



THE BILLFISH FOUNDATION
CONSERVATION THROUGH RESEARCH, EDUCATION AND ADVOCACY

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Randy Blankinship
Division Chief
Office of Sustainable Fisheries
Highly Migratory Species Management Division
Silver Springs, MD

Transmitted Via Email
NOAA-NMFS02019-0042

Dear Randy,

The Billfish Foundation (TBF) appreciates this opportunity to submit comments on the Proposed Rule in Draft Amendment 13 to the Consolidated Atlantic FMP for Highly Migratory Species.

The Draft Amendment makes clear that a primary goal is to improve U. S. management of Atlantic bluefin tuna in ways that results in landing the full U.S baseline quota share:

an increase in landings “could result in catching a higher percentage of baseline US quota....and reduce potential reallocation to other nations”.

The Draft text further notes that a Category’s catch history is important for determining changes in allocations, which bodes well for the Angling Category. Each year the allocated Trophy-size bluefin allocation to the Angling Category, including the Gulf of Mexico “incidental” fishery, is landed by anglers. This too bodes well for the Angling Category to receive more bluefin tonnage, which would assist the U.S. in catching a higher percentage of its baseline quota.

In 2020, 79.1 metric tons or 174,385.442 pounds of the U.S. allocation was not landed. Had the Angling Category been allocated more tonnage, the failing of the U.S. to land its base quota would have been less.

Yet it is the Angling Category that is selected two times for criticism in the Draft,

“an increase in the Trophy Bluefin quota to the Angling Category, which is an increased opportunity to incidentally catch one, “could increase the incentive to sell them.””

At the same time, each year the agency accommodates the Longline Category with tonnage transfers from the Reserve Category and allows the leasing of additional tonnage from the Purse Seine Category to cover longline excesses. Yet the Longline Category is not criticized for possibly “high-grading” landed bluefin or possibly being tempted to take acts not consistent with the FMP and the U.S. management goals. Clearly an agency bias exists.

Since the Purse Seine Category has not landed Atlantic bluefin since 2015 and very few tons in years just prior, that Category's bluefin tonnage should be allocated to other Categories. The reallocation should not just be to directed bluefin fisheries, but also to the Angling Category, including to the Gulf of Mexico's "incidental" Angling fishery. While the Gulf is documented to be a bluefin spawning ground, research has raised questions of the possibility of another spawning ground in the Central Atlantic.

Further adding to the restraints on U.S. bluefin fisheries is the artificial line that ICCAT created, resulting in an Eastern Atlantic bluefin stock and a Western Atlantic bluefin stock for management purposes. The question remains whether Atlantic bluefin stock structure is actually one Atlantic-wide. With the disproportionate number of small bluefin in the Eastern Atlantic increasing in abundance in some years with little increases in the west, it is speculated that specific age classes and sizes of Atlantic bluefin move to different areas within the Atlantic during different life stages.

Atlantic bluefin tuna uncertainties are leveraged against the Western Atlantic bluefin fisheries, especially the Angling Category as bluefin abundance increases in the Eastern Atlantic and benefits the non-U.S. fisheries in the region. The Angling Category in the Gulf of Mexico is further restrained by the requirement that bluefin must be "incidentally caught" even though uncertainties exist as to other spawning sites and whether there is only one Atlantic bluefin stock. The only modification that should be made to the Angling Category for trophy-size bluefin, in all 3 areas, is an increase in tonnage.

A portion of the unused (landed) Purse Seine Category bluefin allocation should also be reallocated to the Angling Category for the small to medium large bluefin, primarily off the East Coast of the U.S. If needed, a portion of the tonnage to the Angling Category for bluefin under trophy-size could come from the General Category rod and reel fishery.

Authorizing any Atlantic-permitted pelagic longline vessels to also fish in the Gulf of Mexico should not be allowed, an increase in high-grading could result. Allowing additional longline vessels to land more bluefin in the Gulf would be taking more from the Angling Category, bluefin anglers could land. Angling gear is far more selective than pelagic longline gear and can assist the U.S. in increasing the landing of its base quota.

The Angling Category fisheries generate more economic benefits into the U.S. commerce than from the non-net commercial fisheries. Recreational fishing is a traditional U.S. industry that remains important to the nation and its economy.

No changes should be made to the Harpoon Category, authorizing the gear for charter/headboats still makes no sense, as was decided in the previous Amendment to the FMP.

NOAA/NMFS HMS fishery management reflects a bias against the Angling Category while the pelagic Longline Category is always favored.

Sincerely,



Ellen Peel
President