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CCA Positions and Justifications

Mid-Atlantic Council Unmanaged Forage Fish Omnibus Amendment

Public comment ending 6/17/ 2016

Background and Timing:

The public comment period for the Mid-Atlantic Fishery Management Council's (MAFMC) Unmanaged Forage Fish Omnibus Amendment is under way.

The Goal of the amendment is: ***“To prohibit the development of new and expansion of existing directed commercial fisheries on unmanaged forage species in Mid-Atlantic Federal waters until the Council has had an adequate opportunity to both assess the scientific information relating to any new or expanded directed fisheries and consider potential impacts to existing fisheries, fishing communities, and the marine ecosystem.”***

In August 2016, the MAFMC will review public comment on the alternatives they have developed. This action should protect the marine food web in Mid-Atlantic waters, and ensure the conservation of many forage species.

Definition:

Unmanaged forage species are ***“those which are not currently managed in any way by the Mid-Atlantic, New England, or South Atlantic Fishery Management Councils, or by the ASMFC.”***

The MAFMC has proposed the following list of orders/families/species for protection: sand lances, anchovies, sardines, chub mackerel, false albacore, bullet mackerel, frigate mackerel, herrings, silversides, halfbeaks, greeneyes, pearlsides, lanternfishes, squids, cuttlefish, octopods, Atlantic saury, cusk eels, krill, copepods, amphipods, and all other species under one inch as adults.

Public Comment:

The MAFMC is taking public comment **through June 17, 2016**. Details on how to comment via mail, email and at public hearings, along with the list of species:

<http://www.mafmc.org/newsfeed/2016/unmanaged-forage-public-hearings>.

Talking Points:

- The Mid-Atlantic Fishery Management Council (MAFMC) should be commended for their effort to manage forage fish species in a forward thinking way. Forage fish are an important part any marine ecosystem, moving energy from the plankton they eat to the larger predators that eat them. Managing these species carefully in the U.S. Atlantic will help sustain the structure of the ecosystem, as well as ensure healthy managed fisheries for forage and predator species.
- All of these species on the list (above) deserve protection under this amendment. Public comments can make the difference between species being included or left out. Explain the importance of particular species to you personally, your community, and your fishing experiences.
- Recreational fishing is an important economic driver to coastal communities in the Mid-Atlantic region. Protecting unmanaged forage species from large scale fishing will help keep the regional ecosystem in tact, and provide for abundant numbers of the predatory species anglers pursue.
- There is limited information on most of the species recommended for protections through this amendment. When data is not available, large-scale fishing should be prohibited until science and management are in place to make sure fishing levels allow for sustainability in the ecosystem. It is essential to understand impacts before directed fishing is allowed to occur.
- Under current regulations, a fishery could open on any unmanaged forage species with no assessment of the impacts on the ecosystem or economy. These species are at risk from the growing demand for fish oil, feed for livestock and aquaculture, and bait, and there are currently no regulations to prevent industrial fishing. Boats that could easily start targeting these fish can pull in hundreds of thousands of pounds in one haul. A significant fishery could develop very quickly with completely unknown impacts to the species' own population, the ecosystem, and the economy relying on sustainable fishing.
- The economic impact of Recreational fishing is greatest when a large abundance of forage species and predators exist in a region for the longest period possible. This action will ensure that fisheries managers can make sound decisions on the development of and expansion of forage fisheries, while limiting the unintended consequences on other predator based fisheries.
- The MAFMC has developed wide range of alternatives. CCA supports the following alternatives:

1. **Inclusion of the Council's full list of Ecosystem Component Species as listed in the PHD:**

- **Species:** *Scomberesox saurus* (Atlantic saury), *Euthynnus alletteratus* (false albacore), *Auxis thazard* (frigate mackerel), and *Auxis rochei* (bullet mackerel)
- **Families:** *Engraulidae* (anchovies), *Argentinidae* (argentines), *Atherinopsidae* (silversides), *Ammodytidae* (sand lances), *Sternoptychidae* (pearlsides, marine hatchetfishes), *Chlorophthalmidae* (greeneyes), *Myctophidae* (lanternfish), *Clupeidae* (herrings, shads, sardines, mullets), *Moronidae* (temperate basses), and *Hemiramphidae* (halfbeaks),
- **Orders:** *Ophidiiformes* (cusk eels).
- **Groups:**
 - **Copepods, krill, amphipods, and other species under 1 inch as adults:** including the families of *Calanidae* (copepods) and *Euphausiidae* (euphausid krill), the orders: *Amphipoda* (amphipods) and *Isopoda* (isopods), and the class *Ostracoda* (ostracods).
 - **Pelagic molluscs** including the families: *Ommastrephidae* (arrow squid, all EXCEPT sharptail shortfin squid), *Loliginidae* (pencil squids), *Sepiolidae* (bobtail squids), *Cranchiidae* (glass squid), and *Sepiidae* (cuttlefish), and the orders: *Octopods* (octopus), *Gymnosomata* (sea angels), and *Thecosomata* (sea butterflies).

Justification:

- The continued inclusion of false albacore are of the utmost importance to the recreational fishing community. False albacore should be included by this action until further protections are considered for these species through future council action. False albacore, frigate mackerel, and bullet mackerel are an important part of the regional food web as well.
- Diet data does not capture a record of the forage role of false albacore, frigate, bullet mackerel because of the limited number of large pelagic predators that are sampled, and the inability to accurately identify silvery fish parts once consumed by predators. Not all forage is eaten whole, especially when consumed by toothy predators like bluefish.
- We recognize that further management of HMS species like false albacore..et al. may be a future option for the Council to consider, but urge The Council to take this opportunity to protect these species now, instead of using limited staff resources to start another management action.

2. **Alternative 2B:** Designate unmanaged forage as Ecosystem Component Species and implement an incidental possession limit, with a 1700-pound total cap and a 1500-pound cap on individual species.

Justification:

- Incidental possession limits were derived through conversations at the Council, Committee, and AP level and represent a level of catch that will not burden already existing fisheries which interact with the species on the list, and are consistent with the Council's intent to prevent the development of new fisheries, or expansion of existing.

3. Alternative 3Aii:

- Manage chub mackerel as an Ecosystem Component Species, and enforce an incidental possession limit after an annual fishery-wide landings limit is met. The landing limit should be based on a 10-year average of landings, until further information about the roll chub play in the regional ecosystem, and biological data guides future changes of landing limits.
- The incidental limit should not exceed 10k pounds.

Justification: Chub mackerel abundance in the Mid-Atlantic Canyons coincide with a high abundance of predators which are the foundation of Mid-Atlantic large pelagic predator based offshore fisheries. The importance of chub mackerel to large pelagic predators is understood by those who fish the region, but difficult to quantify.

- A large level of managed forage species are harvested in the region at this time, and harvest levels are set based on single species assessments. Caution should be used when setting the levels of chub mackerel catch to ensure that the stability of the ecosystem is considered.

4. Alternative 4Cii:

-For the development new fisheries and/or expansion of existing fisheries, the Council should develop a new policy for Council review of EFP applications.

5. Alternative 5B:

-Requiring commercial fishing vessels to obtain a GARFO permit in order to possess any species designated as Ecosystem Component Species in the amendment.

6. Alternative 5Dii: Define the southern boundary at Cape Hatteras.

Justification:

- Cape Hatteras acts as a logical geographical and biological boundary, making it a more logical choice for this action rather than the NC/VA boundary.

7. Alternatives 5E i-iv: Framework able items

- List of EC Species
- Possession limits and landing limits
- Spatial and seasonal closures
- Recreational fishing regulations

Justification:

- By making the 4 items above framework able the Council can make future changes as necessary to stay within the intended scope of this action
- 5Ei: The list of species was determined after a long and thorough process. The EFP process should be utilized for future changes to the list of species.