



December 12, 2014

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

Re: Comments on the GOM haddock emergency action

Dear John,

The Northeast Seafood Coalition (NSC) submits the following comments for the emergency action for Gulf of Maine (GOM) haddock.

The NSC strongly believes it is essential to the future of the groundfish industry to revise the 2014 Annual Catch Limits for GOM haddock based on the Stock Assessment Review Committee for Gulf of Maine haddock (SARC 59, August 2014). For almost two years now, commercial fishing vessels fishing in the Gulf of Maine have been severely constrained by the low ACL adopted under Framework 50. The current ACL is based on the 2012 Updated Review for GOM haddock which incorporated a down-weighting of survey indices and which consequently concluded the GOM haddock stock was approaching a condition of being overfished. The past two fishing years have proven that conclusion to be incorrect and that the stock biomass is much greater. In fact, the large recreational catch alone in 2013 proved that the prior assessment was incorrect.

Although NSC is supportive of the emergency action to increase the GOM haddock ACL in 2014, it is important to note that this increase remains ultra conservative. Strong year classes continue to be down-weighted in this assessment and the mixing between the GOM haddock stock and the much larger Georges Bank haddock stock remains unaccounted for. Please recall and consider the letter NSC, along with the AFM and the GFCPF, submitted to the SSC on August 23, 2014 in which we highlighted our concerns that the Terms of Reference for the SARC 59 concerning mixing between the two stocks had not been adequately addressed.

Lastly, the potential benefits of the ACL increase for GOM haddock for the commercial fishery is largely negated by the recent implementation of the GOM Cod Emergency Action. Access to GOM haddock has been essentially eliminated through the area closures now in place by NMFS for GOM cod. Therefore, the increase in haddock ACL will have little economic benefits for commercial vessels most impacted by the GOM cod closures. GOM haddock fishing, especially inshore areas, is mid-February through April. The month of March indicates sparse evidence of cod in spawning condition and is historically a good month for haddock catches in the inshore fishing grounds. NMFS needs to remove the March closures for inshore vessels to have an opportunity to target other stocks such as GOM haddock with minimal impact on cod.

NSC appreciates the opportunity to comment on these important measures for our commercial groundfish members.

Sincerely,

A handwritten signature in blue ink that reads "Jackie Odell".

Jackie Odell, Executive Director