



Mid-Atlantic Fishery Management Council

800 North State Street, Suite 201, Dover, DE 19901-3910

Phone: 302-674-2331 | Toll Free: 877-446-2362 | FAX: 302-674-5399 | www.mafmc.org

Richard B. Robins, Jr., Chairman | Lee G. Anderson, Vice Chairman

Christopher M. Moore, Ph.D., Executive Director

M E M O R A N D U M

DATE: April 10, 2014
TO: Joint Spiny Dogfish Committee
FROM: Jim Armstrong
SUBJECT: Industry Comments on 2014-2015 Spiny Dogfish Possession Limits

Background

For the 2014 and 2015 fishing years, while the Councils agreed on the commercial quotas, the Mid-Atlantic Council recommended a 4,000 lb (status quo) possession limit and the New England Council recommended elimination of commercial possession limits. Under the Spiny Dogfish FMP, disagreement on a particular management measure is resolved by the NMFS Regional Administrator selecting an alternative that has not been rejected by both Councils. There is no trip limit alternative that has been rejected by both Councils, so any trip limit can be selected by the Regional Administrator. In order to assist NMFS in fully considering the likely operational and economic impacts of different possession limits, further information was needed from active and invested spiny dogfish fishery participants. This information will also be used for improving the description of economic and social impacts in the 2014-2015 Spiny Dogfish Specifications Environmental Assessment.

In order to achieve this, a public meeting aimed at gathering industry perspectives on commercial spiny dogfish possession limits was held at 7 p.m. April 8, 2014 via webinar. There were approximately 37 participants and 17 individuals contributed comments. A summary of the comments is provided here (Table 1) and will also be incorporated into the Council's Spiny Dogfish Specifications for the 2014 and 2015 fishing years.

In general, commenters were opposed to eliminating trip limits (15 of 17 comments). Most of these supported maintaining existing trip limits (9/15), increasing the trip limit modestly (3/15), or having state and vessel-specific flexibility in (4/15) trip limits. One commenter supported both current and vessel-specific trip limits. Two commenters were in support of eliminating federal trip limits.

Under current market constraints, the vessel price for spiny dogfish (~0.15/lb) is about 32% below the long term 2008-2012 average (~0.22/lb) and opposition to unlimited possession was generally based on the expectation that it would overwhelm market supply and drive the price down even further. There was also concern that the food market which is mostly supplied by the gillnet and hook fishery would not accept a lower quality product from large trawl catches. A common theme among these commenters was the need for further development of the market including a domestic market and for market stability. Support for elimination of the trip limit came from two New England Council members. One was primarily concerned about the vast number of dogfish discards at the current trip limit and the other thought the ASMFC would be better able to respond to the need to change the trip limits.

Table 1. Paraphrased comments from participants in the Spiny Dogfish Webinar that was held at 7 p.m. April 8, 2014.

Participant	Name	Affiliation	Trip Limit Recommendation	Comments
1	Terry Alexander	Fisherman, NE Council Member	Unlimited	A lot of boats with too many discards, sometimes thousands of pounds, need to be able to land them in order to build/improve market, also need to catch them because they are eating more valuable fish
2	Doug Feeney	Fisherman, Chatham	4,000	Trying to establish a viable food market for dogfish, high volume low value will negatively affect quality. Fertilizer market should be handled separately.
3	Ted Leganza	Fisherman, Chatham	4,000	Price has gone down as the trip limit has increased. Now getting same amount as we used to get for 2,000 lbs because the price is half of what it used to be. As trip limit goes up processors won't take fish as often and price goes down. Worried about how high volume fishery will affect market
4	James Fletcher	Commercial Organization, NC	State specific in southern states in EEZ, whatever is needed in northern region	If possession is unlimited then only a few boats will be able to participate in the fishery. Should have separate management measures for male and female spiny dogfish. Male fishery should be unlimited. Whatever is set needs to be in place for several years. Name change is needed "chip fish" to help develop market.
5	Chris Hickman	Fisherman, Hatteras	State specific	Haven't been able to harvest the NC quota at either 4,000 or 10,000 lbs. The market needs to be improved before supply increases dramatically. Unlimited possession has the potential to overload the market.

6	Ray Kane	Fisherman, Chatham	4,000	The market has changed a lot over the history of the fishery that pre-dates the FMP. Markets Were getting 0.33/lb at one point. We need to focus on sustainability of the fishery and unlimited possession will work against that. A different market for fertilizer will need to be managed differently. 4,000 lbs is probably too high.
7	Bonnie Brady	Commercial Organization, Long Island	Alternative scenarios for different vessels including cumulative trip limit	Need to be able to adjust as market conditions change and not just keep things as they are.
8	Kevin Wark	Fisherman, Barnegat Light	4,000	Need to move in incremental steps as market develops. Unlimited sends wrong message, creates unstable atmosphere. We'd like a bigger limit but we can't make any money until the market opens up. When it was wide open we fished ourselves out. We're wasting out time with unlimited under the current market.
9	Scott MacDonald	Fish Buyer, Virginia Beach	4,000	Reason we're not catching them is that there is no market. We need to develop markets. Until then we are asking for trouble and will have all the problems we had before if we go unlimited.
10	David Gelfman	Fisherman, Chatham	4,000	A lot of effort to catch the current trip limit. Larger trip limit will result in lower quality catch. Will pit small boats against large boats. The food market needs high quality product. It is currently a small boat fishery but that would change with a big trip limit increase.
11	Chawner Hurd	Organic Fertilizer Industry	4000 for food market	It is a shame that people are leaving the fishery and the small boats fishery should be preserved. Very interested in the idea of a separate fishery for the fertilizer trade and food trade.

12	John Whiteside	Processor Representative	5,000	Based on numbers in presentation, the number of boats and number of days, it works out to about 5,000 lb. There is likely not a perfect number. A small increase like this could be sustained by the market. At unlimited, the resource would likely not be sustainable and the quality of the product would decline which would affect price and market.
13	Peter Kendell	Fisherman, NE Council Member	Increase to 7,000	Largely inaudible comments. Increased poundage necessary to offset trip expenses and make trips worthwhile.
14	Claire Fitz-Gerald	Commercial Organization, MA	4,000	Need to focus on ways to ensure the quality of the product for the food market. Unlimited possession would work against that. Need to develop other markets such as the domestic food market. Processors are telling guys not to fish with the increase to 4,000, so the market is definitely not ready to handle increased supply at this time.
15	Ted Platz	Fisherman, RI	5,000	Agree with Kevin Wark. Need to go in incremental steps. Pushing supply should be done but at a reasonable level to optimize price and not flood market. In terms of food product vs fertilizer, handling and quality are not issues at 4,000 lbs. Need to land more product while being careful not to upset price structure.
16	Greg DiDomenico	Commercial Organization	4,000	Echo reasons already voiced, but would like to explore alternative trip limits for larger vessels - druggers while keeping gillnet trip limit at 4,000.
17	Dave Preble	Fisherman, NE Council Member	Unlimited	Don't want to micromanage the fishery. Don't want an unregulated fishery. The trip limits should be able to change quickly and the Commission can do that more quickly than the feds.