

October 16, 2011

Paul Howard, Executive Director

New England Fishery Management Council

50 Water Street

Newburyport, Ma 01950

Mr. Howard:

Please find below responses to the Council's request for information in advance of the scheduled NEFMC sector workshop. During the first year under sector management, I was not employed as the Manager for Northeast Fishery Sector VII & VIII, my position was Sector Administrator. My responses are based on conversations I had with the members of these two sectors, fellow managers as well as my general observations as Sector Administrator in Fishing Year 2010 - 2011 and since I have taken on the role of Manager during Fishing year 2011 – 2012.

1. What ran smoothly in your sector?

Nothing. The first year was chaotic, confusing and much disorganized. Trying to learn and navigate through the new systems was a challenge not only for the Sector Mgrs, Fisherman but also NMFS. It seemed to me the rules and procedures were being changed with no regard of the impact it ultimately was having on Sectors. With that said I believe that the lessons learned from last year have made the first half of year 2 of the Sector a little more efficient as we are aware what is expected of the Sector Mgrs, and the fisherman.

2. What are the top five problems your sector encountered that impeded operations from running smoothly?

- Mid-season adjustments to the sub-ACLs for Georges Bank Yellowtail Flounder taking 17% away. Adjusting the sub-ACLs for Pollock adding 6 times the original

amount allocated. This not only affected the Sector's annual catch entitlement but also had an impact on all trades that had occurred prior to these adjustments.

- Dockside Monitoring was imposed immediately for vessels fishing in sectors. It did not replace dealer reporting it was merely a duplication of what was being unloaded from the vessel, the Dockside monitors, not all, could not add and caused interruption with the unloading process. Not sure where this information was used.
- Sector Vessels were forced to discard yellowtail that was just under the legal size limit of 13 inches, resulting in the Vessels losing potential income because they could not land these marketable fish and Sectors encountered a higher discard rate bases on observed trips which resulted in even less ACE being available to their vessels for harvesting. A similar situation occurred with American Plaice ('Dabs').
- Vague instructions regarding data management and reconciliation with the Agency which led to uncertainty of the sector's overall ACE usage during the year.
- Re-opening the Sector membership enrollment process 3 times was extremely disruptive. Sector Managers who scrambled in July 2 months into the fishing year to re enroll their members only to reopen the enrollment again in September, and again in November. It created mistrust with the members and deadlines to the members meant nothing.

3. What potential modifications to the FMP do you think would be helpful for the sector operation?

Amendment 16 enabled sectors to carry up to 10% of unused ACE forward into the next fishing year, with the exception of Georges Bank Yellowtail. The transition to the sector management system has greatly altered fishing behavior and business practices learned through the DAS system. Sectors, and their respective members, are still learning how to operate effectively given the ACE constricts imposed by the allocation methodology, modified business practices and financial woes. My suggestion that will provide much needed transitional flexibility is the ability of a Sector to carry over a larger percentage of unused ACE from one fishing year to the next, taking into consideration ACL requirements and the biology of a given stock.

In order to increase the opportunity for vessels to land marketable fish such as GB Yellowtail and American Plaice it is my suggestion that the council evaluates the current

minimum mesh size requirements in correlation with the minimum fish size requirements and initiate an action to reduce the minimum fish size fishery wide for stocks like GB Yellowtail and American Plaice.

Bearing the cost of At-Sea Monitoring in the upcoming fishing year is an additional cost that the members of NEFS VII & NEFS VIII cannot afford to incur. The Council needs to take immediate steps to address this prior to the start of the next fishing year.

Thank you for your interest in how Sectors operated in the first year and soliciting our experiences and recommendations for the successful future of Sectors and their Members for years to come.

Linda McCann, Sector Manager
NEFS VII & VIII

Cc: Anne Hawkins, NEFMC
William McCann, President NEFS VII
Felicio Lourenco, President NEFS VIII