



April 11, 2018

John F. Quinn, Ph. D., Chairman  
New England Fishery Management Council  
50 Water St. Mill 2  
Newburyport, MA 01950

Dear John,

I am writing on behalf of the Northeast Seafood Coalition ("NSC") in regards to the upcoming Council discussion concerning Northeast Fishery Sector IX and Northeast Fishery Sector VII.

Many members of the Council will remember that NSC was the sponsor of the Northeast Fishery (NEF) sectors in accordance with the Amendment 16 process.

Consistent with its longstanding support for family-owned businesses and a diverse fishery, NSC sponsored and designed the NEF sectors to be inclusive of the full diversity of fleet and community demographics that were representative of the entire groundfish fishery. Each NEF sector was established as an individual 501(c)(5) corporation with the ability to exercise independent, sovereign control over its allocations and internal decision-making process.

Since Amendment 16 was implemented, NSC has continued to serve as the entity that engages in policy, scientific and legislative matters on behalf of its individual members that predominantly operate within the NEF sectors. Additionally, due to our knowledge and experience acquired over the many years of engaging in the policy process, NSC is often sought to offer policy guidance and advice on a host of matters as they may relate to the federal groundfish fishery. It is in this capacity and context that we write to the Council today.

As many Council members are painfully aware, the 28 offenses to which Mr. Rafael pled guilty and is now incarcerated for have created enormous turmoil throughout the fishery and the region. Part of the turmoil concerns the broader fishery management implications of starting a new fishing year with such a significant portion of the fishery's sub-ACL not being made available to the fishery.

NSC recommends that the Council provide the Agency with their primary objectives and request the Agency use their administrative authority to consult with the respective sector boards to achieve the stated objectives.

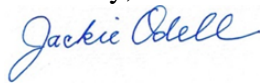
NSC recommends the following objectives:

- ACE overages be identified and paid back to the system. The timing and result of the resolution shall be consistent with a result that would have been possible had the 2018 NEF Sector 9 roster been the same as 2017.

- Conditional upon resolution of the NEF Sector IX overages, ensure the groundfish sector system has access to the ACE associated with permits that are enrolled in NEF Sector VII.
- Work with the NEF Sector VII to ensure the conditions they've listed in their March 26, 2018 letter are met and upheld.

NSC fully condemns the actions to which Mr. Rafael pled guilty. This letter concerns the collateral impacts of those actions on others in the fishery. NSC feels strongly that it is essential to address and minimize those collateral impacts on the rest of the fishery, and it is in this spirit that we offer our suggestions to the Council.

Sincerely,



Jackie Odell, Executive Director