ASMFC / MAFMC

RE: Joint meeting on Summer Flounder Amendment

Please add these comments from the Virginia Commercial Summer Flounder Industry

C. Meade Amory
1. Permits and Latent Effort:

If it is the intention to reduce permit capacity because of perceived overcapacity than it should be pointed out that many states have taken steps to reduce latent effort. For example Virginia established limited entry over 20 years ago. These same states have very good quality data for landings with solid enforcement protocols and reliable reporting.

1A Status Quo: With a recommendation that the Council and Board direct the states to work to reduce Latent effort as it best applies to their management system. Each state has developed a good management system based on landings, gear types and other criteria that best suits their needs and therefore should be better suited to reduce latent effort at their level.

2. Commercial Allocation:

It must be stressed that in scoping and documents and every series of comments since the overwhelming majority supports status quo. Yet here we are 4 years later with 5 other options that have 10 sub-options.

I was not going to management meetings 25 years ago, but my father was, and while physically he is having a tough time, mentally he is very sharp and remembers the meetings and discussions. This was and has always been a mainly VA, NC & NJ fishery. Most of the states in the northern range were fishing for Yellowtail, black backs, grey sole, scup, etc... The consensus was reached to go with a state by state allocation based on historical landings. Nobody at the time disputed with any degree the landings data as most everyone understood that this was mostly a southern fleet fishery. The state by state allocation was pushed by northern states that didn’t want the southern fleet to catch the whole quota before the fish moved into their waters.

2A Status Quo is the best option –let’s be clear anything else is a grab for quota and moving toward anything else is taking away from the folks that have managed it well and played by the rules. The jobs and infrastructure that have developed and persisted the last 25 years should not be swept away because there was briefly an expansion of the stock abundance that has now diminished.

3. Safe Harbor:

This should be a simple situation where a boat needs to come into state waters for “bad Weather, Medical emergency, and/or serious equipment failure” The vessel only needs to ask for “Safe Harbor” if they have fish that might be illegal in that particular state. Safe Harbor is a temporary situation. If for some reason the vessel cannot continue on the original port they can ask for a transfer of quota. This is done on a state to state basis and has been happening for years with no problems. No new regulation are needed for something that has a set perimeter and is working well. Any incidents of fish being discard based on this issue are extremely rare and exaggerated to try misdirect this amendment.
3C: This is strictly a Temporary Safety Issue and is no way related to the landing or off-loading of fish. While it is important have as similar as possible guidelines for safe harbor each state has differences that should be taken in to consideration. Any discussion of landings is a state quota issue.

4. Landings Flexibility

* Quota flexibility already exists. Each State has the ability be flexible with their quota. It happens in many species and happens many times a year with summer flounder.

Landings flexibility is just another name for quota reallocation. There are long established communities in Virginia and North Carolina that have substantial investment in jobs and infrastructure based on the current state quota system. There are 25 + years of infrastructure and logistics in place based on the current system. This is 85% of the trawl fishery in Virginia and any loss of landing would be economically devastating. We do not have availability of multiple other species that other states have.

Any vessels that have purchased a state license knew very well what the landing requirements were when they purchased the license.

Remember only a small percentage of fisherman are asking for this. Most everyone associated with the commercial summer flounder trawl fishery are pleased with the current system. Accountability and enforcement are nearly impossible with any flexible landing options. Landings flexibility is a nightmare scenario for managers.

5. Commercial Data Collection Requirements and Protocols

5B: Require VMS: The better the data the better the management. Most vessels have this system in place already.

6. Discards and Bycatch:

Gear modifications such as mesh design are the best tool available for addressing bycatch and discard problems. However, trip limits are a leading factor of regulatory discards.