



September 20, 2011

Mr. Rip Cunningham, Acting Chair
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, MA 01950

RE: Amendment 18 Scoping Document

BOARD OF TRUSTEES

Bill Adler
Massachusetts Lobstermen's Association

Amanda Beal
Board Clerk
Maine Eat Local Food Coalition

Charles Curtin
*Environmental Science Faculty
Antioch College, NH*

Niaz Dorry
NAMA Coordinating Director

Shannon Eldredge
Fishing Family, Chatham, MA

Louis Frattarelli
Commercial Fisherman, Bristol, RI

Madeleine Hall-Arber, Ph.D.
Board Vice President
MIT Center for Marine Social Sciences

Ted Hoskins
Board President
Stonington Fisheries Alliance

Jamey Lionette
Board Treasurer
Sustainable Business Network

Karen Masterson
Restaurant Owner

Neil Savage
Aquaculture Education and Research Center

Ed Snell
Commercial Fisherman, Portland, ME

STAFF

Niaz Dorry
Coordinating Director

Boyce Thorne Miller
Science & Policy Coordinator

Brett Tolley
Community Organizer

Sean Sullivan
Marketing, Development and Outreach Associate

Dear Mr. Cunningham,

In June the Council tasked its Groundfish Committee to develop a Scoping document and proceed with an amendment to address fleet diversity and excessive consolidation. **On behalf of the Northwest Atlantic Marine Alliance we would like to support the Council approving the Amendment 18 scoping document. In addition, attached you will find a petition signed by over 1,200 individuals, including fishermen and those who eat their catch, also encouraging you to move forward on Amendment 18 scoping process.**

We applaud the Council for acknowledging the fact that, as stated in the scoping document, current sector management leads to consolidation and lack of diversity in the groundfish fishery. We know, from the goals and objectives stated in Amendment 16, that the Council *intended* for the new management regime to maintain a diverse groundfish fishery and to minimize adverse impacts on fishing communities. But we also know that Amendment 16 did not successfully meet these objectives and in fact is leading to loss of diversity through rapid consolidation.

Amendment 18 offers an opportunity to now accomplish what Amendment 16 failed to do: ensuring a diverse fleet and preventing excessive consolidation. This is no surprise to us as we know Catch Share programs elsewhere have led to similar consequences and had deleterious effects on marine based food systems and fishing community infrastructure and all the while not achieving their ecological objectives. Consequences of consolidation in the New England groundfishery can be expected to include:

- Loss of biodiversity;
- Undermining the Council's ecological goals;
- Hurting infrastructure as well as access to local fish;
- Creating a fishery that is unaffordable for independent fishermen;
- An unstable seafood supply for regional markets and local food systems;

- Loss of direct and indirect employment in fishing communities; and
- Discouraging young fishermen from entering the fishery.

We want to emphasize that the impacts of consolidation extend beyond shifting the historical make-up of the fleet to include ecological, social, and economic consequences that may threaten the Council's goals heading into the future.

Over the past year NAMA has provided the Council with information about how uncontrolled consolidation in Catch Share programs leads to a lack of fleet diversity and excessive ownership.^{1 2} We have also provided testimony and information about how excessive consolidation has led to unstable food systems round the world, which is relevant to the growing interest in keeping locally grown and fished food in local communities for increased economic, health and nutritional benefits. We are concerned that consolidation in the groundfishery will continue to prevent a reliable source of local seafood in our communities, schools and hospitals as we watch the export market take priority over local access to seafood.

The scoping document is a starting point to inform the public and begin the scoping process. The goal of the process is to identify the range of issues surrounding fleet diversity and excessive consolidation. The Council has devoted significant time and resources to the issues and there is no justification at this point to delay the process any further. Therefore, we recommend the Council vote on the Amendment 18 scoping document and start the scoping process so together we can explore solutions that keep the fish and fishing communities health for generations to come.

Sincerely,



Brett Tolley
Community Organizer

¹ "Addressing the Ecological Implications of Consolidation and Quota Accumulation Under Amendment 16", submitted by NAMA to the Council September 2, 2010.

² "Maintaining Fleet Diversity in the New England Groundfish Fishery" submitted to the Council June 5, 2011.