



August 9, 2018

Dr. John Quinn, Chairman
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, MA 01950

Dear Dr. Quinn,

We are writing in regards to the upcoming Scientific and Statistical Committee (SSC) discussion for an Acceptable Biological Catch (ABC) for Georges Bank (GB) yellowtail flounder for fishing years 2018-2019. We encourage the SSC to consider three items listed below before finalizing a recommendation.

First, we recognize that there continues to be low utilization of the GB yellowtail flounder stock by the commercial groundfish fleet. As we have noted in prior communication to the SSC, the active vessels participating in the groundfish fishery across the board is at a historical low and there are very few active vessels knowledgeable in the GB yellowtail fishery today.

In recent years, groundfish vessels fishing on Georges Bank are predominantly fishing in deep water using haddock separator trawls or selecting to stay away from the GB yellowtail fishing grounds - further onto the bank to harvest Georges Bank winter flounder. Also, in the 2017 fishing year, the Operations Plan for NEFS IX was revoked by the Agency which likely reduced the landings of GB yellowtail flounder.

As we have noted in past correspondence, the steep decline of the ACL for GB yellowtail flounder over the past ten years has resulted in a loss of a reliable market price. For stocks like GB yellowtail, there is a threshold where utility rates would increase once the ACL was increased to or above a level that would make it financially feasible to try to rebuild the market for yellowtail. This would likely happen once a regular supply reoccurred. All these factors translate to fishery and market conditions that are not reflective of the availability or abundance of GB yellowtail.

Second, we have serious concerns with the week sampling and limited data that now serves as the basis for the stock abundance estimate for GB yellowtail. Aside from the fact that both the United States and Canadian primary survey vessels were broken down and replacement vessels were most recently utilized, *the random survey design approach largely placed the survey vessels in areas outside of what would be referred to as the GB yellowtail flounder stock area footprint.*

Low sampling combined with minimal catch information received by the groundfish fishery now serves as the basis for the assessment and ABC recommendations moving forward for 2018-2019. This is serious issue. Calculations applied by the Empirical Approach based on these parameters result in extensive reductions that we feel do not adequately represent accurate biomass estimates nor does this approach consider the serious economic constraints on other groundfish and non-groundfish fisheries operating on Georges Bank.

Third, we are alarmed that focused discussions with the groundfish fishery, the few remaining that are knowledgeable about the GB yellowtail fishery, has not occurred. It's troublesome that the poor survey performance and survey strata locations has not been reviewed nor discussed with the fishing industry in a focused and open manner.

To conclude, we urge the SSC to carefully weigh the data available before making any such profound and economically disastrous decision which would be the result of an ABC much lower than the present 300 mt. Furthermore, any recommendations the SSC could make for the NEFSC and Council to prioritize targeted research to improve the biological knowledge and stock assessment process for GB yellowtail would be greatly appreciated.

Sincerely,

Jackie Odell
Executive Director

Vito Giacalone
Policy Advisor, Board of Directors