



THE BILLFISH FOUNDATION
CONSERVATION THROUGH RESEARCH, EDUCATION AND ADVOCACY

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South Atlantic Fishery Management Council
Dolphin and Wahoo - Amendment 10

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Transmitted Via Portal

Dear Council/Committee Members:

The Billfish Foundation (TBF) is the leading, science-based, sportfishing conservation organization that advances the conservation and responsible management of billfish and tunas. Conserving billfish and tunas includes conserving their Important prey species, bullet and frigate mackerel, within the ecosystem where they interact. Billfish and tuna are prized targeted species for the recreational fishing community, a fishery dependent upon a healthy status and availability of bullet mackerel. A fishery who's well-being directly generates social and economic benefits to communities.

The predator prey relationship existing between Atlantic marlin and bullet mackerel and the competing relationship between marlin and wahoo chasing bullet mackerel are clear examples of ecosystem interaction where conservation is crucial. Part of these interactions often become apparent when an angler targets marlin and catches a wahoo because the two species were chasing the same prey mackerel. Within the NOAA/NMFS Ecosystem-Based Fishery Management Policy (2/5/2018) it states consideration be given to interacting elements within an ecosystem to support ecosystem functions, fishery sustainability and the well-being of fishing communities, social stability and economic benefits. <https://www.fisheries.noaa.gov/resource/document/ecosystem-based-fisheries-management-policy>. If bullet mackerel becomes overfished due to a failure to provide protections now, the status of Atlantic blue marlin can further be negatively impacted. The stock is already down by between 31% - 38%, based on the recent stock assessment. Taking action now to provide some protection for bullet and frigate mackerel through Option 3, in the current Scoping Document for Dolphin and Wahoo, will be consistent with the Ecosystem-Based Fishery Management Policy's positive goals of ecosystem functions, conservation of marlin and mackerel that help support fisheries and coastal communities.

With no current U.S. large-scale commercial or recreational fisheries targeting bullet or frigate mackerels, an excellent opportunity now exists for the Council, through Option 3, to help protect the species, insure ecosystem functioning and support fisheries. Action now can prevent a seriously challenging management problem if the mackerel are allowed to become overfished; it is harder to curb overfishing once it has been allowed to occur.

Thank you for the opportunity to share our perspective and recommendation. We encourage the Council members to protect bullet and frigate mackerel now in the Amendment to the Dolphin and Wahoo Fishery Management Plan, Option 3. Waiting will complicate the issue and do harm to the species, the fisheries and the related communities.

Respectfully,

Ellen Peel, President