

CORRESPONDENCE

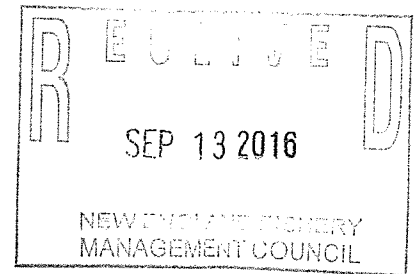
ASSOCIATED FISHERIES OF MAINE

PO BOX 287, SOUTH BERWICK, ME 03908

September 13, 2016

Mr. Terry Stockwell, Chair
New England Fishery Management Council

VIA ELECTRONIC MAIL



Dear Terry:

RE: Monkfish

The Associated Fisheries of Maine (AFM) supports the recommendation by the Scientific and Statistical Committee to retain the status quo overfishing level (OFL) and acceptable biological catch (ABC) for both monkfish stocks.

The AFM also supports the monkfish committee recommendation to reduce the management uncertainty buffer in both monkfish management areas. The current management uncertainty buffers are 13.5% in the Northern Fishery Management Area (NFMA) and 6% in the Southern Fishery Management Area (SFMA).

The monkfish fishery management plan (FMP) does not provide explanation on how the management uncertainty percentages were derived.

The FMP is extremely conservative in setting the ABC, as well as the annual catch limit (ACL) and the annual catch target (ACT).

		OFL	ABC	MT reduction	% reduction	ACT	% reduction
NFMA		17805	7592	-10213	-42%	6567	-13.5%
SFMA		23204	12316	-10888	-53%	11613	-6%

The FMP defines the purpose of the ACT as follows: *A proactive AM would be an ACT that is set sufficiently below the ACL such that the measures that are based on the ACT prevent the ACL from being exceeded, in consideration of all sources of management uncertainty.*

Since the FMP was brought into compliance with requirements for ABCs and ACLs, landings in both management areas have been substantially below the Total Allowable Landing limit (TAL).

	NFMA				SFMA	
Fishing Year	TAL	Landings		Fishing Year	TAL	Landings
2011	5854	3699		2011	8925	5801
2012	5854	3920		2012	8925	5184
2013	5854	3596		2013	8925	5088
2014	5854	3404		2014	8925	5145
2015	5854	4105		2015	8925	4703

In short, the multiple levels of buffers and consequent reductions in fish available to the industry cannot be justified, and therefore we urge the New England Fishery Management Council to eliminate the ACT or reduce the uncertainty buffer.

As always, we appreciate your consideration of our views.

Sincerely,

M. Raymond

Maggie Raymond
Executive Director