



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 8, 2014

Thomas Warren,
Highly Migratory Species Management Division
National Marine Fisheries Service

Dear Mr. Warren,

The International Game Fish Association thanks the National Marine Fisheries Service for the opportunity to provide comments on the proposed rule for Draft Amendment 7 to the 2006 Consolidated Highly Migratory Species (HMS) Fishery Management Plan (FMP). Western Atlantic bluefin tuna require better domestic fisheries management and the pelagic longline fishery, in particular, needs to be significantly curtailed to reduce historical high levels of bluefin bycatch.

Overall we feel that the proposed rule is a step in the right direction for better managing imperiled western Atlantic bluefin tuna. Specifically, we support establishing a strict bycatch cap for individual vessels and the entire pelagic longline fleet. We also support proposed video monitoring of individual longline vessels to help ensure catch accountability.

However, we feel that the proposed rule also needs to be strengthened in several key areas:

- We are strongly opposed to the preferred alternative of reallocating quota from all other fishing categories—including recreational—to the longline category to help compensate for the 167 metric tons of bluefin tuna that are killed and discarded each year. Taking quota away from other categories that are fishing sustainably to help offset the indiscriminant and wasteful longline category is not the answer to reducing bluefin mortality and conserving the species.
- The proposed Gulf of Mexico gear restricted area covers too small of an area and far too short a time period. We suggest expanding this area to the entire Gulf EEZ and at a *minimum* for the months of March-May. Expanding the closure for additional months would provide better protection for bluefin and bycatch species such as blue and white marlin.
- The proposed Cape Hatteras Pelagic Longline Restricted Area should not allow conditional fishing access for longline vessels.
- We oppose allowing longline vessels into the Florida East Coast, the Desoto Canyons, the Charleston Bump, and the North East closed areas. Since their creation in 2000, these closures have resulted in a *significant* reduction in bycatch of sailfish, blue marlin, white marlin and other unintended bycatch species.
- Alternative fishing gears need to be fully explored to help mitigate the economic impacts of closed areas. We urge NOAA to work with BP to secure funding that will help longline fishermen switch to more selective gears such as greenstick and buoy gear that will allow them to continue fishing for species such as yellowfin tuna and swordfish, while minimizing interactions with bluefin tuna.

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

- We oppose the creation of a distinct recreational Gulf of Mexico quota for trophy sized bluefin. In 1982, ICCAT adopted conservation measures that prohibited directed fishing for bluefin tuna in the Gulf of Mexico. Although this measure is predicted to result in the harvest of a maximum of eight trophy fish, we feel that creating a recreational Gulf quota is tantamount to establishing a directed fishery for spawning bluefin tuna.

We hope you find these comments constructive and helpful in strengthening the much-needed conservation measures in Amendment 7.

Sincerely

A handwritten signature in black ink, appearing to read 'J. Schratwieser', with a stylized flourish extending to the right.

Jason Schratwieser
IGFA Conservation Director