



THE BILLFISH FOUNDATION
CONSERVATION THROUGH RESEARCH, EDUCATION AND ADVOCACY
5100 N. Federal Hwy., Suite 200 • Fort Lauderdale, Florida 33308
(954) 938-0150 • (800) 438-8247 • Fax (954) 938-5311

Call to ACTION

September 19, 2019

Ref: NOAA-NMFS-2018-0035
Weak Hooks – Gulf of Mexico
Gear Restricted Areas – NJ, NC
& Gulf of MX

To: Officers of Big Game Fishing Clubs, Tournament Directors, Marina Operators, Yacht Manufacturing/Sales/Repairs, Related Businesses, etc

The National Marine Fisheries Service (NMFS) is pushing through three initiatives to authorize pelagic longline gear to fish in longstanding closed zones and gear restricted areas. Their goal is to reinvigorate the U.S. pelagic longline fishery and to simplify management actions. Nothing in the federal initiatives includes a word of concern or plan to advance recovery of Atlantic marlin or other species nor to support the recreational fishing industry. The documents reflect a strong bias in favor of commercial fishing. TBF has submitted comments to the two previous initiatives.

In one previous initiatives, the government questioned whether the pelagic longline closed zones are the reason why the commercial fleet failed to catch its quota and did that increase the U.S. seafood trade deficit. Prior to the closures the U.S. swordfish pelagic longline fleet caught 80% of the undersized juvenile swordfish landed in the Atlantic and all adjacent waters until the international management organization agreed the practice had to stop, it did and they failed to fill their quota, wonder why? The overwhelming majority of seafood consumed in the U.S. is imported, so landing every swordfish and exporting would not dent the seafood trade deficit. Another proposal aims to authorize allowing Atlantic permitted pelagic longline vessels to fish in the Gulf, we stringently opposed.

TBF has drafted comments for submission on or before Sept. 30 in response to the current federal initiative – Weak Hooks & Gear Restricted Areas – Bluefin Tuna. I am asking your permission to include your name on our list of sportfishing interests who share our position on the government initiative; we don't have time to collect all signatures. If you prefer to write you own comments and submit that is awesome, please let me know if you wish to be listed on TBF's letter ASAP.

This is an abbreviated version of TBF comments: oppose cutting in half the required use by pelagic longline vessels of weak hooks and we oppose deleting or modifying pelagic longline Gear Restricted Areas. Changes will result in increases in billfish bycatch mortality and causing fewer fish to be available for anglers in tournaments; economic negatives will follow. To submit comments: [Go to www.regulations.gov/#!docketDetail;D=NOAA-NMFS-2018-0035](http://www.regulations.gov/#!docketDetail;D=NOAA-NMFS-2018-0035), click the "Comment Now" icon, complete the required fields, and enter or attach your comments.

Thank you for your consideration,

President, TBF