



April 13, 2011

New England Fishery Management Council  
50 Water Street, Mill 2  
Newburyport, MA 01950

RE: Amendment to Address Fleet Diversity and Accumulation Limits

Dear NEFMC Groundfish Oversight Committee,

BOARD OF TRUSTEES

Bill Adler  
*Massachusetts Lobstermen's  
Association*

Niaz Dorry  
*NAMA Coordinating Director*

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*Coordinating Director*

Boyce Thorne Miller  
*Science & Policy Coordinator*

Brett Tolley  
*Community Organizer*

Sean Sullivan  
*Marketing, Development and Outreach  
Associate*

On March 17, 2011 the Groundfish Committee passed a motion: To recommend to the Council to postpone further Committee discussion of accumulation caps until after the July sector workshop. (8-3)

On behalf of the Northwest Atlantic Marine Alliance (NAMA) **we strongly encourage the Committee to continue discussion regarding goals and objectives for an amendment to address both fleet diversity and accumulation caps.**

The Council has already outlined general goals and objectives. For example, on June 23, 2010, the Council passed a motion stating the following goals related to the issues of fleet diversity and consolidation:

- 1) Maintain inshore and offshore fleets;
- 2) To the extent possible, maintain a diverse groundfish fishery, including different gear types, vessel sizes, geographic locations, and levels of participation;
- 3) Maintain a balance in the geographic distribution of landings to protect fishing communities and the infrastructure they provide; and
- 4) Prohibit any person from acquiring excessive access to the resource, in order to prevent extraction of disproportionate economic rents from other permits holders.

Further discussion on goals and objectives must continue if there is to be a meaningful analysis following the July workshop. It is critical that the evaluations of fleet consolidation during the first year of sector management be based on criteria that have been decided well ahead of time. Continuing council discussions during the April and June council calendars will permit agreement on clear goals and criteria for measuring success.

Otherwise, how will you know if sector management has been successful? What are the socio-economic indicators? Yet the committee motion from March 17 seeks to postpone the discussion until the numbers around fleet consolidation are out. This is not responsible management.

In conjunction with the information from the workshop, there should be a

clear idea of what actions might be effective and necessary under a variety of management scenarios that may play out now or in the future. In other words, you can plan ahead.

Based on the Council Staff's strawman report titled, "Considerations for Goals and Objectives Related to Fleet Diversity" there are several tools that may be appropriate in order to address fleet diversity. The report highlights that tools be determined based on clear goals and objectives. The report includes the following tools:

1. Control limits
2. New entrant set-asides
3. Owner-onboard requirements
4. Community development set-asides
5. Usage limits

As we have said on other occasions, we support Council consideration of all these potential measures for ensuring fleet diversity and reducing consolidation, and we note that they are often more effective when applied together rather than one being singled out. We also strongly recommend including in the list: "Transferability policies that foster an affordable and diverse fishery."

The Council staff has worked to provide Council members with a thoughtfully prepared report. Now is the opportunity to clarify the stated goals and to answer questions from the staff report such as:

"Does the Council want to add any clarification to goals that are vague, or is there any order of preference amongst the stated goals?"

"Is there any baseline the Council would like to consider to guide their definition of diversity? If so, what would it be? If not, how can the upcoming and any future sector performance reports account for adaptive management and still provide useful information?"

These questions deserve thoughtful answers. Postponing further discussion on these issues will risk losing any staff and council momentum that may be building; and it will surely do a disservice to all the communities, families, and individuals experiencing the effects of fleet consolidation.

We recognize the tremendous amount of time and effort that Council members and Council staff have already contributed to the analysis of Fleet Diversity and Accumulation Limits and we look forward to working with the Council as you move forward in this process.

Thank you,



Brett Tolley  
Community Organizer