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## ASSOCIATED FISHERIES OF MAINE

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PO Box 287, South Berwick, ME 03908

August 15, 2017

Ms. Kelly Denit  
National Marine Fisheries Service  
Office of Sustainable Fisheries  
1315 East West Highway  
Silver Spring, MD 20910

Dear Ms. Denit:

### Streamlining Regulatory Processes and Reducing Regulatory Burden

The Associated Fisheries of Maine (AFM) is a trade association of fishing businesses heavily vested in the New England (NE) groundfish fishery.

For over 20 years, AFM has collaborated with the New England Fishery Management Council (NEFMC) and the National Marine Fisheries Service (NMFS) to develop policy and regulations for the NE groundfish fishery.

For decades, the NE groundfish fishery was managed by a system of input controls – days at sea restrictions, large mesh size, and closed areas.

In 2010, the NE groundfish fishery “transitioned” to an output based system of annual catch limits and accountability measures. Inexplicably, the input controls that should have been removed with this transition, have not been, and they prevent full realization of significant revenue to the fishery.

On August 1, in testimony before the Senate Subcommittee on Oceans, Atmosphere, Fisheries and Coast Guard, AA Oliver said: *“For example, while our West Coast groundfish fisheries have rebuilt several important stocks, in recent years fishermen are leaving a substantial amount of the available harvest of some groundfish species in the water, due to regulatory or bycatch species constraints. **We must find ways to maximize allowable harvests that are still protective of non-target species in all of our fisheries.**”* (emphasis added)

The same is true for the NE groundfish fishery. We are leaving millions of dollars and millions of pounds of healthy fish stocks like haddock, pollock and redfish in the water. AFM offers the following suggestions for reducing regulatory burden and increasing allowable harvest and revenue to the fishery:

- 1) **Remove mortality closed areas.** The NE groundfish fishery management plan includes year-round closures, spanning a 20+ year timeframe, of over 12,000 square nautical miles (an area larger than the state of Maryland) of historically productive fishing grounds. Under a system with annual catch limits and accountability measures these

closed areas are redundant, and their effectiveness has not been documented. These closed areas inhibit the ability to maximize the allowable harvest of healthy fish stocks.

- 2) Reduce minimum mesh size for fishing gear targeting Georges Bank haddock** US fishermen compete directly with Canadian fishermen for both harvest and market of Georges Bank haddock. Canadian fishermen achieve over 90% utilization of their allowable harvest of haddock, while US fishermen achieve far less, leaving over 100 million pounds of haddock unharvested in 2016. Canadian fishermen use the mesh size appropriate for haddock harvest while US fishermen are restricted to inefficient mesh

The foregone haddock harvest has an ex vessel value of between \$50 and \$100 million. This additional revenue would alleviate the disaster declaration for this fishery.

- 3) Eliminate minimum fish size for Georges Bank haddock**  
Again, US fishermen compete with Canadian fishermen for this resource. US fishermen are required to discard fish below a minimum size, despite achieving only a small fraction of available annual catch limit. Canadian fishermen do not have a minimum size restriction. Allowing efficient mesh and eliminating the minimum fish size would place US fishermen on an equal par with Canadian fishermen fishing on the same resource.
- 4) Eliminate Length/horsepower restrictions for quota managed species**  
Restrictions on length and horsepower upgrades are not relevant to output based managed fisheries (like NE groundfish), and restrict fishermen's ability to upgrade to safer, more efficient vessels.

We appreciate the opportunity to identify existing regulations that inhibit job creation, are outdated and unnecessary.

Sincerely,

*M. Raymond*

Maggie Raymond  
Executive Director