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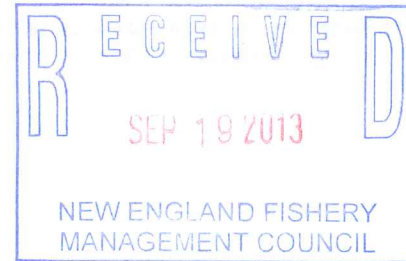
ASSOCIATED FISHERIES OF MAINE

PO Box 287, South Berwick, ME 03908

September 18, 2013

Mr. Terry Stockwell, Acting Chair
New England Fishery Management Council

VIA ELECTRONIC MAIL



Dear Terry:

The Emergency Action for monkfish will expire in October unless renewed by the NMFS for an additional six months.

I write to urge the Council to reiterate to the NMFS the recommendation made by a strong majority (13-2) at your April plenary session:

*The Council requests that the NMFS expedite modification of the final rule for the monkfish Emergency Action to increase the monkfish possession limit while fishing on a **groundfish** day at sea as follows: 600 lbs. (tailweight) per groundfish DAS for category D vessels and 1200 lbs (tailweight) per groundfish DAS for category C vessels in the NFMA only. (See attached correspondence from the Council to the NMFS.)*

It is important to note that the draft Framework Adjustment 8 includes an alternative, which was unanimously approved by the Monkfish Committee, to increase the monkfish possession limit while fishing on a groundfish DAS. While the Committee's recommendation differs from the Council's Emergency Action request with respect to the poundage increase, the intent to increase the possession limit while fishing on a groundfish DAS is the same.

The Council's monkfish Emergency Action recommendation was intended to provide economic relief from the restrictive groundfish regulations. To date, none of the Council's groundfish mitigation recommendations have been implemented by the NMFS and therefore there has been no economic relief for the industry.

Sincerely,

M. Raymond

Maggie Raymond

cc: PH, JC, FH, RF, Council (9/19)

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New England Fishery Management Council

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C.M. "Rip" Cunningham, Jr., *Chairman* | Thomas A. Nies, *Executive Director*

May 28, 2013

Mr. John Bullard
Regional Administrator, Northeast Region
National Marine Fisheries Service
55 Great Republic Drive
Gloucester, MA 01930

Dear John:

As you are aware, in consideration of NMFS' decision regarding the monkfish emergency action, to remove the monkfish trip limits while a vessel is on a monkfish day-at-sea (DAS) in the Northern Management Area (NMA), the Council voted (13/2/0) on April 25 the following motion:

the Council requests the NMFS to expedite modification of the final rule on the monkfish Emergency Action to increase the monkfish possession limit while fishing on a groundfish DAS as follows: 600 lbs. (tail weight) per groundfish DAS for Category D vessels and 1,250 lbs. (tail weight) per groundfish DAS for Category C vessels in the NFMA only.

This request revises the Council's original request to eliminate the monkfish trip limit for sector vessels fishing on a groundfish DAS in the northern area, an alternative that was considered but not adopted in the Emergency Action. The current request differs from the initial one in that it would not allow unlimited landings of monkfish on all groundfish DAS trips, but would apply current monkfish DAS trip limits on those trips.

The purpose of this request is to provide economic relief from restrictive groundfish regulations for vessels landing both monkfish and groundfish. As explained in earlier correspondence, the Northeast Multispecies Fishery is facing reduced Annual Catch Limits in FY 2013 for several key stocks. The most restrictive quotas are for the key stocks of Gulf of Maine cod and Georges Bank cod and will result in large reductions in revenue on groundfish fishing trips. Framework (FW) 48 suggested that revenue declines could be on the order of 40-60% from FY 2012, and several alternatives in FW 48 attempt to partially mitigate revenue losses.

The expected revenue declines are large enough that changes should not be limited to groundfish regulations. The requested emergency modification to the monkfish trip limit could increase the revenues on groundfish trips and provide a small measure of relief.

Concerns over this request might include the possibility of causing overfishing in either the Northern or Southern Management Areas (SMA) and a possible shift in monkfish fishing effort from the northern area to the southern area. In terms of potential overfishing, only 54% of the NMA target total allowable landings (TAL) and 45% of the SMA target TAL were landed in fishing year 2012 so substantially more monkfish could be landed without exceeding the TALs and would come closer to achieving optimum yield from the fishery. Since Emergency Action is limited to six-months, any action can be evaluated over this relatively short interval to make sure it does not cause the TALs to be exceeded.

In terms of vessels possibly shifting effort to the SMA, the Council believes this is not a significant concern. Historically, the majority of vessels that fish in the NMA have not used their DAS allocations (in either area) because it is not profitable for them to do so. The lower monkfish trip limits in the SMA vessels make it even less economically feasible for NMA vessels, particularly trawlers, to use their DAS in the SMA. The Council's Monkfish PDT, however, stated that the potential for an effort shift is a valid concern but cannot be quantified or projected with any acceptable degree of precision. If the Council's request is approved, effort should be closely monitored to detect any large-scale shifts so that the action can be modified if necessary.

In approving the motion requesting Emergency Action, Council members considered public comment that the current Emergency Action rule would not achieve its intended purpose of alleviating the financial impact of 2013 groundfish quota cuts because the monkfish incidental limit applicable when a vessel is on a groundfish DAS constrains the ability of the fleet to land the full amount of the monkfish annual landings target.

If you have any questions, about this request, please contact me.

Sincerely,



Thomas A. Nies
Executive Director

cc: Dr. Christopher Moore, MAFMC Executive Director

