

New England Purse Seiner's Alliance

October 5th, 2018

Thomas A. Nies, Executive Director
New England Fishery Management Council
50 Water Street, Mill #2
Newburyport, MA 01950



Re: SSC Committee Atlantic herring discussion, 10/10/18 Meeting

Dear Tom,

We are writing today to comment in regards to the SSC Committee's upcoming discussion of Atlantic herring science and quotas. The New England Purse Seiner's Alliance (NEPSA) is an industry group consisting of purse seine vessels that fish the inshore Gulf of Maine. Our vessels supply fresh herring exclusively to U.S. lobstermen during times of peak bait demand. We are long-time participants in the fishery and have a vested interest in the future health of the herring resource.

Although the purse seine fleet has long been warning managers and scientists of potential resource problems, it is an understatement to say the swift change in the science has caught our fleet off guard. After being told just last year—and for many years prior—that the herring biomass was at “historic” levels, we are now facing quota cuts that may devastate our traditional fishery. These cuts will, in turn, cause severe economic harm for both the lobster industry and the entire coastal economy of Maine. To say that a disaster is looming is not hyperbolic. To be honest, it is hard to understand how the science changed so dramatically and so abruptly.

Moreover, the decision to implement a new Control Rule—i.e. additional quota cuts—at the same time as a massive assessment-driven cut will only make matters worse. While caution is a good thing, it is our understanding that, had the proposed CR been in place the last 6 years, it would have had no meaningful impact on landings. In other words—even if you believe the problem today was caused by quota levels—had the CR been in place, it would have theoretically done nothing to keep us out of the hole we are now in. Furthermore, it is our belief—a belief shared by most fishermen in New England—that the lack of recruitment driving the pessimistic assessment is driven more by *how, where, and by whom* the herring has been caught than by the quota on paper. Specifically, the immense pressure by pair trawlers on spawning aggregations has done more harm than anything else. How can you have strong recruitment if you do not let fish spawn?

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Although the near-term efficacy of the proposed CR is questionable at best, the impact it will have on our fleet is not. The difference between a total quota based on the current law and one based on the new CR is quite possibly the difference between there being a directed herring fishery next year or not. We would have much preferred for the Council to chose a CR but then delay its implementation for three years to mitigate the economic harm it will precipitate. That said, it is our hope that GARFO will ultimately bring some relief in its 2019 Interim Action by choosing a quota based not on the CR but on the current MSA guidelines. There is no doubt in our mind that it is *more than reasonable* to fish at this level in 2019.

But regardless of the decision made by NMFS for 2019, the fact remains that the proposed quota numbers for 2020 are devastatingly low. In that year, the CR will be in place and there will be no flexibility whatsoever—and one look at the possible total quota will leave no doubt as to the impacts it will cause. **As such, we are formally requesting the SSC to instruct the NEFSC and the PDT to run an update on the herring assessment prior to the 2020 fishing year. This update should be used to guide and inform the development of the Specifications for 2020 and beyond.**

We are asking the SSC to do this for two reasons. First, the changes in the science this year are so dramatic that we believe an update next year is warranted in its own right. This is not a small change, and the science must be watched closely. Second, and more specifically, there are strong signs of a possible average or above-average year class showing up in the New Brunswick weirs and along the Maine coast. These two year old fish may (or may not) be a sign of a resource turning around. But if we wait three years to run the next assessment, the relief that a new strong year class could bring will come too late. We must look at this all again as soon as possible.

Fishery science is inherently complicated and difficult. While we have been begging for managers and scientists to make changes for years to avoid a crisis, we know that the jobs of counting and managing fish is as tough as any job—and that mistakes will happen. That said, we believe it is imperative for both scientists and managers to work especially hard in situations like this one to ensure the survival of the fleet. It is not good enough to slash quotas dramatically and then come back three years later and hope we are all still here. All of us need to work together to find a solution that rebuilds the herring resource while minimizing the pain on the fishermen as much as possible. The least we can do is to run the assessment again next year (and annually thereafter) to make sure our decisions on quotas are as sound as possible.

Thanks for your time and consideration,

Barry Matthews, F/V Ocean Venture
Glenn Robbins, F/V Western Sea
Mark Bichrest, F/V Ruth & Pat
Doug Mayo, F/V Scout