



International Game Fish Association Fishing Hall of Fame & Museum

300 Gulf Stream Way, Dania Beach, Florida, 33004 U.S.A.

Phone: (954) 927-2628 • Fax: (954) 924-4299 • Museum Fax (954) 924-4220

January 30, 2017

Margo Schulze-Haugen
Highly Migratory Species Management Division (F/SF1)
National Marine Fisheries Service
1315 East-West Highway, Silver Spring, MD 20910

Dear Margo,

Thank you for providing the International Game Fish Association (IGFA) opportunity to comment on the EFP application that would allow pelagic longline (PLL) research in the northern portion of the East Florida Coast (EFC) PLL Closed Area.

IGFA acknowledges that the United States PLL fleet has undergone significant changes (circle hooks, IBQs, etc.) since the closed area was implemented in 2001. As such, we understand the National Marine Fisheries Service's (NMFS) desire to gain insight as to what impacts the retooled PLL fishery would have on this closed area.

However, while we believe that the experimental design of the proposed research is sound, we have great concern over the disposition and amount of regulatory bycatch that the study is projected to incur. According to the Draft Environmental Assessment issued by NMFS, if the EFP is approved and research is conducted for the three years requested, an additional 5,499 undersized swordfish, 759 billfish and 6,135 sharks that are prohibited from retention will be killed over and above what would take place in the PLL fishery if the EFP was not issued.

One of the primary reasons that the EFC PLL Closed Area was implemented in 2001 was to mitigate high bycatch of undersized swordfish, which were in a depleted state at the time. While we are now fortunate to have a rebuilt north Atlantic swordfish stock that is neither overfished or experiencing overfishing, IGFA believes that the projected amount of undersized swordfish bycatch mortality from the EFP is a step backwards from the success that was achieved in implementing the EFC PLL Closed Area.

We are also concerned with projected blue marlin and sailfish bycatch. Blue marlin are currently overfished and experiencing overfishing and even a modest increase in bycatch mortality from the EFP is not acceptable to IGFA and its members. Sailfish represent the highest projected billfish bycatch (424 fish annually) from the proposed EFP. IGFA would like to emphasize that the results of the 2016 western Atlantic sailfish stock assessment are equivocal.

The International Game Fish Association is a not-for-profit organization committed to the conservation of game fish and the promotion of responsible, ethical angling practices through science, education, rule making and record keeping.

Email: HQ@igfa.org • Website: www.igfa.org

While the assessment reports that it is “not likely” that the stock is overfished or experiencing overfishing, the ICCAT Standing Committee on Research and Statistics has stated that: “Both the eastern and western sailfish stocks may have been reduced to stock sizes below BMSY”.

The IGFA is cognizant that the US continues to struggle to fully capture its ICCAT swordfish quota and that there are concerns that quota underage may be reallocated to other countries who’s PLL fleets do not fish by the same conservation standards as ours. Nevertheless, we do not feel that this international issue justifies compromising the conservation benefits gained from implementing the EFC PLL Closed Area and potentially jeopardizing our domestic fisheries.

Sincerely,

A handwritten signature in black ink, appearing to be 'J. Schratwieser', with a long horizontal stroke extending to the right.

Jason Schratwieser
IGFA Conservation Director