



January 15, 2016

Dr. Jacob Kritzer, Chair
New England Fishery Management Council
Scientific and Statistical Committee
50 Water Street, Mill 2
Newburyport, MA 01950

Dear Dr. Kritzer,

We are writing to offer the Scientific and Statistical Committee (SSC) a groundfish fishery perspective on the availability and utilization of witch flounder based upon our experience with Northeast Seafood Coalition (NSC) fishing members that operate out of the Northeast Fishery Sectors.

NSC members enrolled in the Northeast Fishery Sectors include fishing vessels that fish inshore as well as vessels that have a broader range which operate offshore and in multiple broad stock areas (BSAs). In terms of the witch flounder fishery, NSC members participate in the two key components that comprise of this fishery, the inshore Gulf of Maine and offshore Gulf of Maine / Georges Bank.

For NSC members and non-members, CPUE has remained high in all areas where witch flounder is an expected component of catch. Put another way, from a historical perspective the witch flounder fishery footprint within the overall stock area has not constricted and CPUE at the fringes remains dangerously high relative to the recent commercial ACLs and resulting individual and fleet allocations.

For the offshore fleet this is especially problematic because the fleet is already avoiding the areas within the footprint that are producing highest CPUEs of witch flounder because the 2013-2015 ACLs have presented a witch flounder avoidance scenario for the mobile gear fleet in recent years. For the inshore fleet, witch flounder continues to be readily available and comprises an ever increasing proportion of total catch due to dramatically reduced catch reductions of other inshore stocks.

For most of the fishery, witch flounder shares a fishery footprint that is similar to other important groundfish stocks as well as monkfish. Notably, american plaice, white hake, pollock and monkfish share huge overlaps of their respective fishery footprints to the extent that the catch of any of these species can be directly constrained by the ACL of one of the others. The extent to which the fishery is constrained is largely a function of the ability of the assessment to come close to correctly estimating the true state of nature for a particular stock among the mix of stocks that co-exist.

NSC has consistently stated that large ABC reductions that result from a truly smaller stock should not present an insurmountable fishery constraint. This is because the overall CPUE within the historical fishery footprint should decline proportionally to the reported stock status and fishermen should find it relatively easy to avoid any known concentrations.

Unfortunately, for many stocks in the groundfish complex this is not the case. Witch flounder is a prime example of a stock that suffers from a pessimistic assessment concurrent to completely contradictory signals in the fishery throughout the full footprint areas both inshore and offshore.

At the Groundfish Committee Meeting on Thursday January 14, 2016, catch projection results provided by the Plan Development Team shown to the Committee revealed an ABC of 521 metric tons in FY 2016 has a corresponding biomass of 3,234 metric tons. A constant quota approach using an ABC of 521 metric tons in FY 2017 would result in a corresponding biomass of 4,210 metric tons.

Alternatively, an ABC of 399 metric tons in FY 2016 has a corresponding biomass of 3,253 metric tons and a constant quota utilizing an ABC of 399 metric tons in FY 2017 results in a corresponding biomass of 4,342 metric tons.

NSC views the difference in these corresponding biomass values as insignificant and, thus, fully supports the Council's willingness to accept an ABC for witch flounder that is up to 521 metric tons.

To conclude, in this instance, there are far greater risks to the groundfish fishery than to the resource. With no correlating negative signals being generated by the commercial fishery the 2015 updated assessment included a substantial downward retrospective adjustment (approximately 50%). For this reason and recognizing there will be a benchmark assessment in 2016, NSC fully encourages the reconsideration of an ABC up to the OFL.

Sincerely,



Jackie Odell
Executive Director



Vito Giacalone
Policy Advisor, Board of Directors

Table 1: Range of lease prices from fishing years 2010-2015 for two sample Northeast Fishery Sectors and Average Ex-Vessel Price for that corresponding fishing year

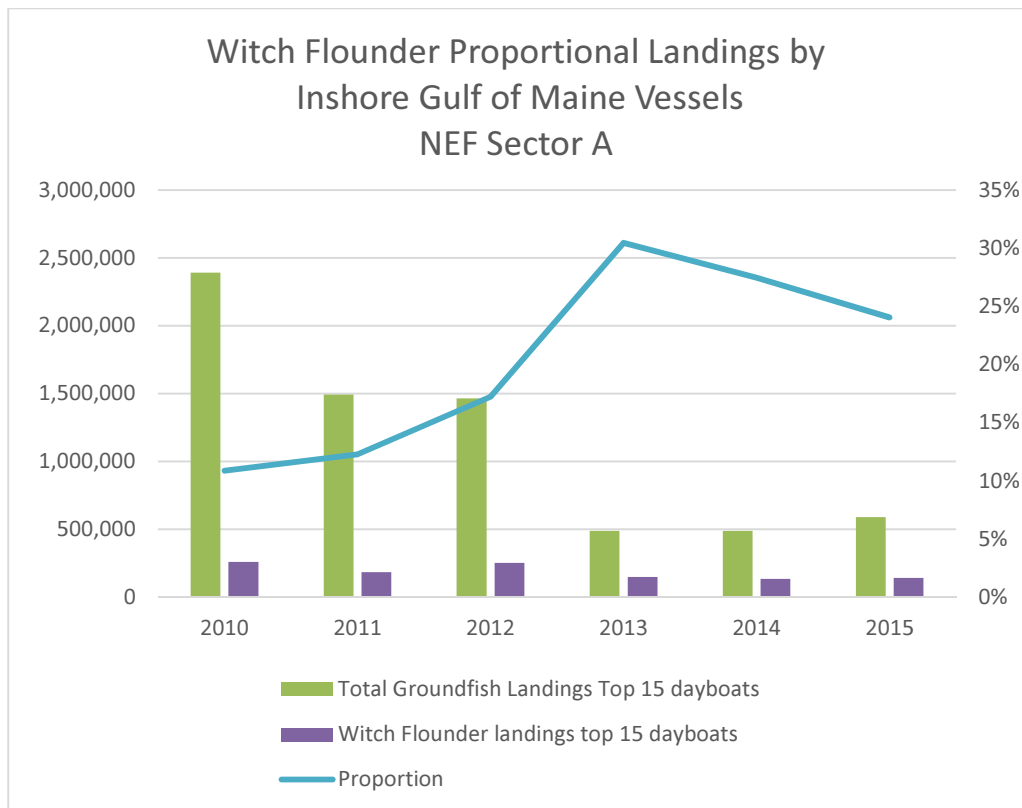
FY	Lease Price Range NEF Sector A	Lease Price Range NEF Sector B	Average Ex-Vessel Price
2010	(not available)	\$1 - \$1.60	\$2.34
2011	\$.45 - \$.85	\$.65 - \$.925	\$1.96
2012	\$.50 - \$.65	\$.50 - \$.625	\$2.03
2013	\$.90 - \$1.20	\$1.18 - \$1.30	\$2.20
2014	\$.85 - \$2.50	\$1.50 - \$1.65	\$2.60
2015*	\$1.20 - \$1.35	\$1.35 - \$1.43	\$2.42

* 2015 Partial year data May 1, 2015 through December 31, 2015
 Lease prices reflect those where witch flounder has been specified not those wrapped

Note 1: into package deals

Note 2: Ex-Vessel price incorporates price for large, medium and small gray sole

Chart 1: Witch Flounder Proportional Landings by Inshore (dayboat) Gulf of Maine Vessels



- In 2010, the inshore Gulf of Maine top 15 ranked vessels that landed witch flounder (from NEF Sector A) landed a total of approximately 2.4 million lbs of groundfish of which 260,000 lbs was witch flounder. This represents an 11% proportion of witch flounder to their total groundfish landings.
- By 2015, to date, these top 15 ranked vessels landed a total of 590,000 lbs of groundfish of which 142,000 lbs. is witch flounder representing 24% of their total landings.
- The total groundfish landings of these 15 top ranked inshore Gulf of Maine vessels is down 66% from FY 2010 through 2015 to date.

Additional Information:

Additional information not shown in Chart 1 above.

In 2010, the offshore top 12 ranked vessels that landed witch flounder (from NEF Sector A) landed a total of approximately 15.7 million lbs of which 264,000 lbs was witch flounder. This represents a 2% proportion of witch flounder to total groundfish landings.

By 2015, to date, the offshore top ranked 9 vessels have landed under 6 million lbs of groundfish of which 38,000 lbs is witch flounder which represents 1% of total landings.

Note: the 2013 fishing year was an off year for all fishing (the entire Georges Bank and Gulf of Maine systems were off)

Table 1: Range of lease prices from fishing years 2010-2015 for two sample Northeast Fishery Sectors and Average Ex-Vessel Price for that corresponding fishing year

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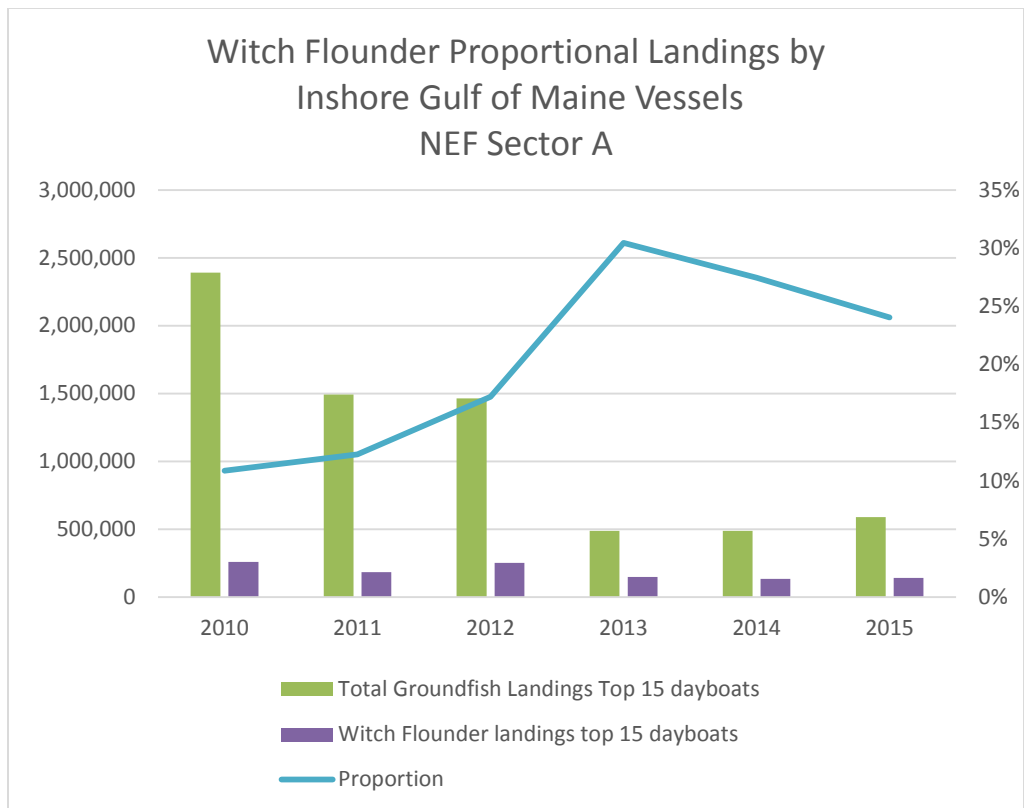
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- The total groundfish landings of these 15 top ranked inshore Gulf of Maine vessels is down 66% from FY 2010 through 2015 to date.
- *The above chart includes groundfish landings data from the dealer database for fishing years 2010-2015 (as of December 30, 2016), excluding whiting, for vessels participating in the NEF Sectors.*

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