



August 28, 2015

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) with a groundfish fishery perspective on the low utilization of Georges Bank (GB) yellowtail in recent years in preparation for the Scientific and Statistical Committee's (SSC) discussion relating to the ABC for GB yellowtail in 2016-2017.

Although we are not aware of any analysis conducted to date that has evaluated the change in effort over time with respect to directed GB yellowtail trips, we do know that the reduction in ACLs for GB yellowtail that began in the mid-2000s has greatly impacted the number of participants in the fishery. From speaking with our members from New Bedford, the offshore fleet that targeted GB yellowtail has been reduced by roughly 75% over the past 7 or 8 years. Vessels have either tied-up, been sold, or have switched to other fisheries. To put this into perspective we conducted a cursory review of a roster of vessels that once contributed substantially to the directed yellowtail fishery on Georges Bank. Of the 60 vessels recalled from no earlier than 2006, only 15 vessels remain in the fishery today. Those 15 vessels no longer fish for yellowtail for a combination of compelling reasons:

1. When the Major Change model first hit the GB yellowtail assessment, pressure to reduce the ACL below 2,000 metric ton effectively eliminated the directed fishery which resulted in permanent loss of market. The market for yellowtail flounder has now become so fragile that even low volumes can return very low ex-vessel price on the fresh spot market.
2. The continuous downward direction of ACL caused individual Potential Sector Contributions (PSC) that were relatively high for historical GB yellowtail vessels, to result in very low Annual Catch Entitlements (ACE).
3. This caused a mass exodus from the fishery and left the permit holders with no other option than to lease their allocations through the sector system.
4. For the few remaining vessels who continued to be active they are faced with speculating on trying to lease GB yellowtail quota from multiple inactive fishermen in order to compile enough yellowtail for one directed trip. Many of the potential lessor

permit holders are trying to move their allocations in packages which makes collecting GB yellowtail quota even more onerous financially.

5. Once individual allocations (via sector internal distribution) dropped below the threshold that justifies directed fishing, the costs of leasing coupled with the loss of a reliable market price has the same effect as a fishery closure.

Again, from our cursory review, the 15 vessels that are still active from the 60 vessels we identified are only active because they were able refocus their fishing businesses onto haddock and deeper water fisheries of sole, dabs, monkfish or redfish.

Yellowtail, like many of our NE groundfish species, are spatially discreet in that their preferred habitat is a small percentage of the biological range of the stock.

For stocks like GB yellowtail flounder, there is a threshold where utility rates would increase once the ACL was increase to or above the level that would make it financially feasible to try to rebuild the market for yellowtail which will only happen once a regular supply reoccurred.

The PDT correctly noted that a substantial portion of the GB yellowtail historical fishery areas are restricted by the Northern windowpane flounder accountability measure (AM) which prohibits the use of flounder nets.

The windowpane AM requiring the exclusive use of the separator trawl coupled with the fact that the haddock fishery on Georges Bank has been occurring primarily on the western edge of the bank rather than the Southeast Parts, the groundfish fleet interaction with the GB yellowtail stock is extremely limited.

The important message we are trying to convey here is that utility rates in cases such as GB yellowtail are a very poor indicator of stock size for stocks that are spatially and temporally discreet and predictable.

We would therefore advise the SSC not to view recent catches from the commercial groundfish fleet as confirmation for low biomass and would urge the SSC to at a minimum retain status quo when considering the ABC for this stock. It is our hope that targeted research coupled with direct initiatives undertaken by the groundfish fishery in the near future can work to improve the biological knowledge and thus assessment for the GB yellowtail stock.

Sincerely,

Jackie Odell
Executive Director

Vito Giacalone
Policy Advisor, Board of Directors