

**PEG Testimony before the Caribbean Fishery Management Council**  
**April 7, 2010**

Good afternoon, Chairman Pinero and council members. My name is Holly Binns, and I represent the Pew Environment Group's Campaign to End Overfishing.

Thank you for the opportunity to provide input on the development of the Comprehensive Annual Catch Limit Amendment.

First, we would like to commend the territorial governments, local fishermen, the Council and National Marine Fisheries Service for your joint efforts to improve and expand data collection efforts in the region. The Science and Statistical Committee provided significant recommendations related to this, and we are very pleased that the Council relied on the advice of your science advisors by adopting all of the SSC recommendations this morning.

We are here to support the Council as you go through the challenging process of developing Annual Catch Limits and Accountability Measures for species under your jurisdiction. This is a critical step for the Council to take not only because it is required by law, but also because 40 years of fisheries management has demonstrated that catch limits and accountability measures are effective tools to improve the health of fish populations and the viability of the fishing communities that rely on sustainable fish populations. They can also play a role in maintaining the overall health of the larger marine ecosystem.

We believe the Council has developed a good range of alternatives to account for uncertainty, which is a key provision of the reauthorized MSA. We urge the Council to follow the advice of the Southeast Fisheries Science Center on this issue by setting the ACL at 75% of the OFL, at a minimum.

We are concerned about the proposals to base the queen conch ACL on the average landings, when those landings were overfishing by 80%. Species undergoing chronic overfishing should not have their allowable catch increased without proper scientific justification.

Additionally, we concur with the recommendations put forward this morning by NOAA's Protected Species Division to set the parrotfish ACL conservatively. Again, we feel it is not appropriate to base an ACL on average landings when those landings represent overfishing (as with all species affected by this

amendment). There is extensive scientific literature documenting the important role that parrotfish play in keeping coral reefs and beaches healthy – both of which are vital to the economy of the region. It is of vital importance that the Council take steps to ensure that parrotfish are adequately protected.

Thank you again for the opportunity to provide input, and we look forward to working with you all to ensure sustainable fish populations for generations to come.

## VICS TESTIMONY TO CFMC

April 7, 2010

"Good Afternoon, Chairman Piniero and council members. My name is Tiffany Cummins, and I am here today representing VICS, the Virgin Islands Conservation Service. VICS is the oldest non-profit conservation organization in the USVI. Since VICS its incorporation in 1968, VICS has supported conservation and environmental protection primarily through it's chapter organizations, St. Croix Environmental Association (SEA) and the Environmental Association of St. Thomas and St. John (EAST).

For many years, VICS has worked to protect our coastal waters and marine resources, including fisheries. VICS recognizes the impacts of coastal development and pollution (both point source and non-point source) on fisheries, coral and other marine resources. Over the years VICS, SEA and EAST have actively engaged in advocacy (including litigation) to mitigate impacts on marine water quality and important marine habitat.

For example, VICS and SEA are currently plaintiffs in litigation involving ocean discharge of tertiary treated wastewater from Anguilla Wastewater Treatment Plant, and energy generation from petroleum coke (which would result in shipment of huge quantities of hazardous materials through St. Thomas and St. Croix waters with the attendant risk of groundings and spills).

We are here today to express our support for the work you all are doing to ensure sustainable fisheries through the development of the Comprehensive Annual Catch Limit Amendment. The issues being discussed at this meeting are vital to the long term recovery of species such as groupers and snappers; and to prevent future population declines.

Thank you for the opportunity to be here today, and we urge you to continue to move quickly to finalize this important amendment."