



October 28, 2011

Mr. Terry Stockwell, Chair
Groundfish Oversight Committee
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, MA 01950

BOARD OF TRUSTEES

RE: Prioritize Amendment 18

Dear Mr. Stockwell,

On behalf of the Northwest Atlantic Marine Alliance I am writing to support the timely continuation of the process that has been put in motion for groundfish Amendment 18 as a path to address concerns fishermen have raised about protecting diversity in the groundfish fleet. We believe, as the Council and Committee have indicated, that this amendment offers a clear path toward achieving currently unmet goals and objectives of Amendment 16 and to address concerns raised by many fishermen about the health of the fish stocks and the viability of their businesses within the context of sectors. Issues that have arisen and remain serious, such as localized depletion of near shore stocks and excessive consolidation of the fleet. These issues can be addressed through separate measures for inshore and offshore fleets, accumulation caps, and other possible strengthening provisions that can be explored during the Amendment 18 process and deserve to be fully discussed in a timely scoping process. **We urge you to begin this process in a timely manner by holding 8 or more scoping meetings throughout the region as suggested at the last Council meeting.**

The need for the fixes Amendment 18 can offer was made clear by the social and economic issues highlighted in the recently released reports, some of which were discussed at the recent Sector Workshop. These reports showed:

- 20% of vessels accounted for about 80% of the gross nominal revenues from groundfish sales.
- Clear consolidation of the fleet, which was agreed by agency and sector fishermen's comments alike.
- Uneven impacts on different parts of the fleet that resulted from economic burdens associated with sectors and cost of leasing quota.
- The number of boats actively fishing was clearly down.
- Net revenues for small boats were down even though overall revenue was up.
- Consolidation of fishing effort was reported by most sectors.
- Sectors comprised of predominantly larger boats reported increased economic efficiency of operations.
- Only a few sectors reported success at timing fishing with market peaks,

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so that purported objective of sectors is unmet and many felt is unlikely to be met – especially for smaller boats because other factors play such a large role in when effort is greatest.

Despite the information at hand, the recent Sector Workshop was disappointing in the lack of detailed comparative data that could shed light on how different sectors work (due to the lack of transparency caused by concessions to “proprietary information”). Nevertheless, the Workshop was informative as to the general effects on the fleet, including clear evidence in both the yearend report by NMFS and the economic and social analysis by the Science Center. We also noted the clear and disproportionate impacts on smaller (30-50 feet), day boat fishermen whose revenues were down nearly 20% between 2009 and 2010 while revenue of vessels over 75 feet was up 35%. We ask the Committee to be sensitive to the issues impacting fleet diversity, and to value the formal process of airing these issues and discussing possible solutions. The scoping process for Amendment 18, if conducted in a thorough manner, will allow this.

The dramatic split between the sector experience of small dayboat fishermen and that of large trip boat fishermen, especially those operations with several affiliated vessels, became more and more apparent as the workshop progressed, which led some to suggest there should be a distinction in how quota based management is implemented in inshore and offshore fleets. This is an issue included in the scoping document for Amendment 18 and deserves a full-fledged discussion in that context. Similarly, other measures should be discussed that could stabilize fleet diversity and enable a fishery with operational scales and yields that are consistent with and as diverse as the ecosystem that supports it.

Fishermen who feel threatened by Amendment 18 suggest that rather than focus on changes to the current system we need to stabilize management and fishing operations. They fear Amendment 18 is going to change everything, again, and they will have to adopt yet another new system, which they feel is unfair to the businesses they have successfully established within the current structure of Amendment 16. We disagree and believe improving sectors will not disrupt how they are set up but rather will provide fairness and stability to all sector members over the long term.

There was mention at the Workshop that we now see winners and losers emerging and that adding constraints to the system would merely change who are the winners and who are the losers. What this doesn't address is the biggest loser appears to be the ocean. Reports by fishermen of localized depletion due to trip boats fishing inshore are on the rise. And recent concerns that the cod fishery is once again in trouble, despite reports within the last year that some of the sub stocks had almost fully recovered, are alarming. New measures offered through Amendment 18 can address the risks of localized depletion by matching vessels to the ecosystems appropriate for their scale of operation. In addition, it would help achieve optimum social, economic, and ecological stability. We know from other fisheries that allowing initial winners in rapid consolidation does not result in a diverse fleet. And we also know that diversity is key to long-term ecological, social and economic stability.

As long as the resource is in danger of depletion due to disproportion fishing impact as we have seen over the past year with the migration of the offshore fleet into inshore waters, the ecosystem cannot sustainably support large winners, and TACs and catch will fluctuate

as stressed fish populations do regardless of attempts to achieve stable business plans.

The best we can hope for is maintaining viability and stability across the fleet while groundfish continue to recover, and maintaining a level playing field for business in environmentally, socially and economically sound fisheries. Amendment 18 offers the path for achieving this. The vision for the future should include a diverse fleet that operates with restraint under a quota system with rules that permit the resource and fishermen to thrive. We are very concerned that continuing the current trends of sector management will not only drive out the small boat fleet, but in the end will further deplete the resource. Amendment 18 offers an opportunity to pay attention to the ecosystem as well as the fleet, without changing the fundamental principles set out in Amendment 16 – in fact, as we've said many times, it should enable the achievement of the original goals and objectives, which continue to be supported by the Council.

The Fleet Diversity Amendment 18 will refine, not upset, the future of sector management in New England. It will benefit the fleet as a whole as well as the health of the groundfish populations, individual fishermen and their communities. We need a diverse fleet to fish in the diverse ecosystems of the region. **We strongly urge you, at the upcoming Committee meeting, to move the Amendment 18 scoping process forward with a full complement of scoping meetings designed to encourage broad, open, and respectful participation throughout New England fishing communities.** The Council has voted to move forward and we trust the Committee is eager to make that happen. And now, in addition, we urge the Council to continue keeping this in motion by once again prioritizing Amendment 18 for the upcoming year.

We look forward to the scoping process as a means of establishing both short and long-term visions for the fleet and a process for airing concerns about how sectors are working and to enact measures that would enable them to work better and more predictably. We do not see this as an attempt to change the management structure but to improve it for the ultimate benefit of all fishermen in the system.

We hope you will revisit the Fleet Diversity Pledge, submitted to the Council September 2011, to see that moving forward with this amendment has the support of fishermen from throughout the region as well as seafood consumers, marine conservation advocates, and fishing community leaders. Over 1,200 of them signed the petition asking you to make Amendment 18 process a high priority. We urge you to listen to their voices and move forward on fixing the sector management system by giving Amendment 18 its due process, proper staff attention and appropriate opportunity be developed.

As always, we look forward to working with you and the rest of the Council on this process.

Sincerely,



Brett Tolley
Community Organizer