

Groundfish Amendment 18

Part 2 of 2 – Public comments

PRELIMINARY SUMMARY

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New England
Fishery Management Council

Outline

- Participation/demographics
- Comment content
 - Alternatives
 - Council process



Amendment 18

Public Comment Period

- **July 7 – August 31, 2015**
- **13 oral comments**
- **18 written comments**



Oral comments

Location	Attendees*	Speakers
Portland, ME	8	5
Portsmouth, NH	2	0
New Bedford, MA	7	5
Mystic, CT	0	0
Gloucester, MA	6	3
webinar	1	0
Total	24**	13

*Not including Council members or staff.

**22 total attendees if duplicates removed.



Oral comments

Stakeholder Type

Commercial groundfish fisherman = 6 (46%)

Handgear = 1 (8%)

Other = 5 (38%)

Non-governmental organization = 6 (45%)

Environmental = 2 (15%)

Commercial = 2 (15%)

Other = 2 (15%)

Interested public = 1 (8%)

Home state

ME = 5 (38%)

MA = 5 (62%)



Written comments

Letter types (n=18)

Individual = 6

Group = 1 (40 signatures)

NGO = 9

Agency = 2

Stakeholder type of letters (n=16)

Commercial groundfish fisherman = 5
(no handgear)

Non-governmental organization = 8

Environmental = 2

Commercial = 3

Other = 3

Interested public = 1

Recreational = 2

Home state*

ME = 6

NH = 2

MA = 4

RI = 1

VA = 1

Unknown = 1

* Not including letter
from 40 fisherman of
multiple states



NGOs represented (oral and written)

- Commercial fishery
 - Associated Fisheries of Maine
 - Massachusetts Fishermen's Partnership
 - New Bedford Seafood Consulting
 - Northeast Coastal Communities Sector
 - Northeast Hook Fisherman's Association
 - Northeast Seafood Coalition
- Environmental
 - Environmental Defense Fund
 - The Nature Conservancy
- Other
 - Health Care Without Harm
 - Northwest Atlantic Marine Alliance
 - Penobscot East Resource Center



Content – accumulation limits

- General comments re having caps
 - Support – keep as many people fishing as possible
 - Opposition – sufficient protections in place; caps prevent achieving OY.
- The preferred alternatives (15.5% average PSC, 5% permit)
 - Support – least disruptive; doesn't penalize PSC acquired through AI6.
 - Opposition – can accumulate too much of a stock, caps need to be stock-specific; community impacts of consolidation should be considered and prevented; don't just focus on preventing market power.



Content – HA measures

- Support for Council preferences (Alt. 2 throughout)
 - Promotes fleet diversity
 - Supports a future for handgear
 - Increases flexibility for handgear fishermen
- Opposition to Council preferences
 - Cited NOAA's repeated comments on the inability to accurately monitor such small sub-ACLs.



Content – data confidentiality

- Support for Council preferences (No Action. ACE lease price remains confidential)
 - The data are not necessary for the administration of the sector program.
- Opposition to Council preferences
 - The data would improve fishermen's ability to participate in the lease market; increase ACE use that would benefit individuals and communities.



Content – inshore/offshore GOM

- Support for Council preferences (No action. No line or associated measures.)
 - Council's objective unclear.
 - Other alternatives wouldn't help the inshore fishermen.
- Opposition to Council preferences
 - A line would improve data collection to aid development of future actions.
 - Disappointment that the alternatives miss the mark, not protecting inshore fish or fishermen.



Content – Redfish Exemption Area

- Support for Council preferences (Establish in FMP)
 - The gear, rules, and area are well studied and laudable.
- Opposition to Council preferences
 - Sector exemptions should remain within the current approval process.



Themes – Council process

- The Council is failing
 - A18 has taken too long, wasting precious time/resources.
 - A18 has not adequately addressed the concerns that prompted it.
 - Very difficult for newcomers to understand/engage in the Council process.
 - Stakeholder views not taken seriously.
 - Groundfish management is failing to sustain communities.

