



May 6, 2011

DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
RIN # 0648-BA88

RE: Control Date to the Northeast Multispecies Fishery

On behalf of the Northwest Atlantic Marine Alliance we support a control date to the Northeast Multispecies Fishery in order to limit the accumulation of excessive control or ownership of fishing privileges in the NE multispecies groundfish fishery.

BOARD OF TRUSTEES

Bill Adler
*Massachusetts Lobstermen's
Association*

Niaz Dorry
NAMA Coordinating Director

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

Ted Hoskins
Saltwater Network

Sarah Pickell
Board Treasurer
Institute for Local Self Reliance

Curt Rice
Board President
Commercial Fisherman

Neil Savage
*Aquaculture Education and Research
Center*

STAFF

Niaz Dorry
Coordinating Director

Boyce Thorne Miller
Science & Policy Coordinator

Brett Tolley
Community Organizer

Sean Sullivan
*Marketing, Development and Outreach
Associate*

Both the Magnuson Stevens Act as well as the NE regional Groundfish Fishery Management Plan state explicit goals/standards related to preventing excessive shares and excessive fleet consolidation. Achieving management goals and objectives should be a priority for managers regardless of the management system. Setting a control date is one step in the right direction yet there needs to be more.

In New England we already know that excessive consolidation is happening. A New England Fisheries Management Council (NEFMC) staff report in January 2011 titled, "Fleet Diversity and Accumulation Limits in the Groundfish Fishery" states that the top three Massachusetts quota holders own 10-20% of 11 different stocks, 20-25% for one stock, and 41% of George's Bank Winter Flounder. Clearly, there already exists excessive consolidation yet there is no concrete plan to address the issue.

We ask that NOAA support the NEFMC to further develop the research, engage all stakeholders, and adopt the necessary tools in Amendment 18 in order to achieve the as of yet unmet goals of Amendment 16. In addition we urge that NEFMC also address unmet goals/standards related to maintaining fleet diversity.

The NEFMC staff created a strawman report titled, "Considerations for Goals and Objectives Related to Fleet Diversity". The report lays out several tools that may be appropriate in order to address fleet diversity. 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

We recommend a sixth tool: "Transferability policies that foster an affordable and diverse fishery."

We know that uncontrolled 'Catch Share' programs around the world have consolidated into monolithic, industrial scale, non owner- operator fishing fleets. This direction undermines communities, ecosystems, and our food system.

Experience of U.S. farm policy has taught us that uncontrolled consolidation results in large- scale factory farming corporations driving out family farmers and degrading the land based environment, biodiversity, and security of the food system. It also destroys the fabric and vitality of farming communities. If we don't act, we can see the same pattern repeated on the water.

New England can lead the way toward a new direction.

Thank you,

A handwritten signature in blue ink, appearing to read "Brett Tolley".

Brett Tolley
Community Organizer

A second handwritten signature in blue ink, identical to the one above, appearing to read "Brett Tolley".