

ASSOCIATED FISHERIES OF MAINE

PO Box 287, South Berwick, ME 03908

207-384-4854

September 26, 2010

Mr. John Pappalardo, Chair
New England Fishery Management Council

VIA ELECTRONIC MAIL

Dear John:

RE: Scallop Amendment 15



I write on behalf of Associated Fisheries of Maine (AFM) to express our position on decision making in Amendment 15 that is relevant to the General Category IFQ fishery.

1) General Category AMs.

AFM does not support the use of an ACT in the general category IFQ fishery. LAGC vessel owners with an individual allocation are today able to track their usage on a real time basis via the NERO Fish-on-line webpage, thus there should be no issue with accurate catch tracking.

2) LAGC IFQ roll-over

AFM supports a decision to allow IFQ holders to roll-over up to 15% of the total original allocation into the next fishing year. IFQ owners will not feel obliged to fish under unsafe conditions in order to maximize IFQ catch within a fishing year.

3) Modification of the LACG possession limit

AFM supports elimination of the possession limit for the IFQ fishery, but would be satisfied with an increase in the possession limit to 1000 lbs/trip. In short, we believe that IFQ holders should be allowed to fish their allocations according to their own economic needs with the only constraint being a prohibition on exceeding that allocation.

4) Modify the maximum quota one vessel can fish

AFM supports modifying the maximum quota from 2% to 2.5%.

Thank you for your consideration of our views.

Sincerely,

M. Raymond

Maggie Raymond