

Friday, October 31, 2008
Todd J. Zinser, Inspector General
US Department of Commerce
Office of Inspector General
1401 Constitution Avenue, NW
Room 7898C
Washington, DC 20230

Dear Mr. Zinser:

We are writing to you about the scientific assessment of the status of fish stocks in New England, and specifically the assessment of groundfish recently completed at the Northeast Fisheries Science Center (NEFSC) by an international team of experts. In August (28 August 2008), you received a letter from Senators Collins, Kennedy, Kerry, and Snowe requesting that your office investigate the scientific methods and work carried out at the NEFSC to assess the status of New England fish stocks.

We would like to offer our perspective on the assessment conducted at the NEFSC and the request directed to you by the senators from Maine and Massachusetts. We are a group of scientists who have a keen interest in the health of fish populations and the fisheries they support in New England. Each of us is familiar with the science conducted at the NEFSC and the recent Groundfish Assessment Review Meetings (i.e., GARM III) that culminated September, 2008.

The Northeast Fisheries Science Center is a world renowned center with an outstanding team of fisheries biologists and one the most comprehensive scientific fisheries research surveys in the world. Nevertheless, the assessments carried out in New England are not just the work of the NEFSC. These assessments involve teams of scientists from around the world, peer reviewers, and open meetings allowing interested parties to observe and comment.

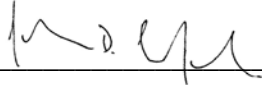
The recent assessment of New England's codfish and other stocks in the important groundfish complex (GARM III) was the most rigorous assessment ever conducted at the NEFSC. The assessment was a peer reviewed process that took almost a year, and involved four multi-day scientific workshops dealing with data, modeling approaches, analysis, and interpretation. The workshops included scientists from around the globe, including South Africa, Canada, and Great Britain. The process was peer reviewed by experts from the *Center for Independent Experts*, and observed by dozens of members of the public. In a word, the integrity of this scientific process was exceptional.

Like all science, the science of stock assessment is imperfect. Just as there is uncertainty in biomedical science, there is uncertainty in fisheries science, and scientists do their best to both minimize and to highlight these uncertainties. The assessments for the 19 groundfish stocks just released are not perfect but the methods and expertise brought to bear on the available data were excellent. Ironically, the questions posed in the letter from the New England Senators are the very questions that have been carefully considered over the past year by expert scientists from around the world, building on previous assessments done in New England and abroad.

It is worth recalling that not long ago the US Congress mandated that the National Academy of Sciences review the stock assessments, including data collection methods, assumptions and projections, and all relevant information used in the Northeast multispecies fishery. This intensive review of the NEFSC and its approach to stock assessments culminated in *Review of Northeast Fishery Stock Assessments* (NRC Press, 1998). The scientific team made a thorough review of all practices and undertook replication of key assessments. The findings of the reviewers were highly favorable and constructive. The review supported the integrity of the assessment process and methods, and offered important suggestions for improving New England assessments. Over the course the past decade, we have seen the NEFSC work diligently to implement the suggestions for improvement and yield increasingly high quality scientific work. In other words, the scientific process associated with the GARM has already been vetted for rigor, several times. Another review is highly unlikely to produce a happier outcome.

It is difficult for us to reconcile this history, and our own observations, with the constituent concerns reflected in the letter you received from Senators Collins, Kennedy, Kerry, and Snowe. The request for additional scrutiny of the science stands to divert attention from the critical matter of achieving sustainable fisheries practices through responsible science-based management in New England. We urge you to consider these comments as you proceed with your investigation.

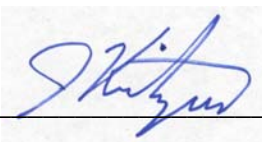
Sincerely,



John D. Crawford, PhD
Pew Charitable Trusts &
Boston University Marine Program



Les Kaufman, PhD
Boston University Marine Program



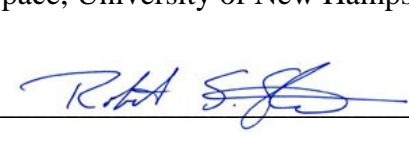
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cc:

Paul J. Howard, Executive Director, New England Fisheries Management Council
James W. Balsiger Ph.D., Acting Assistant Administrator of Fisheries, NOAA/NMFS
Patricia Kurkul, Regional Administrator, Northeast Region, NOAA/NMFS
Susan M. Collins, US Senate, Maine
John F. Kerry, US Senate, Massachusetts
Edward M. Kennedy, US Senate, Massachusetts
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