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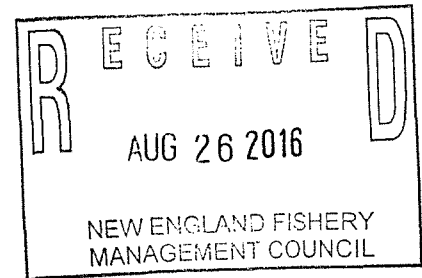
# CORRESPONDENCE

# American Bluefin Tuna Association

P.O. Box 447, Salem, NH 03079  
(603)898-8862 Cell (603)490-4715

26 August 2016

Mr. Tom Nies, Executive Director  
New England Fishery Management Council  
50 Water Street  
Newburyport MA 01950



Re: Atlantic Herring Fishery

Dear Tom,

The American Bluefin Tuna Association represents commercial handgear fishermen who target Atlantic bluefin tuna. Our landings in 2015 represented 88% of all commercial landings of Atlantic bluefin in the U.S. The majority of these landings come from the Gulf of Maine region. Therefore, we have a very significant vested interest in ensuring that there is adequate forage in the Gulf of Maine for bluefin. Atlantic herring represents upwards of 50% of the bluefin's diet in this region.

We are writing to you today because we understand that thus far in fishing year 2016, with the exception of Sector 1A, other sectors in the Atlantic herring fishery in the Gulf of Maine region have been underperforming. To address this problem, we understand that the NEFMC is considering the re-allocation of ACL from underperforming sectors to Sector 1A. This is important to us because Sector 1A is an "inshore" sector that is extremely important to our fishermen.

We understand that the NEFMC is investigating the question of whether/not the Council has the authority to make in-season transfers of quota between fishing sectors under the present circumstances.

We would like to make the following points:

1. Sector management is an ecosystem-based fishery management tool intended to distribute fishing effort equitably within a region. Clearly, due to lack of abundance of herring in the 2016 fishing season, there is a problem with this resource in most of the sectors in which it is normally harvested. The NEFMC does not presently have a biological explanation for this phenomenon. Under these circumstances it makes no sense to allow fishing effort to shift to the sole sector in which a greater abundance is found. This would significantly undermine the sector management system by placing Sector 1A under excessive harvesting pressure. Further, to our knowledge

no analysis has been undertaken to determine the extent of negative biological consequences of such an action.

2. If such an action is taken, we anticipate that there will be immediate and strong negative consequences for our bluefin fishery which, as mentioned, is entirely dependent upon the abundance of herring as forage, particularly in inshore areas such as Sector 1A. This will predictably and significantly affect our landings, have an immediate negative economic coastal business effects and there may be other, longer term negative consequences, as well.

To wit: Atlantic bluefin is a species that is controlled by the International Commission for the Conservation of Atlantic Tunas (ICCAT). Whenever a contracting party to the ICCAT Convention is not able to utilize its allocated annual quota there is a very real risk that other countries – countries that do not manage their fisheries as sustainably as ourselves – may attempt to acquire our underutilized quota. This event would permanently reduce the U.S. participation in the West Atlantic bluefin tuna fishery.

3. Another possible negative outcome of the action being contemplated by the Council: If the Northeast bluefin fishery is not able to effectively utilize its quota, the North Carolina winter fishery will attempt to increase their sub-allocation of the U.S.'s bluefin quota by decreasing the allocation for the Northeast. This would have a permanent negative effect on our New England fishery. Decreased Bluefin revenues to Northeast fishermen create further pressure for increased groundfishing opportunities.

In summary, ABTA takes the view that re-allocation of ACL from underperforming sectors to Sector 1A of the herring fishery will have significant short and long term negative effects on our fishery. Clearly, this season there is a serious problem with the resource and, in our view, the Council's priority should be to first obtain a scientific explanation for the present circumstances before contemplating any action.

We thank you for the opportunity to provide our input regarding the subject issue.

Cordially,

Ralph Pratt, President  
American Bluefin Tuna Association