March 15, 2013

Rebecca Blank
Acting Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, D.C. 20230

Re: Highly Migratory Species Amendment 7

Dear Acting Secretary Blank:

The American Bluefin Tuna Association, the International Game Fish Association, and the Pew Charitable Trusts are working together to encourage the National Oceanic and Atmospheric Administration's Fisheries Service (NOAA Fisheries) to take action to protect Atlantic bluefin tuna. Recently we have sponsored a series of Metro ads highlighting the opportunity before NOAA Fisheries to significantly improve the health of these magnificent fish. To provide more specifics on the actions that we believe will ensure the long-term viability of Atlantic bluefin and the fishing communities that depend on healthy numbers of these fish, we have agreed to a common set of policy outcomes for new bluefin tuna regulations currently under development by NOAA Fisheries. The following outlines what our organizations would like addressed in Amendment 7 to the Highly Migratory Species Fishery Management Plan.

Protect bluefin in spawning areas and other areas of high pelagic longline interaction

Bluefin are known to spawn in the Gulf of Mexico each spring. Since 1982, the U.S. has prohibited directed fishing for bluefin in the Gulf in accordance with international law, but there remains significant mortality that results from the incidental catch or bycatch of bluefin on pelagic longline fishing gear used to target yellowfin tuna and swordfish; both landings and discards. NOAA Fisheries should close pelagic longline fishing and promote switching this fishery to more selective alternative fishing gears while bluefin are in the Gulf to spawn. In addition, NOAA Fisheries should give serious consideration to closing other similar areas where bluefin experience high interactions with pelagic longline gear and may be spawning.

Maintain the current quota allocations

The current bluefin category quota allocations established in the 1999 Fishery Management Plan for Atlantic Tunas, Swordfish, and Sharks should be maintained. Providing more bluefin quota (above 8.1%) as incidental catch in the pelagic longline fishery would exacerbate the bycatch problem in the pelagic longline fishery and reduce fishing opportunities for directed fishermen.

Create a bluefin bycatch cap for the pelagic longline fishing fleet

To keep the pelagic longline fishery from exceeding its quota and provide sufficient incentive to the fleet to reduce bluefin interactions, NOAA Fisheries should adopt a bluefin bycatch cap that would result in closure of the longline fishery if reached. The pelagic longline category has exceeded at least one of its

regional sub quota allocations by up to 139% in four of the last five years, and that is before discards are included. This jeopardizes the health of Atlantic bluefin and could reduce fishing opportunities for the other categories, while making the U.S. vulnerable to inadvertently exceeding its quota designated by the International Commission for the Conservation of Atlantic Tunas.

Require pelagic longline fishermen to retain all bluefin

In conjunction with the bluefin bycatch cap and in order to eliminate the chance of unreported post-release mortality and provide additional motivation to avoid encounters with bluefin, NOAA Fisheries should require that pelagic longline fishermen should retain all legal-sized bluefin they catch. In addition, the current target catch requirements should be eliminated. This will provide the best data for quota tracking and stock assessment and eliminate the need for the controversial extrapolation of dead discards (except for fish encountered below the minimum size).

Require 100% observer coverage on pelagic longline fishing vessels or equivalent electronic monitoring

To ensure effective implementation of the bluefin bycatch cap, NOAA Fisheries should require 100% observer coverage, either human or electronic, on all pelagic longline fishing vessels.

Require real time reporting of pelagic longline catch data

NOAA Fisheries should require daily reporting of bluefin tuna interactions by the pelagic longline fishery via the newly mandated e-MTU vessel monitoring systems to enable timely monitoring and enforcement of the bluefin bycatch cap.

This suite of reforms of bluefin tuna management will drastically reduce the waste of this fish along the Atlantic coast and protect it on its spawning grounds, leading to a healthier population which will benefit coastal communities from New England to the Gulf of Mexico. Achieving healthy bluefin tuna populations is of the utmost concern to both fishermen and conservationists and we would welcome the opportunity to discuss our recommendations in more detail with you and others in the Department of Commerce, NOAA, and NOAA Fisheries.

Sincerely,

Rich Ruais
Executive Director, American Bluefin Tuna Association

Rob Kramer
President, International Game Fish Association

Lee Crockett
Director, U.S. Fisheries Campaigns, The Pew Charitable Trusts