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The 2011 specifications for the Atlantic Bluefin tuna fishery will lead to the lowest ever quotas for commercial and recreational bluefin tuna fishermen mainly because the longline fleet is responsible for large levels of dead discards of bluefin tuna. The current management system allows for the open ended accumulation of longline dead discards. NMFS HMS has accounted for these discards in the past by deducting them from other underutilized categories and roll over quotas. The new 2011 specification does little to limit or control longline discards. In fact, under the current system, longline fishermen are rewarded for discards and are not accountable at all. NOAA "math" simply reduces next year's quota to all commercial and recreational fishermen based on the previous year's longline dead discard estimate. This year, the bluefin tuna longline dead discard estimate is 160 tons, (most dead bluefin are between 70 and 85 inches) or approximately 1,000 to 1,500 individuals. Do to reduced fishing quotas and improved enforcement in the Eastern Atlantic and Mediterranean fisheries, and as our own Western Atlantic stock rebuilds, the incidental interaction between bluefin tunas and the longline fleet will continue to increase. As a result numbers of dead discards will increase. If left unchecked, this industrial fishing fleet will continue to cause reduced quotas for our artisanal commercial and recreational fishermen. Please submit an electronic comment to NOAA by following instructions on the ABTA web under "Current Actions". www.theabta.com To find out more about this rule go to http://www.nmfs.noaa.gov/sfa/hms/breaking_news.htm and review the March 11, 2011 entry (NMFS Proposes Atlantic Bluefin Tuna Quotas and Atlantic Tuna Fisheries Management Measures, Draft Environmental Assessment, Federal Register Notice March 11, 2011).