

#3

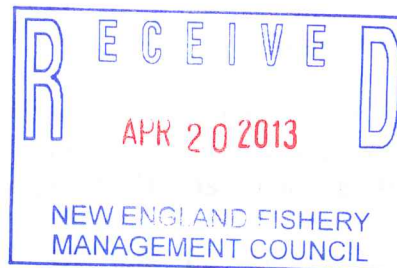
**ASSOCIATED FISHERIES OF MAINE**

PO Box 287, South Berwick, ME 03908

April 18, 2013

Mr. Rip Cunningham, Chair  
New England Fishery Management Council

VIA ELECTRONIC MAIL



Dear Rip:

On April 23 the New England Fishery Management Council (NEFMC) will receive a summary report from the conclusions of the Stock Assessment Review Committee (SARC) for white hake, as well as a recommendation from the groundfish committee for emergency action to modify the 2013 annual catch limit for white hake. Associated Fisheries of Maine (AFM) supports the request for emergency action.

The SARC reports from individual reviewers reveal a serious issue with the calculations and decisions around a recommendation of Fmsy proxy for white hake, and AFM urges the NEFMC to take the time to read the reviewer reports. All three reviewers include recommendations for policy guidance from the NEFMC with regards to setting the Fmsy proxy and the biological reference points.

I have excerpted the specific recommendations from those reports, for the immediate convenience of the NEFMC (see attached). AFM requests that the NEFMC take up consideration of these important recommendations at the earliest convenience.

Sincerely,

*M. Raymond*

Maggie Raymond

White Hake Peer Review, recommendations by peer reviewers with respect to determining appropriate BRPs and the Fmxy proxy

Stokes: page 41

**4. I would recommend a fundamental review is needed by the relevant Councils, with input from SSC, with a view to providing guidance to SAW on reference point setting. This is effectively repeated at (8) below.**

**8. I recommend that the NEFMC consider the issue of risk standards and development of guidance to SAW (see also 4, above).**

Smith:  
Page 31

The Review Panel accepted the approach as a valid method of setting reference points, but requested that the explicit risk levels be provided for each scenario. One reviewer commented that the 5% risk level is precautionary and that 10% is widely used. **However, the Panel also felt that the acceptable level of risk should really be set by managers rather than at a technical meeting of scientists and industry.**

Page 32:

**It is also worth reiterating my view that the decision on acceptable risk levels should be made by managers and that in order to get a full picture of both the potential risks and benefits it would be useful to have figures for yield changes as well as risks in this analysis.**

Cryer  
Page 21

**I believe there is a need for improvements to the policy framework here, and that the working groups are in need of more guidance on the development and estimation of BRPs.**