

31 May 2016

176 Mulberry Street
New York NY 10013

South Atlantic Fishery Management Council
4055 Faber Place, DR. #201
North Charleston SC 29406

Attention: Dr. Michelle Duval, Chair, SAFMC
John Carmichael, Deputy Executive Director, Science/Statistics

Re: SEDAR Committee meeting Tuesday June 14, 2016 - Dolphinfish

Dear Dr. Duval and Mr. Carmichael,

Grateful your distribution of this letter to the SEDAR Committee.

The American Bluefin Tuna Association (<http://www.theabta.com/>) represents handgear fishermen who fish for Atlantic bluefin, bigeye, yellowfin and albacore tunas. In 2015, 3,129 vessels were issued Commercial tunas fishing permits, 3,596 vessels were issued Charter/Headboat tunas permits and 20,157 vessels were issued Recreational tunas permits.

Those fishermen who are targeting Atlantic tunas have a vested interest in the management of the dolphinfish fishery. The SAFMC manages dolphinfish stock as one management unit from FL to ME under an agreement with the MAFMC and the NEFMC and we take this opportunity to remind the SAFMC that management of this fish stock should take into account the considerations of fishermen in the Mid-Atlantic and New England as well as those of the South Atlantic, equally.

We appreciate the opportunity to provide our comments to the SEDAR Committee.

Dolphinfish is a highly-fecund, highly-migratory, pelagic species. It is considered a "cosmopolitan" species, not unlike Atlantic skipjack in certain significant ways. Consequently, it is possible that a dolphinfish assessment can present certain unique challenges, as does the assessment of skipjack. Dolphinfish habitat is the entire equatorial and sub-equatorial region of the Atlantic Ocean and adjacent seas and is actively harvested by many countries. Dolphinfish are carried into more temperate areas adjacent to the U.S. East Coast by the Gulf Stream.

Dolphinfish has been assessed only once (Praeger 2000). According to the author, this was a "draft" assessment, based upon 5 prior years of landings. Dolphinfish is presently believed to be "not overfished" and with "overfishing not taking place". Notwithstanding its seemingly ubiquitous nature, U.S. science lacks an important baseline measurement of spawning stock biomass - either a measurement of virgin

(unexploited) SSB or a measurement of SSB (exploited) - against which it can measure present SSB. Therefore, the status of this stock is only a matter of speculation.

The Dolphinfin/Wahoo Committee is presently contemplating an amendment to the FMP. This is alarming in view of the fact that this stock is not only data-poor but lacks a single, complete and up-to-date assessment. In our view, it would be irresponsible in the extreme to consider an amendment to the FMP at this time without first obtaining an assessment of this stock. Recent events in 2015 that have had a negative effect on the fishery support this view.

There has been much speculation surrounding the reasons for the necessity of prematurely closing the dolphinfin commercial fishery in 2015. Some mention the possibility of a successful year-class. Others mention a shift in fishing effort. Recent science would suggest that "Year" will tend to be a large component in determining dolphinfin catch, higher than many other environmental variables examined. This tends to be attributed to a high variability in year class recruitment for this short-lived, fast-growing species. Consequently, one very good fishing year would not necessarily be something out of the ordinary. However, if this trend - early realization of commercial ACL - were to continue, it might be indicative of a shift in effort. But the foregoing is speculation: all the more reason to conduct a stock assessment.

The need for a dolphinfin stock assessment is not a matter of debate. Very little is known about dolphinfin population dynamics.

We have been advised by Dr. Clay Porch that there is indeed a way to expedite an assessment of a fish stock. Therefore, we urge the SEDAR committee to do its utmost to prioritize this assessment.

Cordially,

David Schalit, Vice President
American Bluefin Tuna Association

cc: Dr. Clay Porch, Sustainable Fisheries Division Chief, SFSC
Margo Schulze-Haugen, Chief, NOAA Fisheries Highly Migratory Species
Management Division
Mr. Nikhil Mehta, SAFMC