

TO: New England Fisheries Management Council:
FROM: Ellen Tyler
RE: Amendment to Address Fleet Diversity and Excessive Consolidation
DATE: April 22, 2011

I am writing today in support of continued effort toward the Council's stated goals and to urge the Council to continue the discussion and research on this vital issue. NEFMC decisions affect the health our region, the natural resources on which they depend, the quality of our food, and how fairly the fishermen who catch it are paid.

In June 2010 the Council voted to:

1. Maintain inshore and offshore fleets,
2. Maintain a diverse groundfish fishery, including different gear types, vessels 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 permit holders.

This is commendable and requires action- particularly investment in research including gathering input from fishermen and fishing based communities. Continued discussion and research will help managers to achieve their own goals and objectives as well as the goals stated above.

Inaction is unacceptable, especially in light of the Council's recent report that states already 3 individuals own 41% of the George's Bank Winter Flounder. This is excessive consolidation, and to prevent further consolidation, a number of options exist.

A group of fishermen recommended the following potential solutions:

1. Leasing Policies - Under Days at Sea baseline leasing policies protected fleet diversity as well as made leasing/buying more affordable. Now there exists no such tool. There needs to be a tool in place that serves the same purpose as baseline leasing.
2. Owner-Operator - Policies that increase the ability and opportunities for owner-operators to succeed will help prevent excessive consolidation and lead to a more diverse fleet.
3. Initial Allocation - There exists inequities in the initial allocation that must be addressed. Tools such as quota-set aside programs can help to achieve the state goals above.
4. Accumulation Caps - Meaningful caps must be in place to prevent any one entity from acquiring an excessive amount of quota.

The Council has a duty and responsibility to address these issues- to research them and bring them back for discussion. I urge you to work in good faith to deeply consider all of these options, and weigh in with your constituents as often as possible. I look forward to being in touch.

Sincerely,
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