UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
NORTHEAST REGION
55 Great Republic Drive
Gloucester, MA 01930-2276

MAY 21 2012

Mr. Paul J. Howard
Executive Director
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, MA 01950

Dear Paul:

Following the Council's February 1, 2012, meeting you requested on behalf of the Council that I expedite the approval of a sector exemption request that would enable a targeted redfish fishery by authorizing the use of a 4.5-in. mesh codend. The exemption request was primarily based on the preliminary results of a sub-component of a cooperative research project titled, "REDNET: A Network to Redevelop a Sustainable Redfish (*Sebastes fasciatus*) Trawl Fishery in the Gulf of Maine." At the time of your request, the results of this project, although promising, were preliminary and had not been finalized by the research team or technically reviewed.

We recently received the REDNET final report for the project sub-component that proposed to establish a baseline for catch and bycatch in a directed redfish fishery using a 4.5-in. mesh codend. This report was technically reviewed by the Northeast Fisheries Science Center. Given the Research Steering Committee's traditional role in evaluating cooperative research results applicable to fisheries managed by the Council, I am requesting they also review the results of this project and the technical review comments at their next meeting. Their timely review of these results would help inform our consideration of this sector exemption that, if approved, would enable a targeted redfish fishery using a 4.5-in. mesh codend.

Thank you for your consideration of this request.

Sincerely,

Harold C Mears

for

Daniel S. Morris
Acting Regional Administrator

Attachments (2)

(3)

New England Fishery Management Council
50 WATER STREET | NEWBURYPORT, MASSACHUSETTS 01950 | PHONE 978 465 0492 | FAX 978 465 3116
C. M. "Rip" Cunningham, Jr., *Chairman* | Paul J. Howard, *Executive Director*

February 7, 2012

Mr. Dan Morris
Acting Northeast Regional Administrator
NMFS/NOAA
55 Great Republic Drive
Gloucester, MA 01930-2298

Dear Dan:

During the groundfish discussion at the NEFMC's meeting on February 1st 2012, the Council requested two actions that they feel will help mitigate the impacts of low Gulf of Maine (GOM) cod catch levels that are expected in FY 2012. This letter is intended to serve as a request for the following items:

1. The Council requests that NMFS consider the recently revised estimates of recreational GOM catches in FY 2010. The new MRIP data, which has recently been released, shows that the recreational fishery did not exceed its sub-ACL for this stock, as was previously believed when the MRFSS data was used. In light of this new information, we would like to request that recreational accountability measures addressing GOM haddock be adjusted or removed by the most expedient method.

2. The Council would also like to ask that NMFS expedite approval of a sector exemption request that would facilitate targeting of redfish in the GOM. The Council received a presentation on the REDNET project and feels that an increased ability to target the abundant redfish stock will facilitate some fishery participants to be more profitable in the face of reductions in GOM cod ACLs.

Thank you for your consideration of these issues and cooperation on our shared commitment to finding solutions that will sustain our industry through the anticipated reductions in GOM cod catch. As always, please call me if you have any questions.

Sincerely,

Paul

Paul J. Howard
Executive Director

December 1 2011

Patricia Kurkul, RA
NMFS
55 Great Republic Ave.
Gloucester, MA 01930

Dear Pat,

The Sustainable Harvest Sector and Northeast Fishery Sectors submit the following exemption request for FY2012:

EXEMPTION FROM THE 6.5" CODEND MINIMUM MESH SIZE REQUIREMENT FOR TRAWL GEAR BEING UTILIZED BY SECTOR VESSELS ON A TARGETED REDFISH TRIP: Sector vessels will be authorized to utilize a codend mesh size that is 4 1/2" or larger on trawl gear for directed redfish trips. Sector Vessels utilizing this exemption, must notify their Manager a minimum of 48 hours in advance of their trip and are required to have 100% observer coverage for all trips utilizing this gear. Furthermore, Sector Vessels utilizing this exemption will be required to submit daily catch reports to their Sector Manager, to ensure catch is harvested within the sectors ACE.

Justification: The Sustainable Harvest Sector and the Northeast Fishery Sectors were allocated a substantial amount of Redfish ACE for both Fishing Year 2010 & 2011 At the start of the 2010 fishing year, sector members predicted a harvesting efficiency of 40% for redfish using commercial trawl gear allowed under the current federal regulations, §648.80 (a) (3). Final accounting of FY 2010 NE Multispecies Catch shows that the fishery as a whole harvested only 31% of the Redfish ACL. This low harvesting efficiency resulted in a loss in revenue to the individual vessels as well as the Northeast Fishery sectors through operational fees collected on landed catch. Recent codend selectivity research by the Gulf of Maine Research Institute shows this estimation of efficiency to be at the high end. Eayrs (2008)[1] demonstrated that a 6.5" diamond mesh codend only retained 21% of legal sized redfish by weight. The following year, retention of legal sized redfish was only 5% for the same codend configuration and 4% retention was calculated for a 6.5" square mesh codend (Eayrs 2009)[2]. Eayrs concluded that these codend mesh sizes were too large to retain legal sized redfish and that a substantially smaller mesh size would be required to optimally harvest redfish.

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[1] Eayrs, S. 2008. Evaluation of the selectivity of four codends in the New England groundfish fishery. Final Report. Gulf of Maine Research Institute. Portland, Maine.

[2] Eayrs, S. 2009. Evaluation of the selectivity of four codends in the New England groundfish fishery. Draft Final Report. Gulf of Maine Research Institute. Portland, Maine.

Traditionally, the directed redfish fishery was conducted using a small mesh (~3") codends (Mayo et al. 2006)[3]. In 1977 the minimum allowable mesh size increased from 4 ½" to 5" and by 1994, the minimum mesh size had increased to 6". These increasing minimum mesh size restrictions were in part the cause of the elimination of the directed fishery. Northeast Fishery Sectors requested exemption from the 6.5" codend minimum mesh size requirement for trawl vessels targeting redfish for FY 2011 and were denied because the Agency was/is funding a study conducted by the Massachusetts Division of Marine Fisheries in conjunction with SMAST, the Maine Department of Marine Resources, and the Sustainable Harvest Sector to investigate strategies and methods to sustainably harvest the redfish resource. Information from that study is now available, and demonstrates that a directed fishery for Redfish will have minimal impact on undersized Redfish and minimal impact on other groundfish species.[4]

While the Sustainable Harvest and Northeast Fishery Sectors understand the Agency's protective rationale behind denying this request, it is resubmitting it again this year based on the new supporting documentation provided by the "report". Catch share systems such as sectors allow fishermen to plan their businesses better and be more selective about when and how they catch their harvest share because they know their percentage share of the Sectors ACE is secure.

The sector catch share system should enable sector members to plan their fishing schedules in response to market, weather, and individual business conditions thereby improving economic efficiency. Exemptions such as this further the intent and purpose of the Sector catch share system and the much needed flexibility and efficiency touted as a benefit of catch shares.

This exemption will be used throughout the fishing year by vessels in the Sustainable Harvest and Northeast Fishery Sectors.

This exemption if granted will provide positive benefits to the fishing operations of vessels that utilize it. As FY 2010 data shows 69% of the sector redfish allocation was not harvested which resulted in a loss of potential revenue to sector Vessels.

The Sustainable Harvest Sector and Northeast Fishery Sectors expects positive impact to sector operations if this exemption is approved because providing Sector Vessels a mechanism to address the low harvesting efficiency associated with the current regulations and directed redfish trips will not only result in increased revenue to individuals but will also provide additional revenue for the sector to cover its operational expenses by expanding the landings and associated fees of allocated stocks.

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[3] Mayo, R., L. Col and M. Traver. 2006. http://www.nefsc.noaa.gov/sos/spsyn/pg/redfish/

This regulation is codified in 50 CFR §648.80 (a) (3).

Additional Supporting Data:

- Kanwit, K, Pol, M., and He, P. 2011. REDNET summary of exploratory fishing (below).
- Redfish catch/discard tally by trip (attached as separate file).

Summary of REDNET exploratory fishing trips May - September, 2011

Co-PIs: Kohl Kanwit of ME Department of Marine Resources;
Mike Pol of the MA Division of Marine Fisheries;
Pingguo He of UMass Dartmouth School for Marine Science and Technology

"REDNET: A network to redevelop a sustainable redfish (*Sebastes fasciatus*) trawl fishery in the Gulf of Maine" is a collaborative research project funded by the NMFS Northeast Cooperative Partners Program. This project is a multi-faceted effort to explore the potential for a directed redfish fishery by conducting exploratory fishing, identifying the optimum mesh size, developing bycatch reduction devices, studying economics and marketing and conducting outreach.

Results from the first three trips of the exploratory fishing component of the REDNET project show sizable catches of the target species (redfish) and minimal catch of other regulated groundfish. Between May and September 2011, three vessels each went on a five day trip completing a total of 50 individual tows. They explored a large area of historic relevance to the redfish fishery in the middle of the Gulf of Maine at depths between 80 and 140 fm. The participating fishermen used a 4.5" diamond mesh codend to target redfish and identify if catch of other regulated groundfish would be problematic. The three trips resulted in a total catch of 118,323 pounds of kept redfish with 9,583 pounds of other regulated groundfish, the majority consisting of pollock (72%). All catch counted against sector allocations and the percent of regulated groundfish other than redfish by trip ranged from 12-18%. The percent of regulated groundfish other than redfish by tow ranged from 0-55% for tows where the total catch was over 100 pounds. Six tows had less than 100 pounds of total catch, including two 0 tows. Sublegal redfish catch (<9") was also minimal at 9,252 pounds discarded (7% of the total redfish catch). Discards of undersized groundfish, including redfish, ranged from 4 -12% per trip.

These results are promising and seem to indicate that a targeted redfish fishery can occur in the sector management system using smaller mesh codends without significant negative impact on other species of groundfish or the sublegal population of redfish. Additional trips will take place under the Experimental Fishing Permit issued by the National Marine Fisheries Service for the purposes of this work.

Sincerely,

Hank Soule
for the Sustainable Harvest and Northeast Fishery sectors