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**NORTHEAST HOOK
FISHERMAN'S ASSOCIATION**

January 6, 2014

New England Fishery Management Council

50 WATER STREET | NEWBURYPORT, MASSACHUSETTS 01950 | PHONE 978 465 0492 | FAX 978 465 3116
Thomas A. Nies, *Executive Director*



Dear Enforcement Committee:

We represent a small group of Commercial Fishermen with the Limited Access Handgear HA Permits, employing the use rod and reel, handlines or tub trawls to catch Cod, Haddock and Pollock along with small quantities of other regulated and non-regulated marine fish. Historically and currently our fishermen account for a small percentage of the groundfish landed in New England. However, the monetary gains obtained by the participants in this fishery are very important to us.

We are requesting as one modification to the Handgear (HA & HB) vessel requirements (Under Amendment 18) that these vessels are no longer are required to carry a standard tote on board. The regulations now state:

*“(i) The vessel must not use or possess on board gear other than handgear while in possession of, fishing for, or landing NE multispecies, **and must have at least one standard tote on board.**”*

Our vessels are typically less than 25' in length and in some cases small open center console boats. Because of our fishing method (handgear) our catch is small and we must take great care of the little fish that we catch to get the best prices we can when sold. The majority of the fishermen using handgear catch the groundfish and immediately place them in marine coolers. We keep them well iced in the cooler thru the day to preserve the quality. At the dock the catch is quickly transferred off the boat and into totes (usually supplied by the fish dealers) carefully weighed, immediately re-iced and then to the dealer location or an auction facility (where they are again weighed). All our fish must be sold to federally licensed dealers and the dealer must report our catch. At the dock is where sometimes our fishermen may encounter fishery enforcement where the Officer observes the process and note the weight of the fish and quantity of each species. Our VTR (that we submit to the NMFS) is also reviewed where we list the quantity of fish and species.

On occasion we are sometimes boarded by at sea enforcement where we show the enforcement Officers the fish in the coolers. We do not have compartments or fish holds in our small boats. A trained enforcement Officer looking in the coolers can usually estimate the quantity of fish, species and the approximate weight. Typically a 100 qt cooler holds about 100 lbs of groundfish (with ice) and a 150 qt cooler holds about 150lbs of groundfish (with ice). Transferring the fish at sea into totes to measure the weight can be a difficult and in the summer this action will degrade the value of the fish due to the temperature change (especially on a hot summer day).

Because we keep our fish in coolers, loose totes in the boat are more often in the way than serving a useful purpose. They can be hazard in bad weather where they can come loose and bang around the boat. The totes on board usually end up being ad-hock storage containers for various gear since deck space is so limited on these small boats. Aside from scallop vessels we are not aware that other groundfish vessels are required by the regulations to carry totes.

We believe this requirement is no longer necessary and is serving a no real useful purpose. We are asking the Enforcement Committee to make the recommendation that Handgear vessels no longer be required to carry a standard tote for the reasons stated above.

Respectfully,
Marc Stettner /s/

NEHFA MEMBERS: Marc Stettner, Hilary Dombrowski, Paul Hoffman, Christopher DiPilato, Ed Snell, Scott Rice, Roger Bryson, Brian McDevitt, Anthony Gross, Doug Amorello, Timothy Rider, Karl Day

If you are a holder of a groundfish HA permit and wish to join the NEHFA, please contact the NEHFA at the address above.