



**THE BILLFISH FOUNDATION**  
CONSERVATION THROUGH RESEARCH, EDUCATION AND ADVOCACY

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Highly Migratory Species Division  
1315 East West Highway  
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Attn: Craig Cockrell

Ref: Issuance of Exempted  
Fishing Permits - Atlantic HMS  
2013 - Transmitted Via Email  
[NMFS.HMSEFP.2013@noaa.gov](mailto:NMFS.HMSEFP.2013@noaa.gov)

Thank you for the opportunity to respond to the announcement that the NMFS will be considering issuance of Exempted Fishing Permits (EFP) for anticipated projects during 2013. The Billfish Foundation (TBF) opposes issuance of an EFP for the stated purpose of "research" that would now allow commercial pelagic longline vessels to fish in the Charleston Bump and Florida East Coast marine conservation zones to "investigate bycatch hotspots" or for bluefin tuna life history research. Though not included in this notice we also would oppose any such research in the Gulf of Mexico zone closed to pelagic longline gear.

The pelagic longline closed zones were established to reduce bycatch in the area because it was a bycatch hotspot of "overfished and protected species", which included blue marlin, white marlin, sailfish, juvenile swordfish and sea turtles." The status of all these species, except for swordfish, remains the same. Swordfish have recovered, which attests to the success, in part, of the closed zones. Allowing pelagic longline gear back into these zones would certainly establish it once again as a "bycatch hotspot" that needs to remain closed to the gear.

The proposal does not provide enough specifics for a true evaluation of the impacts of and need for research using pelagic longline gear in the conservation zones. There is no statement as to the purpose and intent of such research. What question will the work address? Who will conduct the research and what are the qualifications and experience of the investigators? Earlier research in the zone produced few clear results and raised many questions as to its execution. The last proposal for an EFP allowing the use of longlines in this closed area was rejected by the SAFMC and the state of Florida. In light of the need for

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EFP

greater scrutiny by the FMC, the state of Florida and the public issuing such an EFP would be contrary to good governance and public policy.

Again thank you for the opportunity to comment. We look forward to working with you during the continued amendment process of the HMS FMP.

Respectfully,

A handwritten signature in cursive script that reads "Ellen Peel".

Ellen M. Peel  
President