5. Number of Emergency Transfers Between Resident Types, 1994 – 2025

	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
<b>Cross-Cohort</b>																																
<b>From Alaska Rural Local to</b>																																
Alaska Urban Local	8	15	11	8	13	9	11	16	12	6	11	18	11	22	27	20	20	22	11	16	21	17	22	14	17	17	19	15	22	11	15	10
Alaska Urban Non-local	28	30	36	21	20	22	21	16	18	13	15	14	16	17	11	19	21	20	12	16	17	14	12	14	16	21	12	11	18	11	11	14
Alaska Rural Non-local	12	11	16	10	12	13	10	10	10	9	7	4	6	5	4	4	8	9	15	10	18	11	8	7	6	16	17	12	9	7	14	13
Nonresident	73	76	75	77	71	59	53	43	22	25	33	30	26	36	50	58	58	53	59	45	40	51	43	46	34	43	41	42	38	47	40	35
Total	121	132	138	116	116	103	95	85	62	53	66	66	59	80	92	101	107	104	97	87	96	93	85	81	73	97	89	80	87	76	80	72
<b>From Alaska Rural Nonlocal to</b>																																
Alaska Urban Local	0	3	5	2	2	1	0	3	1	2	1	1	1	1	0	0	2	2	1	2	1	1	1	2	0	0	3	2	4	1	0	1
Alaska Rural Local	11	6	10	10	5	7	10	7	8	8	5	3	5	4	6	8	5	8	6	10	8	6	8	8	7	10	7	12	7	5	8	10
Alaska Urban Non-local	11	4	6	4	6	6	2	4	3	3	4	8	8	5	3	3	12	8	9	8	6	2	5	3	10	9	13	14	4	5	11	10
Nonresident	13	10	14	16	14	8	8	6	4	4	8	4	6	5	8	10	23	11	21	23	23	18	21	18	18	16	15	20	12	21	29	15
Total	35	23	35	32	27	22	20	20	16	17	18	16	20	15	17	21	42	29	37	43	38	27	35	31	35	35	38	48	27	32	48	36
<b>From Alaska Urban Local to</b>																																
Alaska Rural Local	12	12	20	24	16	11	20	21	20	15	18	22	21	12	13	16	12	24	22	21	17	25	24	28	19	24	24	21	21	25	15	22
Alaska Urban Non-local	2	1	2	3	3	2	4	0	0	1	1	1	1	2	0	1	1	1	1	0	1	4	4	2	7	5	2	3	4	3	3	1
Alaska Rural Non-local	0	2	2	5	2	0	3	1	2	0	3	2	3	1	1	0	0	1	0	1	1	1	1	1	5	2	3	3	4	4	4	1
Nonresident	6	12	13	14	12	12	12	20	26	24	20	28	25	29	19	14	15	20	26	26	24	33	31	27	31	31	21	20	22	22	29	18
Total	20	27	37	46	33	25	39	42	48	40	42	53	50	44	33	31	28	46	49	48	43	63	60	58	62	62	50	47	51	54	51	42

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Emergency Transfers by Resident Type and/or Relationship

**Table 5. Number of Emergency Transfers Between Resident Types, 1994 – 2025**

	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
<b>Cross-Cohort</b>																																
<b>From Alaska Urban Nonlocal to</b>																																
Alaska Urban Local	7	0	3	1	0	3	1	5	0	2	2	2	1	3	5	0	0	3	1	2	1	2	2	2	1	2	2	2	1	1	2	2
Alaska Rural Local	29	33	25	28	30	31	43	24	23	24	25	34	30	32	18	24	24	17	20	8	19	28	36	26	31	32	22	17	12	17	18	14
Alaska Rural Non-local	12	12	8	12	0	7	2	3	2	3	6	5	6	7	9	3	8	6	4	6	5	5	6	10	4	11	12	12	8	11	10	8
Nonresident	16	19	19	24	21	22	24	18	11	20	19	25	17	21	12	34	30	31	24	24	18	18	24	25	35	37	30	31	27	23	24	30
Total	64	64	55	65	51	63	70	50	36	49	52	66	54	63	44	61	62	57	49	40	43	53	68	63	71	82	66	62	48	52	54	54
<b>From Nonresident to</b>																																
Alaska Urban Local	12	13	5	17	13	18	13	19	23	17	9	23	21	20	15	18	25	30	16	18	21	22	17	23	13	25	24	19	21	16	16	14
Alaska Rural Local	40	31	36	34	40	40	34	31	27	40	34	40	35	35	27	27	33	36	32	27	22	16	31	38	39	38	38	41	40	27	25	28
Alaska Urban Non-local	14	15	9	13	10	13	19	10	5	5	4	8	8	9	17	13	14	12	17	12	15	14	22	23	20	18	31	27	14	18	13	15
Alaska Rural Non-local	17	6	7	11	22	16	18	10	6	9	9	4	9	12	12	7	9	12	11	11	10	3	13	16	9	14	22	27	16	14	14	13
Total	83	65	57	75	85	87	84	70	61	71	56	75	73	76	71	65	81	90	76	68	68	55	83	100	81	95	115	114	91	75	68	70

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Emergency Transfers by Resident Type and/or Relationship

**Table 5. Number of Emergency Transfers Between Resident Types, 1994 – 2025**

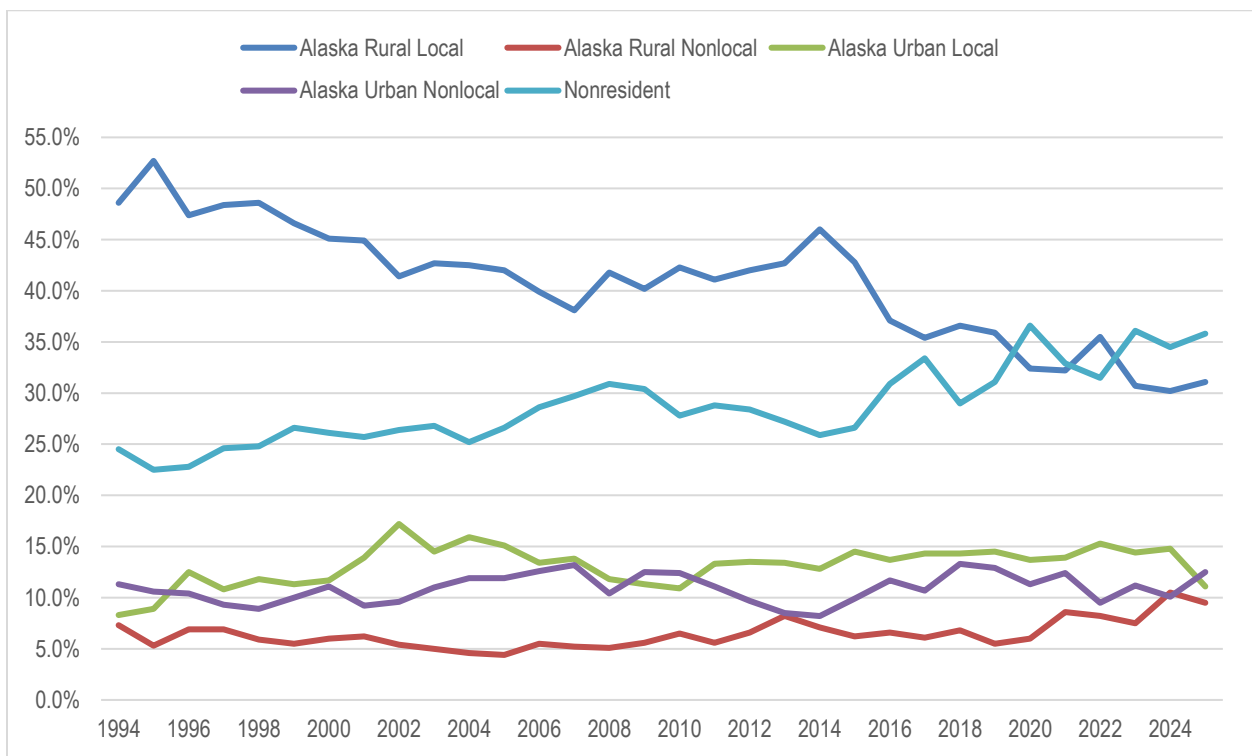
	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
<b>Intra-Cohort</b>																																
<b>Transfers Between</b>																																
Alaska Rural Local	331	343	272	326	320	307	301	276	222	245	241	267	247	201	226	234	268	261	255	251	247	224	201	219	246	240	207	196	185	146	130	124
Alaska Rural Non-local	33	25	25	31	26	26	33	30	21	18	15	19	22	23	22	26	16	21	18	22	15	19	16	21	24	17	17	26	36	22	25	24
Alaska Urban Local	57	53	71	53	73	74	64	70	70	61	73	67	53	58	57	63	69	72	64	58	52	44	46	63	63	74	75	72	66	50	52	28
Alaska Urban Non-local	41	32	35	20	29	25	28	24	30	28	34	28	43	34	35	43	48	42	32	27	18	20	22	28	45	39	36	44	25	29	16	25
Nonresident	145	138	140	150	138	147	145	137	120	116	126	136	146	143	164	188	166	166	162	147	125	142	155	183	172	197	219	168	150	186	172	156
<b>Total</b>	<b>607</b>	<b>591</b>	<b>543</b>	<b>580</b>	<b>586</b>	<b>579</b>	<b>571</b>	<b>537</b>	<b>463</b>	<b>468</b>	<b>489</b>	<b>517</b>	<b>511</b>	<b>459</b>	<b>504</b>	<b>554</b>	<b>567</b>	<b>562</b>	<b>531</b>	<b>505</b>	<b>457</b>	<b>449</b>	<b>440</b>	<b>514</b>	<b>550</b>	<b>567</b>	<b>554</b>	<b>506</b>	<b>462</b>	<b>433</b>	<b>395</b>	<b>357</b>
<b>GRAND TOTAL</b>	<b>930</b>	<b>902</b>	<b>865</b>	<b>914</b>	<b>898</b>	<b>879</b>	<b>879</b>	<b>804*</b>	<b>686</b>	<b>698</b>	<b>723</b>	<b>793</b>	<b>767</b>	<b>737</b>	<b>761</b>	<b>833</b>	<b>887</b>	<b>888</b>	<b>839</b>	<b>791</b>	<b>745</b>	<b>740</b>	<b>771</b>	<b>847</b>	<b>872</b>	<b>938</b>	<b>912</b>	<b>857</b>	<b>766</b>	<b>722</b>	<b>696</b>	<b>631</b>

- The total excludes one emergency transfer from the Department of Commerce, Community, and Economic Development (DCCED).

### Emergency Transfers by Resident Type and/or Relationship

Table 6 and Figure 3 compare the number and percentage of limited entry permit holdings for each resident type (the sum of permanent and interim-use permits that are eligible for emergency transfer) with the resident type’s number and percentage of emergency transfers. The figures again indicate that Alaska Rural Locals hold the highest number of permits. The table also shows that the ARL all-years average rate of emergency transfers closely corresponds with the ARL percentage of permit holdings; however, the relative portion of the total emergency transfers by this resident type has declined somewhat since 1994.

The percentage of emergency transfers from Alaska Urban Locals (AUL) is significantly less than their percentage of total permits, suggesting this resident group tends to emergency transfer their permits at a lesser rate than others. The opposite appears to be true for Nonresidents and for Alaska Urban Nonlocals (AUN): each of these resident types account for a smaller percentage of permit holdings relative to their total emergency transfers.



**Figure 3. Rates of Emergency Transfers by Resident Type of the Transferor, 1994-2025**

*Emergency Transfers by Resident Type and/or Relationship*

**Table 6. Permit Holdings, Emergency Transfers, and Corresponding Percentages by Resident Type, 1994-2025**

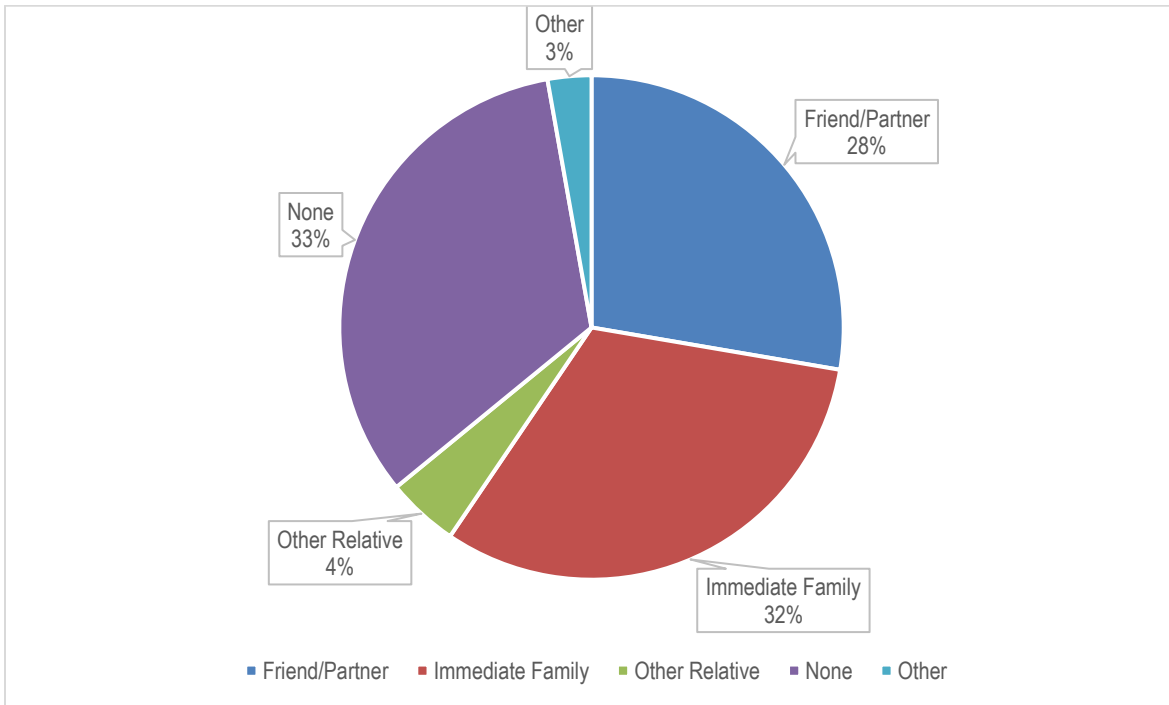
Year	Total		Alaska Rural Local				Alaska Rural Nonlocal				Alaska Urban Local				Alaska Urban Nonlocal				Nonresident			
	Permits <sup>a</sup>	ETs <sup>b</sup>	Permits	% of permits	ETs	% of ETs	Permits	% of permits	ETs	% of ETs	Permits	% of permits	ETs	% of ETs	Permits	% of permits	ETs	% of ETs	Permits	% of permits	ETs	% of ETs
1994	14,228	930	6,714	47.2%	452	48.6%	799	5.6%	68	7.3%	2,552	17.9%	77	8.3%	998	7.0%	105	11.3%	3,165	22.2%	228	24.5%
1995	14,488	902	6,834	47.2%	475	52.7%	822	5.7%	48	5.3%	2,606	18.0%	80	8.9%	1,006	6.9%	96	10.6%	3,220	22.2%	203	22.5%
1996	15,555	865	7,226	46.5%	410	47.4%	882	5.7%	60	6.9%	2,984	19.2%	108	12.5%	1,011	6.5%	90	10.4%	3,452	22.2%	197	22.8%
1997	15,654	914	7,327	46.8%	442	48.4%	866	5.5%	63	6.9%	2,994	19.1%	99	10.8%	1,008	6.4%	85	9.3%	3,459	22.1%	225	24.6%
1998	15,692	898	7,272	46.3%	436	48.6%	974	6.2%	53	5.9%	2,946	18.8%	106	11.8%	1,043	6.6%	80	8.9%	3,457	22.0%	223	24.8%
1999	15,440	879	7,133	46.2%	410	46.6%	949	6.1%	48	5.5%	2,891	18.7%	99	11.3%	1,069	6.9%	88	10.0%	3,398	22.0%	234	26.6%
2000	15,305	879	7,033	46.0%	396	45.1%	927	6.1%	53	6.0%	2,848	18.6%	103	11.7%	1,100	7.2%	98	11.1%	3,397	22.2%	229	26.1%
2001	15,273	804	6,892	45.1%	361	44.9%	955	6.3%	50	6.2%	2,826	18.5%	112	13.9%	1,133	7.4%	74	9.2%	3,467	22.7%	207	25.7%
2002	15,137	686	6,789	44.9%	284	41.4%	934	6.2%	37	5.4%	2,815	18.6%	118	17.2%	1,117	7.4%	66	9.6%	3,482	23.0%	181	26.4%
2003	15,047	698	6,683	44.4%	298	42.7%	919	6.1%	35	5.0%	2,865	19.0%	101	14.5%	1,140	7.6%	77	11.0%	3,440	22.9%	187	26.8%
2004	14,773	723	6,523	44.2%	307	42.5%	880	6.0%	33	4.6%	2,798	18.9%	115	15.9%	1,143	7.7%	86	11.9%	3,429	23.2%	182	25.2%
2005	14,751	793	6,459	43.8%	333	42.0%	886	6.0%	35	4.4%	2,805	19.0%	120	15.1%	1,177	8.0%	94	11.9%	3,424	23.2%	211	26.6%
2006	14,701	767	6,401	43.5%	306	39.9%	910	6.2%	42	5.5%	2,804	19.1%	103	13.4%	1,154	7.8%	97	12.6%	3,432	23.3%	219	28.6%
2007	14,615	737	6,374	43.6%	281	38.1%	897	6.1%	38	5.2%	2,745	18.8%	102	13.8%	1,164	8.0%	97	13.2%	3,435	23.5%	219	29.7%
2008	14,506	761	6,324	43.6%	318	41.8%	923	6.4%	39	5.1%	2,721	18.8%	90	11.8%	1,148	7.9%	79	10.4%	3,390	23.4%	235	30.9%
2009	14,489	833	6,245	43.1%	335	40.2%	943	6.5%	47	5.6%	2,714	18.7%	94	11.3%	1,150	7.9%	104	12.5%	3,437	23.7%	253	30.4%
2010	14,472	887	6,244	43.1%	375	42.3%	969	6.7%	58	6.5%	2,711	18.7%	97	10.9%	1,155	8.0%	110	12.4%	3,393	23.4%	247	27.8%
2011	14,428	888	6,207	43.0%	365	41.1%	961	6.7%	50	5.6%	2,724	18.9%	118	13.3%	1,153	8.0%	99	11.1%	3,383	23.4%	256	28.8%
2012	14,286	839	6,140	43.0%	352	42.0%	950	6.6%	55	6.6%	2,730	19.1%	113	13.5%	1,123	7.9%	81	9.7%	3,343	23.4%	238	28.4%
2013	14,243	791	6,121	43.0%	338	42.7%	958	6.7%	65	8.2%	2,718	19.1%	106	13.4%	1,131	7.9%	67	8.5%	3,315	23.3%	215	27.2%
2014	14,211	745	6,105	43.0%	343	46.0%	970	6.8%	53	7.1%	2,730	19.2%	95	12.8%	1,125	7.9%	61	8.2%	3,281	23.1%	193	25.9%
2015	14,117	740	6,036	42.8%	317	42.8%	966	6.8%	46	6.2%	2,727	19.3%	107	14.5%	1,098	7.8%	73	9.9%	3,290	23.3%	197	26.6%
2016	14,042	771	5,952	42.4%	286	37.1%	946	6.7%	51	6.6%	2,751	19.6%	106	13.7%	1,100	7.8%	90	11.7%	3,293	23.5%	238	30.9%
2017	14,025	847	5,967	42.5%	300	35.4%	943	6.7%	52	6.1%	2,728	19.5%	121	14.3%	1,126	8.0%	91	10.7%	3,261	23.3%	283	33.4%
2018	14,007	872	5,985	42.7%	319	36.6%	954	6.8%	59	6.8%	2,710	19.3%	125	14.3%	1,109	7.9%	116	13.3%	3,249	23.2%	253	29.0%
2019	13,873	938	5,921	42.7%	337	35.9%	959	6.9%	52	5.5%	2,677	19.3%	136	14.5%	1,109	8.0%	121	12.9%	3,207	23.1%	292	31.1%
2020	13,844	913	5,868	42.4%	296	32.4%	959	6.9%	55	6.0%	2,699	19.5%	125	13.7%	1,123	8.1%	103	11.3%	3,195	23.1%	334	36.6%
2021	13,808	857	5,808	42.1%	276	32.2%	983	7.1%	74	8.6%	2,694	19.5%	119	13.9%	1,125	8.1%	106	12.4%	3,198	23.2%	282	32.9%
2022	13,758	766	5,779	42.0%	272	35.5%	1,008	7.3%	63	8.2%	2,659	19.3%	117	15.3%	1,134	8.2%	73	9.5%	3,178	23.1%	241	31.5%
2023	13,708	722	5,720	41.7%	222	30.7%	1,010	7.4%	54	7.5%	2,650	19.3%	104	14.4%	1,166	8.5%	81	11.2%	3,162	23.1%	261	36.1%
2024	13,652	696	5,667	41.5%	210	30.2%	1,010	7.4%	73	10.5%	2,642	19.4%	103	14.8%	1,176	8.6%	70	10.1%	3,157	23.1%	240	34.5%
2025	13,587	631	5,592	41.2%	196	31.1%	1,025	7.5%	60	9.5%	2,627	19.3%	70	11.1%	1,179	8.7%	79	12.5%	3,164	23.3%	226	35.8%
Total	463,715	25,972	203,341	43.9%	10,648	41.0%	30,037	6.5%	1,669	6.4%	88,091	19.0%	3,389	13.0%	35,693	7.7%	2,837	10.9%	106,553	23.0%	7,429	28.6%

- a) 'Total permits' represents all permits eligible for emergency transfers. It is the sum of permanent and interim-use permits issued in limited fisheries or in fisheries that were subject to a temporary moratorium on new entrants. If a person held both an interim-use permit (IUP) and a permanent permit in the same year for a fishery, only the permanent permit is counted. 'Total permits' excludes a small number of permits that were temporarily held by the Department of Commerce, Community, and Economic Development (DCCED) at year-end.
- b) 'Total Emergency Transfers' excludes one emergency transfer in 2001 from DCCED.

### Emergency Transfers by Resident Type and/or Relationship

Figure 4 and table 7 show the relationships of the parties involved in emergency transfers. The data indicates that roughly two-thirds of all emergency transfers have occurred between individuals who know one another. On average across all fisheries, 36% of the emergency transfers have been between family members (the sum of Immediate Family and Other Relative), and 28% occurred between Friends/Partners.

Note that Table 7 shows only the years when emergency transfers occurred for each permit type. If no emergency transfers occurred for a particular permit type and year, it is excluded from the table.



**Figure 4. Relationship of Emergency Transferors to Transfer Recipients, 1994-2025**

*Emergency Transfers by Resident Type and/or Relationship*

**Table 7. Relationship of Emergency Transferors to Transfer Recipients for All Permit Fisheries with ET Surveys**

Year	Friend/Partner		Immediate Family		Other Relative		None		Other		Unanswered		Total
	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent	
1994	132	26.4%	160	32.0%	28	5.6%	90	18.0%	87	17.4%	3	0.6%	500
1995	277	30.7%	291	32.3%	46	5.1%	224	24.9%	16	1.8%	47	5.2%	901
1996	227	26.2%	287	33.2%	38	4.4%	228	26.4%	15	1.7%	70	8.1%	865
1997	268	29.3%	306	33.5%	63	6.9%	248	27.1%	13	1.4%	16	1.8%	914
1998	286	31.8%	302	33.6%	60	6.7%	226	25.2%	10	1.1%	14	1.6%	898
1999	264	30.0%	295	33.6%	56	6.4%	237	27.0%	18	2.0%	9	1.0%	879
2000	278	31.6%	301	34.2%	53	6.0%	226	25.7%	13	1.5%	8	0.9%	879
2001	267	33.2%	266	33.0%	44	5.5%	206	25.6%	15	1.9%	7	0.9%	805
2002	207	30.2%	252	36.7%	46	6.7%	168	24.5%	8	1.2%	5	0.7%	686
2003	224	32.1%	251	36.0%	44	6.3%	164	23.5%	10	1.4%	5	0.7%	698
2004	212	29.3%	264	36.5%	45	6.2%	180	24.9%	16	2.2%	6	0.8%	723
2005	245	30.9%	276	34.8%	47	5.9%	188	23.7%	15	1.9%	22	2.8%	793
2006	244	31.8%	263	34.3%	36	4.7%	194	25.3%	18	2.3%	12	1.6%	767
2007	214	29.0%	252	34.2%	25	3.4%	221	30.0%	14	1.9%	11	1.5%	737
2008	242	31.8%	244	32.1%	31	4.1%	219	28.8%	17	2.2%	8	1.1%	761
2009	220	26.4%	287	34.5%	29	3.5%	271	32.5%	17	2.0%	9	1.1%	833
2010	217	24.5%	306	34.5%	43	4.8%	289	32.6%	18	2.0%	14	1.6%	887
2011	229	25.8%	301	33.9%	45	5.1%	295	33.2%	8	0.9%	10	1.1%	888
2012	233	27.8%	267	31.8%	47	5.6%	277	33.0%	10	1.2%	5	0.6%	839
2013	248	31.4%	240	30.3%	36	4.6%	252	31.9%	15	1.9%	0	0.0%	791
2014	200	26.8%	227	30.5%	22	3.0%	263	35.3%	33	4.4%	0	0.0%	745
2015	205	27.7%	229	30.9%	38	5.1%	247	33.4%	21	2.8%	0	0.0%	740
2016	209	27.1%	220	28.5%	30	3.9%	279	36.2%	28	3.6%	5	0.6%	771
2017	238	28.1%	218	25.7%	29	3.4%	327	38.6%	24	2.8%	11	1.3%	847
2018	239	27.4%	270	31.0%	18	2.1%	315	36.1%	27	3.1%	3	0.3%	872
2019	274	29.2%	231	24.6%	22	2.3%	365	38.9%	40	4.3%	6	0.6%	938
2020	286	31.3%	216	23.7%	23	2.5%	363	39.8%	19	2.1%	6	0.7%	913

- continued -

*Emergency Transfers by Resident Type and/or Relationship*

**Table 7. Relationship of Emergency Transferors to Transfer Recipients for All Permit Fisheries with ET Surveys**

Year	Friend/Partner		Immediate Family		Other Relative		None		Other		Unanswered		Total
	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent	
2021	260	30.3%	178	20.8%	31	3.6%	346	40.4%	31	3.6%	11	1.3%	857
2022	240	31.3%	171	22.3%	11	1.4%	313	40.9%	25	3.3%	6	0.8%	766
2023	220	30.5%	148	20.5%	11	1.5%	285	39.5%	30	4.2%	28	3.9%	722
2024	213	30.6%	135	19.4%	11	1.6%	287	41.2%	31	4.5%	19	2.7%	696
2025	169	26.8%	115	18.2%	18	2.9%	299	47.4%	22	3.5%	8	1.3%	631

Note: Figures in this table reflect data collected from the survey portion of the CFEC emergency transfer form. The survey was first implemented in 1994. During the transition, 431 emergency transfers were processed without surveys, which accounts for differences in the totals between this table and other tables in this report.

**Ages of Permit Holders in Emergency Transfers**

Table 8 and Appendix D use CFEC permit data to examine the ages of persons involved in emergency transfers. Statistics are shown for both the transferor (permanent permit holder or IUP holder) and for the transfer recipient (temporary holder of the permit in an emergency transfer).

The data indicates that individuals who receive permits via emergency transfer tend to be considerably younger than the persons who transfer the permits. Averaged over all years and across all fisheries, the difference is 16.9 years (Table 8). The average age of emergency transferors has gradually increased over time, as indicated in Figure 5, and currently stands at 55.8 years in 2025. This increase in age follows a general pattern observed throughout the state: the average age for all limited entry permit holders has steadily increased since 1980, and now stands at 56 years.<sup>19</sup>

Permit types that show a significant variance from the overall average (which also have a moderately high number of emergency transfers) include permits for the Southeast Alaska sablefish and salmon purse seine fisheries, and the combination king crab pot fisheries. For each of these permit types, the average age of people who emergency transferred their permits is relatively high (60 years and older). This contrasts with fisheries where the permit transferors tend to be younger, such as the Southeast sea cucumber dive fishery, the Kodiak salmon set gillnet, and Kuskokwim salmon gillnet fisheries (46 years and under). Note that individual permit holders’ ages are confidential. If fewer than four emergency transfers occurred in a fishery, the average age is redacted and marked with an asterisk in Table 8 and Appendix D.

**Table 8. Ages of Emergency Transferors (From) and Emergency Transfer Recipients (To) for All Permit Fisheries, 1994-2025**

Year	Number of		Mean Ages		Difference
	Permits	ETs	From	To	
1994	14,230	926	49.5	34.8	14.7
1995	14,489	898	50.6	34.8	15.7
1996	15,517	856	50	35.4	14.7
1997	15,565	914	50.8	34.9	15.9
1998	15,619	898	51.3	35.9	15.4
1999	15,378	879	52.4	36	16.4
2000	15,242	879	51.5	36.8	14.7
2001	15,220	804	51.2	36.2	15
2002	15,104	686	53.1	36.4	16.7
2003	15,035	698	52.3	36.6	15.8
2004	14,770	723	53.1	36.8	16.2
2005	14,731	793	53.2	36.6	16.7
2006	14,665	767	52.5	36.1	16.4
2007	14,552	737	53.3	36.2	17.1
2008	14,434	761	54.2	35.4	18.7

- continued -

<sup>19</sup> CFEC Report 23-03N-Exec; *Changes in the Distribution of Alaska’s Limited Entry Permits, 1975-2024 (Executive Summary)*.

*Ages of Permit Holders in Emergency Transfers*

**Table 8. Ages of Emergency Transferors (From) and Emergency Transfer Recipients (To) for All Permit Fisheries, 1994-2025**

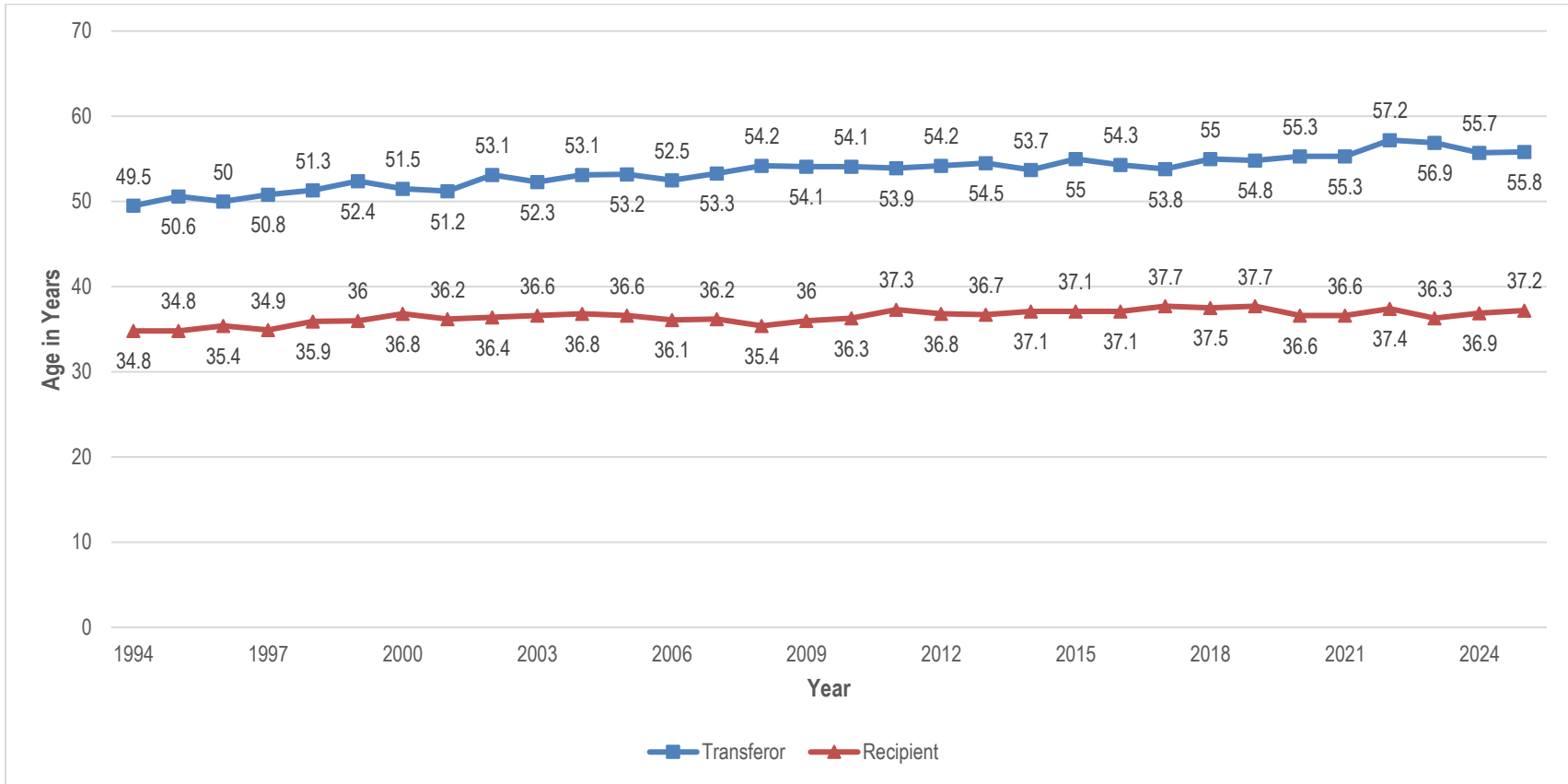
Year	Number of		Mean Ages		Difference
	Permits	ETs	From	To	
2009	14,418	833	54.1	36	18.2
2010	14,396	887	54.1	36.3	17.9
2011	14,349	888	53.9	37.3	16.6
2012	14,207	839	54.2	36.8	17.3
2013	14,165	791	54.5	36.7	17.8
2014	14,131	745	53.7	37.1	16.6
2015	14,037	740	55	37.1	17.9
2016	13,964	771	54.3	37.1	17.2
2017	13,950	847	53.8	37.7	16.1
2018	13,932	872	55	37.5	17.5
2019	13,799	938	54.8	37.7	17.1
2020	13,770	913	55.3	36.6	18.7
2021	13,732	857	55.3	36.6	18.7
2022	13,681	766	57.2	37.4	19.8
2023	13,632	722	56.9	36.3	20.6
2024	13,576	696	55.7	36.9	18.7
2025	13,510	631	55.8	37.2	18.6
<b>Total</b>		<b>25,955</b>	<b>53.4</b>	<b>36.5</b>	<b>17</b>

Notes:

- a) Age and birthdate information is confidential. Data is redacted with an asterisk if there are fewer than 4 emergency transfers.
- b) Permit fisheries with no emergency transfers are excluded from the table.
- c) If the first year in a permit fishery series is after 1994, the year corresponds to when limited entry was implemented and permits were first eligible for emergency transfer.
- d) 'Number of permits' is the sum of permanent and interim-use permits that were eligible for emergency transfer in limited fisheries or in fisheries that were subject to a moratorium on new entrants. If a person held both an interim-use permit and a permanent permit in the same year for a fishery, only the permanent permit is counted. One emergency transfer in 2001 from DCCED is excluded from the totals.

Ages of Permit Holders in Emergency Transfers

Figure 5. Average Age of Emergency Transferors and Transfer Recipients, 1994-2025



## **Reasons for Emergency Transfers and Terms of Transfer**

As detailed in previous sections, emergency transfers allow an entry permit to be temporarily fished by someone other than the permanent permit holder if illness, death, disability, required military or government service, or other unavoidable hardship occurs unexpectedly and temporarily.

Restricting the scope of how permits may be used by someone other than the permanent permit holder is necessary to align provisions for emergency transfers with other statutes that specify that an entry permit should be held only by persons who presently have the ability to participate in the fishery.<sup>20</sup> Emergency transfers are intended to provide relief to persons who are actively engaged in a fishery but who are faced with a temporary and unplanned difficulty that prevents them from fishing.

One requirement for the emergency transfer of a permit is for the parties to complete the CFEC form *Request for Emergency Transfer of Entry Permit*. To complete the transfer form, the applicant must supply detailed and corroborating information that indicates the nature of the emergency. If the reason relates to a medical condition, the applicant must also include a statement from a doctor. Along with the detailed information, one section of the emergency transfer form asks permit holders to select one of eleven categories of “Reason for Transfer”. Table 9 summarizes that information.

An analysis of the survey questions on the emergency transfer form should consider that each transfer is not only reviewed to ensure that it conforms to the regulations as well as its situational merits. Specific and unique facts define each transfer, beyond what is summarized by the survey questions. It is common that in upholding the regulations, licensing staff ask for more information. It is also common practice for CFEC staff to deny a transfer, but at the same time encourage the permit holder to ask for a review by a hearing officer, where the nuances of the transfer can be more properly considered.

The following are notes that help explain the “Reasons for Transfer” selections on the emergency transfer form, as summarized in table 9 (page 33).

### **Medical Necessity: Injury or Accident / Illness or Other Health Problem / Pregnancy**

The combined sum of these causes makes up slightly more than two-thirds (70%) of the reasons given for emergency transfers in 2025. Approximately one-half (40.6%) of all emergency transfers in 2025 were for illnesses or other health problems (including those involving immediate family members). If an immediate family member requires the care or attention of a permit holder due to an unexpected illness or medical condition, this might constitute grounds for an emergency transfer. Note that “Immediate family member” is defined in regulation.<sup>21</sup> Accidents or injuries account for another 24.4%, and pregnancy is listed for 5.4% of the emergency transfers in 2025.

To establish grounds for an emergency transfer due to medical reasons, the transferor must provide a sworn statement from an examining physician indicating the onset of the condition, the diagnosis, and the treatment. This information helps the commission’s review of the transfer request to ensure that the medical condition prevents the permit holder from fishing.

### **Death of the Permit Holder or of an Immediate Family Member of the Permit Holder**

The sudden death of a permit holder is grounds for the family or permit holder’s estate to emergency transfer the permit. Permits that are part of an estate may be emergency transferred beyond two years, pending the final disposition of the permit. To authorize continuing transfers in this category,

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<sup>20</sup> AS 16.43.170.

<sup>21</sup> 5 AAC 05.1770 (a)(10)

## *Reasons for Emergency Transfers and Terms of Transfer*

CFEC staff currently request documentation of the settlement status of the estate. A death of a permit holder's immediate family member can also be a valid reason for an emergency transfer.

### *Required Government or Military Service*

As discussed in previous sections, emergency transfers of this type are authorized by statute. Military and government service are defined in the regulations. Depending upon the specific circumstances, either of these reasons might provide the basis for emergency transferring a permit for more than two consecutive years.

### Incarceration

When a commercial fisherman is convicted of a crime and incarcerated, the commission may consider an emergency transfer to prevent economic hardship to the permit holder's immediate family. Transfers are approved only with the stipulation that all monetary proceeds resulting from the transfer go directly to the needs of the family, and only if the family was supported by fishing income prior to the incarceration. Many transfers in this class involve temporarily passing an entry permit to an adult member of the family - someone who can fish the permit and use the proceeds to help support dependent family members. Other common examples include using the fishing proceeds to help make child support payments, or to prevent a family permit from falling into foreclosure, or to satisfy a household tax debt. In other cases, the commission may consider granting an emergency transfer to an incarcerated person who has not yet been convicted of a crime.

### Financial or Economic Hardship

The Economic Hardship category refers to relatively rare cases where an entry permit has been pledged as collateral for a loan through the Department of Commerce, Community & Economic Development (DCCED) or Commercial Fishing & Agriculture Bank (CFAB). DCCED and CFAB are the only lending agencies allowed to use entry permits as collateral. If an individual has offered a permit as collateral and falls behind on their loan payments, the lender can initiate foreclosure on the permit. Under these circumstances the commission will consider granting an emergency transfer of the permit, provided that all the monetary proceeds from the transfer are used to help prevent foreclosure on the loan. Before issuing an emergency transfer in this fashion, the commission requires complete documentation of the foreclosure and how the loan payments will be made.

### School or Training

Mandatory school or training might force a permit holder to temporarily leave a fishery. This situation most commonly applies to minor children who hold permits in family set gillnet operations. The category does not apply to elective educational pursuits like college or vocational training for high school graduates.

### Other

This category is selected by applicants when the reason for their transfer does not have an apparent fit into any of the other listed categories. The most common instance in the 'Other' category is when an emergency transfer is used to facilitate the permanent transfer of a permit (ET-PT). ET-PTs are discussed in greater detail in the previous section. The 'Other' category also includes cases where an individual obtains a permit through a right of survivorship, but they are not prepared to immediately fish the permit or to sell it. Another common scenario that fits this category is when a legal guardian seeks to dispense a permit on behalf of a permit holder who has become incapacitated.

### Working at Alternate Employment and Retirement

Although 'Retirement' was listed on past emergency transfer forms and 'Working at Alternate Employment' is still on the forms, neither of these reasons, standing alone, would result in an

emergency transfer. In fact, 'Retirement' is explicitly mentioned in CFEC regulations as a reason that does not justify an emergency transfer.<sup>22</sup>

Instead, these two reasons were placed on the form to add clarification for the ultimate dispensation of a permit after it is emergency transferred for a valid reason. Either of the selections must be combined with other permissible reasons, such as a temporary medical condition. In Table 9, only the category 'Working at Alternate Employment' is listed; it was marked by applicants in very rare instances (41 out of 25,542 emergency transfers). Although 'Retirement' was also listed as a selection on the emergency transfer forms for a period of time, it was never actually used - a tally indicates zeros for all years for that particular selection, therefore it is omitted from Table 9.

### **Terms for Use of the Permit**

Table 10 provides statistics on another section of the emergency transfer form, where permit holders select one of seven choices that help document the terms under which the transfer will take place. Generally, leasing the fishing rights associated with a state limited entry permit is prohibited; however, regulations grant an exception for permits that are emergency transferred.<sup>23</sup> The law allows permit holders to receive some form of remuneration if they are forced to temporarily forgo fishing. Regulations protect the permanent permit holder by automatically transferring the permit back into the permanent permit holder's name at the end of the year or at the end of the fishing season.

The data indicates the most common form of compensation to the permanent permit holder is a percentage of the earnings garnered by the person who temporarily fishes the permit. Flat fees to the permit holder are also common, and the proportion of this type of transaction appears to be increasing. In roughly 1 out of 4 emergency transfers, the permanent holder indicates they do not receive direct monetary compensation from the transfer. It is likely that many of the transactions in that category are tied to emergency transfers among family members.

"No answer given", as indicated in Table 10, is merely a literal accounting of the check-boxes on the emergency transfer survey form. In practice, all permit holders must relate the terms of compensation for the transfer. On occasion, the boxes on the form are inadvertently left unchecked (this was especially prevalent for five years in the 1990's), however, no transfers are processed without this information, and the terms of the transfer are detailed in ancillary documents in the CFEC files.

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<sup>22</sup> 20 AAC 05.1740 (i)(2)(C).

<sup>23</sup> 20 AAC.05.1705.

Reasons for Emergency Transfers and Terms of Transfer

**Table 9. Emergency Transfer Survey: Reasons Given for Transfers, 1994-2025**

Reason for ET for Permit	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	Total
<b>Accident or Injury</b>	111	118	88	104	80	87	119	107	90	96	87	109	121	93	121	131	137	137	130	151	132	121	161	158	219	270	161	176	168	159	183	154	4,279
	22.2%	13.1%	10.2%	11.4%	8.9%	9.9%	13.5%	13.3%	13.1%	13.8%	12.0%	13.7%	15.8%	12.6%	15.9%	15.7%	15.4%	15.4%	15.5%	19.1%	17.7%	16.4%	20.9%	18.7%	25.1%	28.8%	17.6%	20.5%	21.9%	22.0%	26.3%	24.4%	16.8%
<b>Illness or Other Health Problem</b>	263	463	482	511	502	492	442	404	318	342	339	372	349	356	341	389	430	424	412	338	322	362	319	359	328	356	354	333	326	288	250	256	11,822
	52.6%	51.4%	55.7%	55.9%	55.9%	56.0%	50.3%	50.2%	46.4%	49.0%	46.9%	46.9%	45.5%	48.3%	44.8%	46.7%	48.5%	47.7%	49.1%	42.7%	43.2%	48.9%	41.4%	42.4%	37.6%	38.0%	38.8%	38.9%	42.6%	39.9%	35.9%	40.6%	46.3%
<b>Death of Permit Holder or Immediate Family Member</b>	58	134	111	124	119	107	130	91	81	74	78	87	62	72	80	70	90	80	85	74	68	71	48	53	65	68	66	70	69	63	69	60	2,577
	11.6%	14.9%	12.8%	13.6%	13.3%	12.2%	14.8%	11.3%	11.8%	10.6%	10.8%	11.0%	8.1%	9.8%	10.5%	8.4%	10.1%	9.0%	10.1%	9.4%	9.1%	9.6%	6.2%	6.3%	7.5%	7.2%	7.2%	8.2%	9.0%	8.7%	9.9%	9.5%	10.1%
<b>Incarceration</b>	17	36	28	28	25	26	21	10	9	11	8	11	17	16	13	23	14	20	11	20	15	12	14	8	3	5	4	6	2	4	3	0	440
	3.4%	4.0%	3.2%	3.1%	2.8%	3.0%	2.4%	1.2%	1.3%	1.6%	1.1%	1.4%	2.2%	2.2%	1.7%	2.8%	1.6%	2.3%	1.3%	2.5%	2.0%	1.6%	1.8%	0.9%	0.3%	0.5%	0.4%	0.7%	0.3%	0.6%	0.4%	0.0%	1.7%
<b>Pregnancy</b>	22	55	46	38	48	32	33	33	20	14	27	20	25	28	32	27	24	29	32	31	30	25	26	31	14	16	23	33	16	14	24	34	902
	4.4%	6.1%	5.3%	4.2%	5.3%	3.6%	3.8%	4.1%	2.9%	2.0%	3.7%	2.5%	3.3%	3.8%	4.2%	3.2%	2.7%	3.3%	3.8%	3.9%	4.0%	3.4%	3.4%	3.7%	1.6%	1.7%	2.5%	3.9%	2.1%	1.9%	3.4%	5.4%	3.5%
<b>Government/Military Service</b>	0	2	5	4	5	5	1	1	3	5	8	8	17	10	5	7	4	7	10	13	9	9	6	6	3	4	13	7	11	8	8	4	208
	0.0%	0.2%	0.6%	0.4%	0.6%	0.6%	0.1%	0.1%	0.4%	0.7%	1.1%	1.0%	2.2%	1.4%	0.7%	0.8%	0.5%	0.8%	1.2%	1.6%	1.2%	1.2%	0.8%	0.7%	0.3%	0.4%	1.4%	0.8%	1.4%	1.1%	1.1%	0.6%	0.8%
<b>Financial/Economic Hardship</b>	10	31	28	24	25	28	27	25	14	12	13	7	10	8	7	9	9	4	4	11	4	2	14	4	6	3	8	14	1	3	4	4	373
	2.0%	3.4%	3.2%	2.6%	2.8%	3.2%	3.1%	3.1%	2.0%	1.7%	1.8%	0.9%	1.3%	1.1%	0.9%	1.1%	1.0%	0.5%	0.5%	1.4%	0.5%	0.3%	1.8%	0.5%	0.7%	0.3%	0.9%	1.6%	0.1%	0.4%	0.6%	0.6%	1.5%
<b>Working at Other Employment</b>	1	0	0	3	3	5	1	0	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	41
	0.2%	0.0%	0.0%	0.3%	0.3%	0.6%	0.1%	0.0%	0.3%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	
<b>School/Training</b>	1	7	6	5	9	9	11	13	10	10	12	16	13	10	10	8	9	11	12	9	14	13	6	8	6	6	1	5	0	6	5	6	267
	0.2%	0.8%	0.7%	0.5%	1.0%	1.0%	1.3%	1.6%	1.5%	1.4%	1.7%	2.0%	1.7%	1.4%	1.3%	1.0%	1.0%	1.2%	1.4%	1.1%	1.9%	1.8%	0.8%	0.9%	0.7%	0.6%	0.1%	0.6%	0.0%	0.8%	0.7%	1.0%	1.0%
<b>Other</b>	17	55	71	73	82	88	94	121	139	132	151	163	153	144	152	169	170	176	143	144	148	125	165	204	220	196	272	197	164	143	128	104	4,503
	3.4%	6.1%	8.2%	8.0%	9.1%	10.0%	10.7%	15.0%	20.3%	18.9%	20.9%	20.6%	19.9%	19.5%	20.0%	20.3%	19.2%	19.8%	17.0%	18.2%	19.9%	16.9%	21.4%	24.1%	25.2%	20.9%	29.8%	23.0%	21.4%	19.8%	18.4%	16.5%	17.6%
<b>Total Emergency Transfers</b>	500	901	865	914	898	879	879	805	686	698	723	793	767	737	761	833	887	888	839	791	745	740	771	847	872	938	913	857	766	722	696	631	25,542

Note: Figures in this table summarize data collected from the survey portion of the CFEC emergency transfer form. The survey was first implemented in 1994. During the transition, 431 emergency transfers were processed without surveys, which accounts for the differences in the totals between this table and other tables in this report that summarize all emergency transfers.

Reasons for Emergency Transfers and Terms of Transfer

**Table 10. Emergency Transfer Survey: Terms of Remuneration to the Transferor, by Year, 1994-2025**

Terms of Transfer	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	Total
<b>Combination of Fee and Percent</b>	19	36	44	37	59	58	42	23	11	11	11	15	19	19	15	14	16	22	20	17	15	7	16	14	13	17	13	6	5	4	8	4	630
	3.8%	4.0%	5.1%	4.0%	6.6%	6.6%	4.8%	2.9%	1.6%	1.6%	1.5%	1.9%	2.5%	2.6%	2.0%	1.7%	1.8%	2.5%	2.4%	2.1%	2.0%	0.9%	2.1%	1.7%	1.5%	1.8%	1.4%	0.7%	0.7%	0.6%	1.1%	0.6%	2.5%
<b>Flat Fee</b>	40	103	109	109	71	68	99	86	70	72	91	116	111	150	168	227	256	236	224	258	235	253	257	283	320	366	362	361	334	348	301	311	6,395
	8.0%	11.4%	12.6%	11.9%	7.9%	7.7%	11.3%	10.7%	10.2%	10.3%	12.6%	14.6%	14.5%	20.4%	22.1%	27.3%	28.9%	26.6%	26.7%	32.6%	31.5%	34.2%	33.3%	33.4%	36.7%	39.0%	39.6%	42.1%	43.6%	48.2%	43.2%	49.3%	25.0%
<b>No Payment to Permit Holder</b>	86	194	139	164	187	195	180	206	219	199	213	174	203	172	202	232	254	256	247	261	253	230	213	297	222	197	183	166	162	114	139	125	6,284
	17.2%	21.5%	16.1%	17.9%	20.8%	22.2%	20.5%	25.6%	31.9%	28.5%	29.5%	21.9%	26.5%	23.3%	26.5%	27.9%	28.6%	28.8%	29.4%	33.0%	34.0%	31.1%	27.6%	35.1%	25.5%	21.0%	20.0%	19.4%	21.1%	15.8%	20.0%	19.8%	24.6%
<b>Other</b>	126	53	54	59	60	50	93	82	68	88	110	145	126	122	89	75	102	113	105	63	44	62	71	34	92	114	122	111	74	82	61	44	2,694
	25.2%	5.9%	6.2%	6.5%	6.7%	5.7%	10.6%	10.2%	9.9%	12.6%	15.2%	18.3%	16.4%	16.6%	11.7%	9.0%	11.5%	12.7%	12.5%	8.0%	5.9%	8.4%	9.2%	4.0%	10.6%	12.2%	13.4%	13.0%	9.7%	11.4%	8.8%	7.0%	10.5%
<b>Percentage of Gross Earnings</b>	224	378	302	399	379	372	428	388	312	317	284	310	285	252	247	268	232	239	234	189	193	185	202	201	204	210	218	192	177	144	104	107	8,176
	44.8%	42.0%	34.9%	43.7%	42.2%	42.3%	48.7%	48.2%	45.5%	45.4%	39.3%	39.1%	37.2%	34.2%	32.5%	32.2%	26.2%	26.9%	27.9%	23.9%	25.9%	25.0%	26.2%	23.7%	23.4%	22.4%	23.9%	22.4%	23.1%	19.9%	14.9%	17.0%	32.0%
<b>Trade</b>	0	0	0	1	1	1	1	0	0	0	0	1	0	0	3	1	1	1	1	0	3	0	3	2	0	0	1	1	1	0	1	0	24
	0.0%	0.0%	0.0%	0.1%	0.1%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.4%	0.1%	0.1%	0.1%	0.1%	0.0%	0.4%	0.0%	0.4%	0.2%	0.0%	0.0%	0.1%	0.1%	0.1%	0.0%	0.1%	0.0%	0.1%
<b>No Answer Given</b>	5	137	217	145	141	135	36	20	6	11	14	32	23	22	37	16	26	21	8	3	2	3	9	16	21	34	14	20	13	30	82	40	1,339
	1.0%	15.2%	25.1%	15.9%	15.7%	15.4%	4.1%	2.5%	0.9%	1.6%	1.9%	4.0%	3.0%	3.0%	4.9%	1.9%	2.9%	2.4%	1.0%	0.4%	0.3%	0.4%	1.2%	1.9%	2.4%	3.6%	1.5%	2.3%	1.7%	4.2%	11.8%	6.3%	5.2%
<b>Total Emergency Transfers</b>	500	901	865	914	898	879	879	805	686	698	723	793	767	737	761	833	887	888	839	791	745	740	771	847	872	938	913	857	766	722	696	631	25,542

Note: Figures in this table summarize data collected from the survey portion of the CFEC emergency transfer form. The survey was first implemented in 1994. During the transition, 431 emergency transfers were processed without surveys, which accounts for the differences in the totals between this table and other tables in this report that summarize all emergency transfer