



Department of Commerce
National Oceanic and Atmospheric Administration
May 27, 2011

RE: Review of the New England Fishery Management Process

BOARD OF TRUSTEES

Bill Adler
*Massachusetts Lobstermen's
Association*

Niaz Dorry
NAMA Coordinating Director

Madeleine Hall-Arber, Ph.D.
Board Vice President
MIT Center for Marine Social Sciences

Ted Hoskins
Saltwater Network

Sarah Pickell
Board Treasurer
Institute for Local Self Reliance

Curt Rice
Board President & Clerk
Commercial Fisherman

Neil Savage
*Aquaculture Education and Research
Center*

STAFF

Niaz Dorry
Coordinating Director

Sean D Sullivan
*Marketing, Outreach and Development
Associate*

Boyce Thorne Miller
Science & Policy Coordinator

Brett Tolley
*Community Organizer & Outreach
Coordinator*

We urge NOAA (National Oceanic and Atmospheric Administration) and the New England Fisheries Management Council (NEFMC) to take immediate action based on the recommendations of the independent "New England Fishery Management Review and National Science Report".

We believe the following recommendations from the report should become top priority with additional considerations that will make each more effective:

- **Create a regional vision and strategic plan** to define a new model for collaborating with all stakeholders and to set a future direction for the fishery.
 - Use the vision outcomes in defining clear objective criteria for determining the success of management decisions.
- **Improve collaborative research and the Research Set-Aside (RSA) programs**
 - Establish a clear process for designing research and incorporating results into Coastal and Marine Spatial Planning as well as Ecosystem Based Fisheries Management;
 - Integrate New England fisheries management with Coastal and Spatial Marine Planning (CMSP) and Ecosystem Based Fisheries Management (EBFM), one mandated by the new National Ocean Policy and the other by the Magnuson Stevens Reauthorization Act (MSRA), by placing a greater emphasis on appropriately fine scaled scientific information as necessary for both.
- **Maximize collaboration** across the system.
 - Acknowledge the losses and gains each stakeholder group will experience as a result of improved sharing of information and collaborative decision-making;
 - Identify and include all stakeholder groups and bodies that benefit from healthy marine ecosystems including chefs, institutional purchasers, consumers, fishermen, NGO's, as well as shore-side service providers, from seafood dealers to marine services.

NEED FOR A VISION

The development *and implementation* of a vision is the single most important recommendation of the report. A clear vision developed collaboratively and a path forward that ties decision-making to the vision are critical to addressing the chronic issues that have long plagued our fishing communities as well as enabling adaptive responses to sudden new challenges that arise.

We recommend as soon as possible that the NEFMC conduct a comprehensive collaborative fleet visioning process that includes all stakeholders. We urge the NEFMC to use the Northwest Atlantic Marine Alliance (NAMA) Fleet Visioning Project and the ongoing Mid-Atlantic Fisheries Management Council (MAFMC) Visioning process as models for developing a comprehensive vision for New England.

NAMA offers the data and outcomes of our fleet vision project to jumpstart a comprehensive visioning process here in New England. The Fleet Vision Project Outcomes are complimented by recent projects including the Northeast Fisheries Science Center's (NEFSC) Catch Share performance measures, the Ecosystem Pilot Project and the RMSA National Standards, all of which confirm the relevancy and ability of the visioning process to produce relevant and measurable outcomes.

Defining a vision will also allow the NEFMC to better “[d]efine clear, objective criteria for determining the success of a management decision,” another of the report’s recommendations. Once a vision with specific goals has been agreed, future decision-making should become easier and more focused by asking the simple question: “Which route will best move us toward achieving our vision?”

COLLABORATIVE RESEARCH

Solid, reliable scientific research and monitoring on all ecologically important scales is critical to managing fisheries, recovering fish populations, implementing EBFM, and participating in CMSP processes. Consequently, expanding and improving collaborative research is essential. And it should include socio-economic science as well as biological research. Enhancing the ability for fishermen to engage with scientific researchers will lead to a more holistic and accurate picture for what is happening in the ocean as well as in our coastal communities.

Building cooperation and trust between responsible fishermen and responsible government researchers will help achieve another of the recommendations in the report to build industry confidence in government survey data. Mutual trust between government scientists and fishermen scientists is at an all time low. Well designed and supported collaborative research would go a long way toward healing that rift.

Two scientific benefits of incorporating collaborative research more directly into fisheries management are: 1) the ability to address finer scales of biological information, and 2) the ability to have more real-time production and use of data so that adaptive management can finally become a reality.

For the sake of our fish and fisheries, our coastal communities, and the services provided by our ocean ecosystems, we cannot afford a data-collection model that doesn’t prioritize collaborative research.

MAXIMIZE COLLABORATION ACROSS THE SYSTEM

Maximizing collaboration across the system means engaging with all the stakeholders involved in the fisheries. We often hear of stakeholders who feel hopeless with the process, unstable with the constant change of direction, and helpless to impact the decisions. This includes fishermen, shoreside fisheries-related industry, social and marine biologists, coastal and marine environment advocates, food-system experts, restaurants, consumers and the many other businesses and individuals who are affected by the fisheries management process. Stakeholders should include everyone who would benefit from healthy marine ecosystems and fisheries – not just industry insiders.

We highly recommend adding a stage that is often ignored in the collaborative process: hearing and acknowledging the losses and gains that have been experienced in the past -- and stand to be in the future -- by the various players as changes are brought about in fisheries management. It is important to include government bodies in this discussion, as they also experience losses and gains. We firmly believe that taking the time to do this will change the tenor of the collaborative process from one in which everyone at the table tries to stake out as much of their own interest as possible – i.e. a power struggle – to one of improved mutual understanding and ability to find common goals. This process has been used effectively to jumpstart collaboration in entrenched conflict. NAMA would be happy to provide recommendations for

facilitators well versed in this process.

The following recommendations from the report will also be helped greatly by establishing an effective collaborative process:

1. "Building a shared sense of accountability for outcomes among the Northeast Regional Office (NERO), NEFSC, and NEFMC," to which we would add "and the fishing community."
2. "Reducing the negative impacts of lawsuits and politics on the process."
3. Streamlining NOAA's response to stakeholder requests.
4. "Creating a more welcoming environment at the Council meetings."
5. "Fostering and environment [in NMFS] of service to the industry," and we would add "and coastal communities"; and we believe this should apply to the Council as well as NMFS.

We support recommendations to foster a more welcoming environment at NEFMC meetings. In particular we urge that NEFMC make every effort to ensure that fishermen themselves are not only encouraged but also provided incentives to attend meetings. The number of fishermen at meetings has dwindled over the years, as many have "lost faith" in the process. By changing the attitude exhibited toward fishermen and other guests in the audience at Council meetings, the NEFMC may not only show a stronger 'service ethic' to the fishing industry and their communities, they may actually begin to feel it.

BEGINNING THE COLLABORATION

The only way to break from entrenched positions and institutional lethargy is to anchor the decision-making in a common vision for the future of the fishery. We believe that the Fleet Visioning project has shown that the very same diverse stakeholders who's critiques of the management process appear in this report, can and will agree that a diverse fleet, healthy oceans, economic viability and participatory governance form the baseline from which to move forward to re-establishing the New England fleet as the most productive source of sustainably caught wild seafood in the world.

Much hard work has been done to arrive at a point where this conversation can and should take place. The "Review of the New England Fishery Management Process" report concludes that, "After completing our themes, we reviewed past efforts and concluded that many past and current efforts have arrived at similar conclusions. This indicates that little change has been made over the years."

The only way to avoid inaction and failure of reform is to engage all stakeholders in the creation of an encompassing vision. The surest way to fail at reform is to move forward blindly and ignore stakeholder input in the creation of a shared future.

Thank you.

Website that includes full report, space for public comments, and more info.:

http://www.nmfs.noaa.gov/publicreview/new_england_phase1/index.htm#commentGuidelines