



ABTA

"PROTECTING YOUR FISHERY"

THE AMERICAN BLUEFIN TUNA ASSOCIATION
PO BOX 447
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WWW.THEABTA.COM

May 5, 2009

Margo Schulze-Haugen, Chief
HMS Division
NOAA/NMFS/SF1
1315 East West Highway
Silver Spring, MD 20910

Dear Margo:

The American Bluefin Tuna Association (ABTA) has been formed recently with one overriding objective: to protect the historical share of the US bluefin quota of western Atlantic ICCAT allocations and to hold accountable NOAA/NMFS and others responsible for utilization of the quota and protection of our varied bluefin fisheries for existing and future generations of American tuna fishermen. In times when our valuable quota is under challenge, as it is critically under siege today, we expect extraordinary action and measures by NMFS and our Washington representatives to do whatever is necessary to protect our fisheries, the tens of millions of dollars of economic value and thousands of jobs flowing from the fishery and support industries from Maine to Texas.

The ABTA participated substantially in the development of the March 2009 letter to 18 US Senators requesting intervention to fix shortcomings in the current NOAA/NMFS international and domestic policy and decision making processes leading to the current dire situation where major amounts of our bluefin and swordfish quota have been transferred to other countries. All of these transfers were to countries prosecuting their HMS fisheries with nowhere near the US comprehensive conservation programs in place protecting the targeted species and other living marine resources.

At the February 18-19 NMFS Highly Migratory Species Advisory Panel in Silver Spring, MD and at the public hearing in Gloucester, MA., several ABTA proposals were advanced to allow a more reasonable opportunity for US fishermen to catch our quota and are again summarized here. This is our formal request that your office begin analysis and preparation of an emergency regulatory rulemaking to implement applicable components of the following necessary changes to existing unilateral US regulations beyond the ICCAT agreements.

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- 1) Allow the current 3 fish per day bag limit on the bluefin tuna General category to apply to each day of a multiple-day offshore fishing trip. Schools of giant bluefin tuna are increasingly limited to offshore areas that cannot be accessed on day trips.
- 2) Reduce the minimum size for commercial sale of bluefin tuna to 65 inches, a size still substantially above the ICCAT minimum practiced by all countries other than the U.S.
- 3) Allow charter boats to participate in both the General and Angling categories for bluefin tuna on the same fishing trip.
- 4) Modestly revise the current incidental catch limit on bluefin tuna in the pelagic longline fleet to convert dead discards to landings. Allowing U.S. pelagic longline fishermen to land instead of discard one or two more bluefin tuna per trip (which are counted against the US quota) can make the difference between profit and loss-- bankruptcy and survival. It can also provide an incentive for swordfish vessel owners to make more trips and catch more of the unused U.S. swordfish quota.
- 5) Allow year round fishing as necessary by all bluefin tuna categories until their respective quotas are filled.
- 6) Allow expedited research by longline vessels in selected closed areas, or portions thereof, using circle hooks and other proven bycatch-reducing fishing methods, training, and tools.

We believe that ABTA recommendations #1, 3 and 5 could be most expeditiously implemented with minimal analysis and could be in place for this fishing season. We stand ready to provide additional clarification if necessary on any of the above modest changes to the current rules to allow a reasonable opportunity to catch more of the US quota and consistent with our ICCAT responsibilities.

Thank you in advance and we look forward to hearing from you regarding possible time frames for the changes requested above.

Sincerely,

Ralph Pratt
Executive Board Member

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