

7a.

ADDITIONAL CORRESPONDENCE

ASSOCIATED FISHERIES OF MAINE

PO Box 287, South Berwick, ME 03908

September 23, 2020

Dr. John Quinn, Chairman
New England Fishery Management Council

VIA ELECTRONIC MAIL:

Dear Dr. Quinn:

We write to express continuing concerns about the development of Amendment 5 to the Skate Fishery Management Plan.

The Council initiated the development of this amendment to address three issues¹:

1. Limited access qualification criteria that would determine whether vessels may target skate. These criteria may differ by stock or management area and may treat older history differently than newer history;
2. Limited access permit conditions (transfers, ownership caps, 'history' permits etc.); and
3. Permit categories and associated measures.

It is clear that the Skate Committee has gone far beyond the issues described in the Amendment scoping document in developing objectives (or types of measures) to achieve the goals (see page 4 Skate Committee report, Sept. 10, 2020).

Objectives 1 and 3-8 go well beyond the issues identified at scoping. As we understand objective 3, the Committee would impose a sub TAL on the groundfish, monkfish and scallop fisheries. The original skate FMP acknowledges that the food (wing) fishery has historically been prosecuted as a component of these fisheries.

As we have communicated in our February 2017 scoping comments, our March 2017 letter to the Committee and our June 2020 letter to the Council, the skate food (wing) fishery is not an open access fishery. In order to possess more than the incidental catch of skates, groundfish, scallop, and monkfish days-at-sea must be used.

The Committee's expressed concern about increased or re-directed effort is simply not supported by the data presented to the Committee. The participation data in the draft Amendment 5 shows a steady reduction in the number of participants from 572 to 392 from 2009-2018 (table 1). There has been consistent entry and exit in the fishery (tables 2&3) – and when some new vessels have entered, more than double that number have exited in the same year.

We urge the Council to reject all the objectives that are suggested by the Committee that are not related to limited entry. If the Council accepts these objectives, we urge the Council to re-scope this Amendment.

If the Council decides to re-scope, we urge the Council to strike from the objectives a new limited entry program for the food (wing) fishery. The food (wing) fishery is not an open access fishery. We do not have a position on limited entry for the bait fishery - the only part of the fishery that is truly open access.

We also urge the Council to strike objective #3 as this objective has the potential to negatively impact the successful prosecution of the groundfish, monkfish and scallop fisheries.

Sincerely,

M. Raymond

Maggie Raymond
Executive Director

ⁱ Skate Scoping Document, page 8, 2017.