NORTHEAST SEAFOOD COALITION

February 23, 2012

To the Editor:

Recent articles in the *Gloucester Daily Times* have suggested, incorrectly, that the Northeast Seafood Coalition (NSC) is an advocate for "catch shares" in the groundfish fishery, that NSC favors the interests of large boats, and that NSC is an advocate for catch shares precisely because catch shares favor the interests of large boats (see "Fish deputy ties cod loss to catch shares," 2/3/12). The NSC Board would like to take this opportunity to correct the record.

The NSC has never been an advocate for sectors (which NOAA – the National Atmospheric and Oceanic Administration – has characterized as "catch shares"). The NSC organized sectors only when it became clear that the Council had before it no other remotely tenable option for the 255 businesses that are members of the NSC. The NSC repeatedly has characterized the sectors it organized as "lifeboats" designed to save industry members from perishing in storms created by ten-year rebuilding requirements and constantly shifting assessment science. The NSC also has pointed out repeatedly that sectors do not meet statutory requirements for "limited access privilege programs," and NSC was instrumental in NOAA's acknowledgment of this crucial point. (NSC organized Northeast Fishery Sectors 2-13; each of the 12 sectors is an independent entity, but all members of the 12 sectors are members of the NSC.)

NSC fishing business members are small, local, and entrepreneurial. They own and operate small, medium, and large boats (30-50 feet, 50-75 feet, and 75-100 feet, respectively) and use all three principal gears in the groundfish fishery (trawl, gillnet, longline). NSC fishing business members fish from ports large and small in Maine, New Hampshire, Massachusetts, Connecticut, Rhode Island, New York, and New Jersey. Diversity in the groundfish industry was a founding tenet of the NSC and is a key operating principle. Small, medium, and large vessels each occupy key niches of the industry, and they together keep the industry as a whole operational. One without the others dooms the whole industry. The NSC works hard – and usually successfully – to forge solutions that work for the good of the whole industry. That is our reason for being. Solutions that work for the whole industry, moreover, are ones that support the long term health of the fishery resources on which the whole industry depends.

Sectors are a decidedly mixed bag. They were the only potentially viable option for most groundfish businesses, and yet they are a barely viable option. They bring some flexibility in fishing operations and they unshackle vessels from the clock. But, allocations (which, technically, are *not* allocations) were made through a formula which left many unable to fish without acquiring additional quota from others. The good that sectors brought – some

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flexibility and a release from the clock – applies to *all* vessels in sectors. The ill they brought – unworkable allocations for many – was not confined to vessels of any particular size, but was visited upon vessels of all sizes (and of all classes, gears, and locales).

The groundfish fishery faces extremely difficult challenges. Meeting these challenges requires the best, most accurate information possible. We thank you for this opportunity to correct the record on the Northeast Seafood Coalition.

Signed by the NSC Board of Directors,

John Bell Gloucester MA

Richard Canastra

Base, Inc., New Bedford MA

Vito Giacalone

F/V Jenny G, Gloucester MA

Christopher Brown

F/V Proud Mary, Point Judith RI

Richard Burgess Multiple vessel owner, Manchester MA

Raymond Canastra Base, Inc., New Bedford MA

Albert Cottone F/V Sabrina Maria, Gloucester MA
David Goethel F/V Ellen Diane, Hampton NH
James Hayward F/V Heidi & Elisabeth, Eliot ME

Felicio Lourenzo Multiple vessel owner, New Bedford MA William McCann F/V Pilgrim, F/V Shamrock, Wareham MA

Joseph Orlando F/V Padre Pio, Gloucester MA

Steven Parkes Fisheries Consultant, North Andover
Carlos Rafael Multiple vessel owner, New Bedford MA
Sarah P. Robinson, JD, SJD Critical Inquiries Research, Brookline MA

Vincenzo Russo F/V Miss Trish, Gloucester MA

Angela Sanfilippo The Gloucester Fishermen's Wives Assoc., Gloucester MA

Russell Sherman F/V Lady Jane, Gloucester MA

State Senator Bruce Tarr Gloucester MA

Michael Walsh Multiple vessel owner and captain, Boston MA

Stephen Welch F/V Holly & Abby, Scituate MA

Thomas Williams, Sr. F/V Heritage, F/V Tradition, Westerly Rhode Island