

CORRESPONDENCE

ASSOCIATED FISHERIES OF MAINE

PO Box 287, South Berwick, ME 03908

March 17, 2020

Dr. Matthew McKenzie, Chair
Skate Committee
New England Fishery Management Council

VIA ELECTRONIC MAIL

Dear Dr. McKenzie:

The Associated Fisheries of Maine writes to encourage the Skate Committee to recommend that the Council abandon pursuit of limited access for the food (wing) skate fishery.

Limited access is inherently controversial, and typically we support limited access when there is a clear rationale. However, after several years of work on Amendment 5, the rationale for limited access, in our opinion, has not been established. The Council has been advised by NOAA General Counsel that rationale for limited access must be clear and objective.

There is no strong desire from the skate fishery participants for limited access. Your staff's review of the Amendment 5 scoping comments shows that "written comments suggested a slight preference for limited access; however, the spoken comments indicated more opposition."

In our February 8, 2017 written scoping comments, and in subsequent verbal comments to the Committee and to the Council, we have challenged the rationale for imposing new limited access criteria for those vessels that utilize the skate food (wing) fishery as a component of the groundfish fishery. Those vessels already possess a de facto limited access skate permit, by virtue of the skate plan requirement to utilize multispecies days at sea in order to possess skates. The majority of identifiable landings from both the food (wing) and bait fisheries is attributed to vessels in groundfish sectors – the fishery with the highest level of monitoring in the entire northeast. Moreover, active vessels in groundfish sectors have been reduced to less than 200 – hardly a threat to overcapacity or overfishing in the skate fishery. Landings in the skate fishery have never exceeded the ABC, and only once has the ACL been exceeded, albeit barely (in 2017 the ACL was exceeded in the food (wing) fishery by 1% or 93 mt). By any measure, the food (wing) skate fishery is effectively managed under current regulations.

The catch data for the skate fishery does show a surprising amount of catch from "undeclared" trips and/or trips where the possession limit was exceeded. This begs for a letter to permit holders from GARFO emphasizing the current skate fishery regulations.

Sincerely,

M. Raymond

Maggie Raymond, Executive Director
Associated Fisheries of Maine