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August 08, 2011

Mr. Rip Cunningham  
Chair, Groundfish Oversight Committee  
New England Fishery Management Council  
50 Water Street, Mill 2  
Newburyport, MA 01950

RE: Amendment 18 Scoping Document

Dear Rip Cunningham,

In June the Council tasked its Groundfish Committee to develop a Scoping document and proceed with an amendment to address fleet diversity and excessive consolidation. **On behalf of the Northwest Atlantic Marine Alliance we would like to support the Committee approving the Amendment 18 scoping document.**

We applaud the Council for acknowledging the fact that, as stated in the scoping document, current sector management leads to consolidation and lack of diversity in the groundfish fishery. We know the Council recognized these threats as demonstrated by its stated objectives in Amendment 16. But we also know that the Council was not successful to meet these objectives during the Amendment 16 development.

Amendment 18 is an opportunity to address the goals and objectives of Amendment 16 while ensuring the Council acts to prevent excessive consolidation, which has created problems with Catch Share programs elsewhere as well as land based food systems including:

- Loss of biodiversity.
- Undermining the Council's ecological goals.
- Hurting infrastructure as well as access to local fish.
- Creating a fishery that is unaffordable for independent fishermen.
- Leading to an unstable marine based food system.
- Leading to loss of direct and indirect employment in fishing communities.
- Discouraging young fishermen from entering the fishery.

We want to emphasize that the impacts of consolidation extend beyond shifting the historical make-up of the fleet to include ecological, social, and economic consequences that may threaten the Council's goals heading into the future.

Over the past year NAMA has provided the Council with information about how uncontrolled consolidation in Catch Share programs leads to a lack of fleet diversity and excessive ownership.<sup>1 2</sup> We have also provided testimony and information about how excessive consolidation has led to an unstable food system. This is an important point as fisheries are meant to feed our communities therefore lessons from the land based food system are critical to this process.

Overall, we recommend that:

- 1) The Amendment 18 Scoping document provide a clear problem statement.
- 2) The Amendment 18 Scoping document include the slate of goals voted on by the Council at its June 2010 meeting. (see below)

The comments below address three sections of the draft Scoping document.

### **Section 1: What Actions Have Already Been Taken**

Council members and staff have devoted significant time and resources to the critical issue of fleet diversity and consolidation. In June 2010 the Council voted on four specific goals related to fleet diversity and consolidation. In September 2010 the Council staff created a white paper on fleet diversity and consolidation. In November 2010 the Council voted to prioritize an amendment to address fleet diversity and accumulation limits. In June 2011 the Council organized a fleet diversity and accumulation limits workshop.

We recommend that these actions also be included in the Scoping document. By providing a fuller array of actions the public will have a greater understanding of the issues and will therefore be able to provide stronger feedback.

### **Section 2: Two Objectives for this Amendment**

The Scoping document currently has two primary objectives: to address fleet diversity and excessive accumulation.

We recommend that the Scoping document objectives also include the list of objectives from the Council vote on June 23, 2010:

1. Maintain inshore and offshore fleets;
2. To the extent possible, maintain a diverse groundfish fishery, including different gear types, vessel sizes, geographic locations, and levels of participation;
3. Maintain a balance in the geographic distribution of landings to protect fishing communities and the infrastructure they provide; and
4. Prohibit any person from acquiring excessive access to the resource, in order to prevent extraction of disproportionate economic rents from other permit holders.

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<sup>1</sup> "Addressing the Ecological Implications of Consolidation and Quota Accumulation Under Amendment 16", submitted by NAMA to the Council September 2, 2010.

<sup>2</sup> "Maintaining Fleet Diversity in the New England Groundfish Fishery" submitted to the Council June 5, 2011.

By aligning the June 23 objectives with the Amendment 18 objectives the Council will ensure this amendment heads in the direction the Council voted to go. Also, by having more clear Scoping objectives the public will be able to engage on a more practical level and have a clearer understanding for what the Council wants to achieve. Any proposed solutions may then be measured up against a set of clear goals.

**Section 3: What Issues May be Addressed in this Amendment?**

We applaud the Council for including bullet point number four:

- Other measures to promote diversity within the fleet such as new entrant set-asides, owner-onboard requirements, and community quotas.

We stress that no single option can achieve all of the stated Council goals. Rather, like a toolbox, each option may help to reach one or more goals, each will do some jobs better than others, and they will prove more effective if implemented jointly.

The scoping document is a starting point to inform the public and begin the scoping process. The goal of the process is to identify the range of issues surrounding fleet diversity and excessive consolidation. The Council has devoted significant time and resources to the issues and there is no justification at this point to delay the process any further. We urge the committee to consider our recommendations, approve the Scoping document, and begin the formal process as soon as possible.

Thank you,



Brett Tolley  
Community Organizer