



January 15, 2016

Dr. Jacob Kritzer, Chair
New England Fishery Management Council
Scientific and Statistical Committee
50 Water Street, Mill 2
Newburyport, MA 01950

Dear Dr. Kritzer,

We are writing to offer the Scientific and Statistical Committee (SSC) a groundfish fishery perspective on the availability and utilization of witch flounder based upon our experience with Northeast Seafood Coalition (NSC) fishing members that operate out of the Northeast Fishery Sectors.

NSC members enrolled in the Northeast Fishery Sectors include fishing vessels that fish inshore as well as vessels that have a broader range which operate offshore and in multiple broad stock areas (BSAs). In terms of the witch flounder fishery, NSC members participate in the two key components that comprise of this fishery, the inshore Gulf of Maine and offshore Gulf of Maine / Georges Bank.

For NSC members and non-members, CPUE has remained high in all areas where witch flounder is an expected component of catch. Put another way, from a historical perspective the witch flounder fishery footprint within the overall stock area has not constricted and CPUE at the fringes remains dangerously high relative to the recent commercial ACLs and resulting individual and fleet allocations.

For the offshore fleet this is especially problematic because the fleet is already avoiding the areas within the footprint that are producing highest CPUEs of witch flounder because the 2013-2015 ACLs have presented a witch flounder avoidance scenario for the mobile gear fleet in recent years. For the inshore fleet, witch flounder continues to be readily available and comprises an ever increasing proportion of total catch due to dramatically reduced catch reductions of other inshore stocks.

For most of the fishery, witch flounder shares a fishery footprint that is similar to other important groundfish stocks as well as monkfish. Notably, american plaice, white hake, pollock and monkfish share huge overlaps of their respective fishery footprints to the extent that the catch of any of these species can be directly constrained by the ACL of one of the others. The extent to which the fishery is constrained is largely a function of the ability of the assessment to come close to correctly estimating the true state of nature for a particular stock among the mix of stocks that co-exist.

NSC has consistently stated that large ABC reductions that result from a truly smaller stock should not present an insurmountable fishery constraint. This is because the overall CPUE within the historical fishery footprint should decline proportionally to the reported stock status and fishermen should find it relatively easy to avoid any known concentrations.

Unfortunately, for many stocks in the groundfish complex this is not the case. Witch flounder is a prime example of a stock that suffers from a pessimistic assessment concurrent to completely contradictory signals in the fishery throughout the full footprint areas both inshore and offshore.

At the Groundfish Committee Meeting on Thursday January 14, 2016, catch projection results provided by the Plan Development Team shown to the Committee revealed an ABC of 521 metric tons in FY 2016 has a corresponding biomass of 3,234 metric tons. A constant quota approach using an ABC of 521 metric tons in FY 2017 would result in a corresponding biomass of 4,210 metric tons.

Alternatively, an ABC of 399 metric tons in FY 2016 has a corresponding biomass of 3,253 metric tons and a constant quota utilizing an ABC of 399 metric tons in FY 2017 results in a corresponding biomass of 4,342 metric tons.

NSC views the difference in these corresponding biomass values as insignificant and, thus, fully supports the Council's willingness to accept an ABC for witch flounder that is up to 521 metric tons.

To conclude, in this instance, there are far greater risks to the groundfish fishery than to the resource. With no correlating negative signals being generated by the commercial fishery the 2015 updated assessment included a substantial downward retrospective adjustment (approximately 50%). For this reason and recognizing there will be a benchmark assessment in 2016, NSC fully encourages the reconsideration of an ABC up to the OFL.

Sincerely,



Jackie Odell
Executive Director



Vito Giacalone
Policy Advisor, Board of Directors