



Testimony of the Pew Environment Group before the Gulf of Mexico Fishery Management Council

April 14, 2010

Good Morning, Chairman Shipp and Council Members. My name is Holly Binns and I manage the Pew Environment Group's Campaign to End Overfishing in the Southeast. The Pew Environment Group is the conservation arm of the Pew Charitable Trusts. Thank you for the opportunity to provide input today on Amendment 32 and the Generic ACL Amendment.

In Action 2 in Amendment 32, we understand the reasoning behind removing the ACL control rule from the document, and instead incorporating it as part of the Generic ACL Amendment. However, in the absence of control rules we urge the Council to be more explicit in describing how the remaining alternatives under Action 2 account for management uncertainty or to add alternatives that incorporate elements of the ACL control rule to account for management uncertainty.

Given the severe depletion of the gag grouper population and the high fishing rates, we also strongly encourage the Council to move forward with an interim rule to put in place some protections for gag by January 2011.

Generic ACL Amendment

Regarding the Generic ACL Amendment, we are not opposed to options in Action 1 to transfer management authority for yellowtail and mutton snapper, Nassau grouper, and octocorals to the South Atlantic Council and the transfer of management for stone crabs to the state of Florida, provided their authority extends into the Gulf for these species.

In Action 2, we support removing from consideration the designation of stocks as ecosystem component species. The National Standard 1 guidelines are explicit about what types of species qualify for this category, and no species in the Gulf Council's FMP meet the criteria. It would be more appropriate to include less frequently encountered species in species complexes so that management authority is retained.

However, there are several species, including white grunt, black sea bass, red porgy, and others which are heavily targeted in federal waters but are not currently in FMPs. Relatively little is known about the health of these populations. Including them in a fishery management plan would allow the Council to better monitor and assess these fisheries, and we urge the Council to consider this as an option.

In Action 3, we support the use of appropriate species groupings that consider biological and life history characteristics, vulnerabilities, and fishery overlaps. However, these complexes should be as simplistic and intuitive as possible

In Action 4, we strongly support the use of the ABC Control Rules once finalized. However, these rules will need to address how to set ABCs at the stock complex level, or some other method to deal with this should be included in the document.

In Action 5, we support use of control rules to set ACLs and ACTs as a consistent and more objective means of establishing these limits. The draft ACT control rule proffered by staff is a good first step, but further analysis is needed to better address management success and the accuracy of the catch estimations. It should also be explicitly articulated in the document that these control rules will apply to all managed species going forward.

Electronic monitoring

Finally, we support efforts to improve recreational data through more timely data delivery mechanisms and the motions proposed by the Ad Hoc Data Collection AP to advance electronic monitoring for the for-hire sector. Having more timely data will allow for more responsive and adaptive management, and it makes sense to start with electronic reporting for the for-hire portion of the recreational fishery while methods to address private recreational data collection and delivery systems are developed.

We understand the desire to move quickly on this front, but caution that there needs to be a clear understanding of the how the data will be utilized so that it is collected and reported in a way that meets scientific and management needs, and to ensure that it is accurate, reliable and verifiable.

Thank you again for the opportunity to share this input.