



THE BILLFISH FOUNDATION

CONSERVATION THROUGH RESEARCH, EDUCATION AND ADVOCACY

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NOAA/NMFS Fisheries

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The Billfish Foundation (TBF) appreciates this opportunity to submit comments on the proposed rule to modify North Atlantic swordfish and shark retention limits and in-season adjustments for the Caribbean Commercial Small Boat (CCSB) swordfish fishery within waters off Puerto Rico and U.S. Virgin Islands, and for the Charter/Headboat and the Swordfish General Commercial fisheries in the NW Atlantic Ocean (Gulf of Mexico and Caribbean). The fact that North Atlantic Swordfish stocks have recovered and U.S. vessels have failed to land quota allocations, the desire by managers to authorize an increase in retention limits in the identified areas, not including Florida's or Charleston's east coast closed zones, is understood again this year.

The proposed action, Alternative B2, to increase swordfish retention levels up to six (6) fish per vessel per trip within each of the three fisheries appears reasonable again this year, but with three concerns for the CCSB fishery. One, with the vessel size limited to less than 45 feet in length, safety could become an issue if the carrying capacity of a vessel is not adequate to transport six large swordfish in varying seas. Vessel operators may feel pressured to take "all that is authorized regardless of safety issues," which could result in harm to the individual(s) on board and to the vessel. Two, a vessel that is under-size for safely transporting six large swordfish in varying seas may be tempted to adopt a practice of transferring fish to other vessels, permitted and not permitted, just to take the authorized max number of swordfish. Transferring fish could encourage excessive landings and reduce prices in the local markets, causing economic harm. Though maintaining the vessels length at less than forty-five feet helps maintain the fishery as a true artisanal fishery. Three, with the landing limit authorized per trip, it is possible in some situations a vessel could make two trips in a day and land twelve swordfish. Perhaps the limit should be per day.

Thank you again for the opportunity to comment.

Ellen Peel
President