




THE
PEW
ENVIRONMENT GROUP



**END OVERFISHING
IN THE SOUTHEAST**

www.sustainablesefisheries.org

January 28, 2010

RE: Proposal to Re-introduce Fish Traps in Amendment 32 & Request to Issue an Experimental Fishing Permit

Dear Chairman Shipp,

We are writing to provide comments on alternatives in the Options Paper for Amendment 32 related to the re-instatement of fish traps. The use of fish traps was phased out in the Gulf of Mexico in 2007. The reasons cited for this decision by the Gulf Council include incidental catch of non-targeted species, enforcement and non-compliance issues, long-term ghost-fishing, and habitat destruction. The Pew Environment Group supports that Council action and is opposed to reintroducing fish traps in the Gulf of Mexico. Absent new data that clearly demonstrates significant conservation benefits in comparison to other gear currently approved for use in the Gulf, we strongly encourage the Gulf Council to remove from consideration alternatives in Amendment 32 that would re-introduce fish traps, and discourage the Council from considering their re-introduction in any future amendment.

Currently, gag are caught directly and indirectly in the grouper commercial longline and vertical line reef fish fisheries. Before their phase out, gag catch made up less than 5% of the total grouper landings from fish traps. Since traps are not as efficient at catching gag as other gear, fish traps are purported to reduce bycatch of gag. However, the anticipated reduction in gag bycatch would only occur if there was a transition from longline or vertical lines to trap gear. Furthermore, this transition would not mitigate the serious concerns associated with use of this gear, as outlined above. Therefore, it is inappropriate to allow the re-introduction of fish trap gear in the Gulf of Mexico as part of a strategy to reduce gag bycatch in the commercial fishery.

We understand there is an application for an Exempted Fishing Permit (EFP) to begin to investigate the performance of a new fish trap design called an "Excluding Fishing Device." To assess the efficacy of any new trap design, rigorous scientific research would be required. We firmly believe in pursuing new scientific information in order to better inform fisheries management, and commend the effort to develop innovations such as gear modification to address bycatch. In general, we believe that this type of pro-active response to management should be encouraged. However, any pursuit of data to support use of this new trap design should be done systematically and objectively through independent scientific channels. In addition, the

issues related to enforcement, compliance, incidental catch, ghost-fishing and habitat damage would need to be thoroughly addressed and overcome.

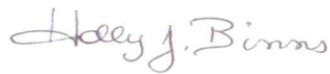
The EFP application before the Council does not provide sufficient information regarding how the data collected would be evaluated, and it is unclear whether the design of the study, as proposed, could adequately address the suite of issues associated with this gear. Thus, we believe it is inappropriate to issue this EFP at this time and in this form.

Thank you for the opportunity to comment on this issue, and we look forward to working with you and the Council to ensure sustainable fish populations in the Gulf of Mexico.

Sincerely,



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