

# Correspondence





New England Fishery Management Council

50 WATER STREET | NEWBURYPORT, MASSACHUSETTS 01950 | PHONE 978 465 0492 | FAX 978 465 3116  
E.F. "Terry" Stockwell III, *Chairman* | Thomas A. Nies, *Executive Director*

February 4, 2015

Christopher M. Moore, Ph.D.  
Executive Director  
Mid-Atlantic Fishery Management Council  
800 North State Street, Suite 201  
Dover, DE 19901

**RE: NE Council Motions re. Omnibus Industry-Funded Monitoring Amendment**

Dear Chris:

At its January 27-29, 2015 meeting, the New England Fishery Management Council approved the following five motions regarding the Draft Omnibus Industry-Funded Monitoring (IFM) Amendment:

**1. Motion Carried Unanimously 16-0-0**

*That the following option be included in Section 2.2.2, Herring Alternative 2, p. 48 of the Omnibus IFM Amendment:*

To require third-party at-sea monitoring on Category A/B herring vessels, designed to meet the following objective: to document all fish not retained on board the vessel for any reason, including detailed accounting of full and partial slippage events.

When the IFM amendment is implemented (Year 1), the third party at-sea monitor coverage level for Category A/B herring vessels under this option will be (sub-options) (a) 100%, (b) 75%, (c) 50% of all trips (on trips without a NEFOP observer) (sub-options with/without waivers) when the vessel is declared into the herring fishery.

This option includes portside sampling and electronic monitoring (EM), to be phased-in through the framework adjustment process. The third party at-sea monitor coverage target specified in this amendment will be adjusted as portside sampling/EM programs are implemented. Initially, the service provider standards under this option will be the same as those for the groundfish at-sea monitoring program, but these standards will be modified for portside sampling/EM in the implementing action.

**2. Motion Approved by Consensus (No Objection)**

To add Alternative 2.2.2.5 for 100% coverage on fishing in the current year-round groundfish closed areas (*staff to include specific areas*) to the IFM document

**3. Motion Approved by Consensus (No Objection)**

To add an alternative that would allow a wing vessel to be exempt from observer coverage. These vessels would be prohibited from carrying fish.

**4. Motion Carried Unanimously 16-0-0**

That the draft Omnibus IFM Amendment needs more development and additional analysis, and should be reviewed by the Observer Policy Committee and both Councils at a future meeting prior to going out for public comment.

**5. Motion Carried Unanimously 16-0-0**

*To have the Industry Funded Monitoring FMAT address the 6 bullets on pg. 3 of the January 22, 2015 Observer Policy Committee meeting summary in the IFM Amendment:*

- Expansion of the discussion of economic impacts – address/groundtruth fixed and operating costs for herring/mackerel vessels
- Expansion of the discussion of impacts on the Atlantic herring and mackerel fleets
- Information and analysis to support the implementation of a portside sampling program and/or EM program to be implemented through a framework adjustment (relative government costs/industry costs, comparison to at-sea costs)
- Costs differences between at-sea monitors versus observers
- Expansion of impacts of herring and mackerel options on other fisheries (groundfish stocks)
- Impacts of current observer coverage requirements for midwater trawl vessels in the groundfish closed areas

As you can see from the above motions, the New England Council believes that the Draft Omnibus IFM Amendment needs further development and more analysis before it moves forward for public comment and the selection of final measures by both Councils. Please consider the New England Council recommendations as the Mid-Atlantic Council develops its recommendations regarding the Draft Omnibus IFM Amendment at its February 2015 meeting.

Sincerely,



Thomas A. Nies  
Executive Director

cc: Council Members



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February 27, 2015

Mr. John Bullard  
Northeast Regional Administrator  
NMFS, Greater Atlantic Regional Fisheries Office  
55 Great Republic Drive  
Gloucester, MA 01930

**RE: Comments on Draft Environmental Assessment for the Omnibus Industry-Funded Monitoring (IFM) Amendment**

Dear John:

At its January 28-29, 2015 meeting, the New England Fishery Management Council reviewed the Draft Environmental Assessment (EA) for the omnibus Industry-Funded Monitoring (IFM) amendment and unanimously agreed that the document needs further development and additional analysis prior to approval by the New England Council for public comment. The Council also identified the following specific issues to address in the draft document:

- Expansion of the discussion of economic impacts – address/groundtruth fixed and operating costs for herring/mackerel vessels
- Expansion of the discussion of impacts on the Atlantic herring and mackerel fleets
- Information and analysis to support the implementation of a portside sampling program and/or EM program to be implemented through a framework adjustment (relative government costs/industry costs, comparison to at-sea costs)
- Costs differences between at-sea monitors versus observers
- Expansion of impacts of herring and mackerel options on other fisheries (groundfish stocks)
- Impacts of current observer coverage requirements for midwater trawl vessels in the groundfish closed areas

As the IFM FMAT works to address the issues identified above, my staff will continue to work with your staff regarding other revisions to the document that are necessary. Thank you for your attention to this matter. Please contact me with any further questions or concerns.

Sincerely,

Thomas A. Nies  
Executive Director

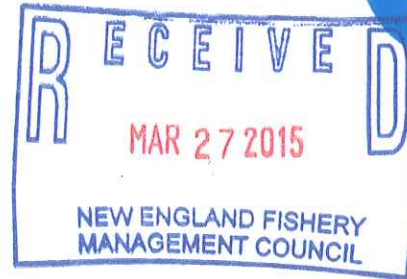
cc: Council members





# Seafreeze Ltd.

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Dear Council Members,

At Seafreeze, we are completely opposed to 100% observer coverage and electronic monitoring in the herring/mackerel fisheries, and have some very real economic concerns with what is being discussed in the IFM Amendment with regards to these fisheries. Seafreeze boats typically do not just fish for herring/mackerel on one trip. Typically our boats go fishing for 7-14 days (unlike a "herring" boat that fishes only/mostly for herring and is at sea for a much shorter amount of time, maybe 2-3 days). Usually we are declared into a squid fishery, but with the option to retain herring or mackerel in case we come across some on the way. We are concerned about the economic impact that herring/mackerel (if mackerel is incorporated) IFM may have on our squid trips. For this reason, we are very opposed to increased monitoring, whether by observer or EM. We cannot afford to pay for herring observers or EM coverage on squid trips, and it does not seem equitable that this would be the case. I am writing to raise these issues and inquire whether there will be any separate analysis of the estimated costs to boats who are fishing in multiple/mixed fisheries with the option to retain herring, as opposed to boats targeting primarily herring.

Also, I am writing to inquire if there will be a separate economic analysis for boats catching large amounts of herring as opposed to small amounts of herring. For example, many of the "herring" boats, which fish primarily for herring, can catch a million lbs a day. Seafreeze boats, because we are freezing onboard and therefore have limited capacity (i.e. we can only catch as much as we can freeze at a time), are limited to up to 100,000 lbs a day. We are actually more comparable, in capacity, to much smaller vessels. Much smaller vessels can actually out-catch us in a day. If a typical "herring" vessel can catch in one day what it takes ten days for us to catch (poundage wise), it would seem inequitable for us to have to pay the same amount per day or have the same amount of coverage. We do not have the same profit margins per day, and therefore cannot afford it. But neither do we have the same impact on the resource per day; our footprint is much smaller. This is a very real concern for us, as well as for a lot of the small boat fleet. It would be appropriate for a separate analysis or exemptions to be made for smaller production vessels.

We are requesting if some kind of separation/exemption can be made for these types of issues. There definitely needs to be some delineation between herring focused and mixed species

focused boats, and between higher production and lower production boats. To lump vessels with very different characteristics together isn't equitable or reasonable. Let me know if anything can be done along these lines, and let me know if there is any information that can help with possibly developing these as options.

Best,

Meghan

Meghan Lapp

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