



FORMERLY THE NATIONAL COALITION FOR MARINE CONSERVATION (NCMC)

January 10, 2014

Mr. Tom Warren
Highly Migratory Species Management Division
National Marine Fisheries Service/NOAA Fisheries
55 Great Republic Drive
Gloucester, MA 01930

RE: Comments on Amendment 7 to the HMS FMP

Dear Mr. Warren,

I am submitting the following comments on behalf of *Wild Oceans*, an independent non-profit group of anglers dedicated to an ecosystems approach to conserving salt water fish. Our programs emphasize protecting the ocean's top predators – the billfish, tunas, swordfish, and sharks – while preserving healthy ocean food webs and critical habitats essential to the survival of all fish, marine mammals, sea turtles and seabirds.

Preface

Amendment 7 to the Atlantic Highly Migratory Species Fishery Management Plan is badly needed to protect one of the ocean's most threatened species of fish, the Atlantic bluefin tuna, from one of the most lethally indiscriminate types of fishing gear, the pelagic longline.

The range and sheer complexity of some of the measures proposed by the National Marine Fisheries Service (NMFS) in the Draft Amendment confirm what we've learned from decades of experience attempting to regulate and control catches of bluefin and other highly migratory species on pelagic longlines. Longlining carries an exceptionally high cost, relative to

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other gears in the pelagic fisheries, in terms of its impact on rare and vulnerable species and the inordinate demands it places on limited resources available for monitoring and enforcement, a price that is ultimately paid by other fishermen and taxpayers.

For this reason, the amendment must be reviewed and evaluated as to how well the selected alternatives, in the aggregate, provide incentives for pelagic longliners to employ safer, more selective fishing methods and avoid bluefin interactions, rather than merely finding a way to “manage” these interactions.

In previous comments on the developing draft, as well as in comments on earlier proposals to reduce bycatch in the pelagic longline fishery, we have consistently recommended the use of time-area closures and a strict cap-and-close strategy.¹ Both closed areas and a hard cap on bycatch, separately or in tandem, provide a strong incentive for fishermen to use alternative fishing strategies or gears.

We are pleased, then, that NMFS is proposing, among its preferred alternatives, a pair of new closed areas to longlining and a bycatch cap that, when reached, triggers an end to all longlining for the remainder of the year.

Time-area closures – in other words, taking the gear out of the water when and where it is doing the most harm - have proven to be the single most effective means of reducing longline bycatch. The no-longlining zones implemented by NMFS in 2000 are responsible for dramatically reducing bycatch of billfish, oceanic sharks and juvenile swordfish by 50-70%. [See table on page 7] Closed areas also create incentives for fishermen to explore more selective alternative fishing gears, as commercial fishermen on the east coast have done in cultivating the use of buoy gear for swordfish and greenstick gear for tunas. [“Best Fishing Practices for Bluewater Fisheries,” a *Wild Oceans* briefing paper, is appended to these comments at page 11.]

But even though Draft Amendment 7 contains most of the right ingredients for reducing bycatch of bluefin tuna (and other species) in the pelagic longline fishery, NMFS’ recipe of preferred alternatives utilizes these ingredients in the wrong proportions, either too much or too little. Specifically, the Gulf of Mexico closure is not large enough or long enough. The bycatch quota allocation to the longline fishery, on the other hand, is much too big.

¹ E.g., see NCMC Comments on the Advanced Notice of Proposed Rulemaking for Atlantic Highly Migratory Species; Pelagic Longline Incidental Catch Requirements (0648-AX85). August 2009.

As a result, the suite of measures preferred by NMFS is mostly successful in turning high levels of dead discards into regulated landings and keeping the United States within its internationally-established quota. These are positive management ends, to be sure. But the means to achieving them do not adequately address the more urgent and critical *conservation* goals of lowering mortality on the severely depressed western Atlantic bluefin tuna spawning population, minimizing bycatch of other vulnerable species, and providing incentives to fish with more selective and sustainable gears.

Summary of *Wild Oceans* Recommendations

In our view, the multiple FMP objectives of rebuilding western Atlantic bluefin tuna, with extra-protection for spawning fish; reducing bycatch and dead discards of bluefin along with other incidentally-caught species; and managing bluefin within the U.S. quota without disadvantaging tuna fishermen in selective-gear categories; can be achieved by:

- Limiting the longline category to its current 8.1% share of the U.S. quota and setting the corresponding metric tonnage of bluefin as a hard bycatch cap;
- Closing the entire Gulf of Mexico to longlining from March through May, covering the height and breadth of the bluefin's breeding season;
- Establishing a new longline closed area off North Carolina to reduce longline interactions with pre-spawning tuna;
- Maintaining the existing longline closed areas, with access permitted only under an Exempted Fishing Permit for research purposes; and,
- Treating the use of quotas within the overall bycatch cap, whether regional, group or individual, as a limited experiment that, in this initial phase, affords no long-term rights to a share of the U.S. quota or windfall profits through lease or sale of shares.

The specific alternatives supported by *Wild Oceans* are summarized in the table on page 4, with additional explanation and supporting rationale in the following section.

DRAFT AMENDMENT 7	<i>Wild Oceans Preferred Alternatives</i>	Comments
<i>Quota Allocation (2.1)</i>		
	Alternative A 1 – <i>No Action</i>	Re-allocation of additional quota to the longline category would be accommodating bycatch, not reducing it.
<i>Area Based Measures (2.2)</i>		
Gear Restricted Areas	Alternative B 1b – <i>Cape Hatteras Pelagic Longline Gear Restricted Area</i>	Reduces interactions with pre-spawning bluefin while providing non-longline fishermen a reasonable opportunity to fish in the new closed area.
	Alternative B 1e - <i>Gulf of Mexico Exclusive Economic Zone (EEZ) Pelagic Longline Gear Restricted Area</i>	Closes the entirety of the known western Atlantic bluefin spawning grounds for 3 months during the peak of breeding season.
Gear Measures	Alternative B 2b - <i>Authorization of Vessels with a Swordfish Incidental Permit to Use Buoy Gear</i>	Encourages longliners to switch to buoy gear, everywhere but the Florida East Coast, where hand-gears are already abundant
Access to Closed Areas Using Pelagic Longline Gear	Alternative B 3a – <i>No Action</i>	The existing closed areas provide the most effective longline bycatch reduction to date and should be maintained as no-longlining zones
<i>Bluefin Tuna Quota Controls (2.3)</i>		
	<u>Modified</u> Alternative C 2h – <i>Program evaluation after 3 years</i>	This modified alternative would revisit the bluefin management program implemented under Amendment 7, using biological as well as economic indicators
Regional and Group Quotas	Alternative C 3a – <i>Regional Quotas</i>	Regional quotas would be a simpler and fairer allocation of the longline bycatch cap within the fleet

I. Allocation Alternatives

We support Alternative A 1 – No Action

NMFS-preferred Alternative A 2a is counterproductive and therefore unacceptable because it would increase the allocation to the longline category by 62.5 metric tons, thereby aligning the quota allocation with recent levels of bycatch, including dead discards.² This re-allocation would amount to bycatch *accommodation*, not reduction, achieving only what the agency describes as a “neutral or moderate beneficial impact” for bluefin and other incidentally-caught species. We can do better than that. In fact, increasing the allocation to the longline category, in combination with the limited scope of the NMFS-preferred longline gear restricted areas and increased access to existing closed areas, would at best maintain the *status quo* or worse, increase longline interactions with vulnerable HMS species.

We appreciate that, under our preferred Alternative A 1, dead discards would continue to be accounted for through annual specifications. However, bycatch and discards would be significantly reduced from recent levels by adopting the strongest and most effective bycatch reduction measures as recommended under Alternatives II and III below.

II. Area Based Alternatives

We support Alternative B 1b – Cape Hatteras Pelagic Longline Gear Restricted Area

A five-month winter closure (December-April) in this area off the coast of North Carolina would reduce interactions with bluefin tuna. Concentrations of pre-spawning bluefin in this area are fairly consistent at this time of year, as are high rates of incidental longline catch.³

The performance metrics for conditional access to the area under the NMFS-preferred Alternative B 1c are bluefin-centric; that is, they do not address issues of bycatch with other HMS species, and therefore we do not support that alternative. Alternative B 1b provides “reasonable opportunity” to fish in the closed area using gear other than pelagic longlines: rod-and-reel, greenstick gear, buoy gear, handline and harpoon.

² Draft Amendment 7. p. 34.

³ Draft. pp. 48-49.

*We support Alternative B 1e –
Gulf of Mexico Exclusive Economic Zone (EEZ)
Pelagic Longline Gear Restricted Area*

The amendment itself provides the rationale for this alternative: “The Gulf of Mexico is one of the areas where there are seasonal concentrations of bluefin, as well as consistent catches by the pelagic longline fleet. Pelagic longline logbook and observer data indicate that historically there have been relatively high catches and catch rates between pelagic longlines and bluefin tuna in this region. Because bluefin in the Gulf of Mexico are comprised of large fish that may be sexually mature or spawning, reducing all interactions with pelagic longline gear in the Gulf of Mexico may also enhance spawning potential and stock growth.”⁴ [emphasis added]

With respect to “enhancing spawning potential and stock growth,” we note that “we” have been engaged in efforts to rebuild the western Atlantic bluefin tuna spawning population for several decades now, with success measured primarily in preventing a stock collapse. The spawning numbers long ago were reduced to near-critical mass, and clearly not enough is being done to enhance breeding success for the remnant population.

From the beginning of this amendment process (much longer, really), we and others have advocated that NMFS close the northern Gulf of Mexico to all pelagic longlining, corresponding to the area designated a bluefin Habitat Area of Particular Concern in 2009, during prime spawning season. Alternative B 1e – which would close the entire gulf, an area slightly larger than the HPAC, during the months of March, April and May - most closely achieves this objective, while representing a compromise by still allowing longlining during the remainder of the year under the bycatch cap, and fishing with greenstick and buoy gear all year-round.

Finally, we must point out that the NMFS preferred Alternative B 1f, a small Gulf of Mexico closure, is too short and too small to account for the uncertainties in the timing and spacing of bluefin spawning activity and longline fishing patterns from year to year. The larger and longer GRA better ensures that interactions will be kept to a minimum.

⁴ Draft. p. 58

*We support Alternative B 2b –
Authorization of Vessels with a Swordfish Incidental Permit to Use Buoy Gear*

This alternative would encourage longline permit holders to use buoy gear instead, in all areas other than the Florida East Coast, optimizing their fishing opportunities throughout the range of their target species, swordfish, but without increasing conflicts with commercial and recreational fishermen in southern Florida.

*We do **NOT** support Alternative B 3b –
Limited Conditional Access to Closed Areas*

This NMFS-preferred alternative would allow a limited number of longline vessels/trips in areas of the eastern Gulf of Mexico and off the southern Atlantic coast that have been closed to longlining for well over a decade. These closures were instrumental in enhancing juvenile swordfish survival and contributing to rebuilding of the North Atlantic stock, as well as minimizing bycatch mortality of overfished blue and white marlin along with sailfish and many vulnerable shark species. Rebounds in the populations of these fish off the east coast, swordfish and billfish in particular, have re-vitalized offshore recreational fisheries and created new fishing opportunities for commercial fishermen using non-longline gears.

Effectiveness of Atlantic Coast Longline Area Closures⁵

	<i>Swordfish (Juvenile)</i>	<i>Pelagic Sharks</i>	<i>Blue Marlin</i>	<i>White Marlin</i>	<i>Sailfish</i>
Pre-Closures (1997-99)	21,519	52,093	1,621	1,973	213
First 3 Years of Closures (2001- 2003)	13,240	23,017	815	1,045	139
% Bycatch Reduction	-38.5	-55.8	-49.7	-47	-74.6

⁵ NOAA Fisheries Highly Migratory Species SAFE Report 2011. The expanded table on page 17 includes bycatch reduction data for 2005-2010 combining the effect of the closures and the required use of circle hooks.

Part of the NMFS rationale for allowing increased longline access to previously closed areas is “to provide additional fishing opportunities for permitted pelagic longline vessels, and mitigate the potential negative economic impacts of other draft Amendment 7 alternatives.”⁶ In other words, longliners would be allowed access to areas closed to reduce bycatch of non-bluefin HMS, with the risk of increased interactions with billfish, sharks and juvenile swordfish, in order to off-set the economic impact of new regulations necessary to reduce bluefin interactions. At best, it would be one-step-forward, one-step-back, which is an apt description of so many attempts to “manage” indiscriminate longlines.

III. Bluefin Quota Controls

We strongly support the management regime change, from one of prohibiting vessels using pelagic longline gear from retaining incidentally-caught bluefin when the category’s annual quota is reached, and thereby creating dead discards, to one of prohibiting fishing with longlines once their overall quota of bluefin is filled. As stated previously in these comments, we support maintaining the longline quota at the current 8.1 percent of the annual U.S. quota, with both landings and discards counted toward that limit. The Draft Amendment features several alternative ways of sub-allocating the overall longline quota: individual bycatch quotas (IBQs), regional quotas or group quotas, with subalternatives within each. Our preference is for regional quotas (Alternative C 3a), as explained below. However, regardless of which quota control program is implemented:

*We support a **Modified Alternative C 2h** –
Program evaluation after 3 years*

The Draft Amendment proposes formal program evaluation of an IBQ program after 3 years, however, we believe the bluefin tuna management program implemented through Amendment 7, in aggregate, whether it utilizes IBQs or not, should undergo evaluation. We also recommend that such evaluation be based on stated conservation performance indicators as well as economic performance indicators, and that the latter extend to non-longline fisheries impacted by the program.

As for the IBQ program, although we understand and support *in theory* the idea behind holding individual vessel operators accountable for their bycatch of bluefin and rewarding those operators who take steps to minimize

⁶ Draft. p. 62.

their interactions, we have a number of serious concerns about how the elaborate program proposed by NMFS will work *in practice*.

The allocation of highly-valuable bluefin tuna to individual longline permit holders, a type of catch share, could institutionalize the bycatch, creating additional pressure to keep overall bluefin quotas high and a disincentive for fishermen to switch to cleaner gears since they'd lose their bluefin share. We are troubled by the agency's notion of allowing longliners to market and trade their IBOs, even if only on an annual basis, "to create new potential for revenue"⁷, sales of a publicly-owned resource that could be viewed as a government subsidy of the longline fishery. We are also troubled by the agency's assertion that the ability to sell and trade shares is important because "most of the interactions with bluefin are by a relatively few vessels" that may "need" more quota.⁸

Of course, it could be that these measures do work to incentivize reduced interactions, as intended. On the other hand, it also could be that it allows vessels with historically high interactions to keep fishing rather than reducing those interactions, a result made more likely by the NMFS-preferred alternative of re-allocating an additional 62.5 metric tons to the longline category in line with recent catch levels.

The IBO system strikes us as enormously complex and extremely expensive to implement, and we don't pretend to understand how all of its intricate parts are designed to work together or what the outcome will be. We do wonder, however, if this program is grounded in a textbook case for catch shares⁹, rather than a real-world consideration of whether or not catch shares are appropriate for a fishery that is, lest we forget, a bycatch fishery.

For all of the above reasons, we strongly urge the agency to implement a hard cap on the longline fishery, but to treat whatever quota system is adopted as an experiment and give it a full review in 3 years time, retaining the regulatory flexibility to make changes as needed.

We support Alternative C 3a – Regional Quotas

Implementing a hard bycatch cap for the longline fishery and allocating it among regions may be the simplest approach, and certainly fairer than a single quota for the entire fleet. Potential difficulties described

⁷ Draft. p. 65.

⁸ Ibid.

⁹ NOAA Catch Share Policy, 2010.

in the draft related to delineating regions and setting corresponding quotas could be ameliorated somewhat by instituting a closure for the entire Gulf of Mexico, where many of the most damaging interactions occur, and re-allocating those interactions to other regions.

But no matter how the longline category quota, kept at 8.1 percent of the total U.S. share of western Atlantic bluefin tuna, is allocated within the fishery, it will require a substantial reduction in bycatch through a change in the way we fish. The most effective way to achieve that reduction is through a combination of new time-area closures (Alternatives B 1b and B 1e) and a conservative bycatch cap that triggers a cessation of longlining for the year, thereby providing a strong incentive for commercial swordfish and yellowfin tuna fishermen to switch to buoy gear and greenstick gear, respectively. That is where the measures contained in Amendment 7 must ultimately take us.

Thank you for all your hard work in preparing Draft Amendment 7 and for considering our views as you move to finalize it.

Sincerely,



Ken Hinman
President

Best Fishing Practices

BLUEWATER FISHERIES



Fishing is a human right for the many, not for the few.
Danish fisherman Kurt Christensen

Introduction

“Best management practices” for fisheries are based on pre-determined goals, such as locally-supplied seafood, recreation and tourism, community-based employment and, in support of it all, maintaining abundant and sustainable fishery resources and a healthy environment. Although the primary goals may be social and economic, the long-term health of the resource is always the bottom line. And while each region’s specific goals and needs may be unique, best fishing practices, such as low bycatch of non-target species, live release of incidentally-caught or undersize fish, and cost-effective monitoring and enforcement, are universal.

The billfishes, swordfish and tunas, along with dolphin-fish, wahoo and other pelagic species, support valuable recreational and commercial fisheries in many coastal regions. But studies suggest that populations of big ocean fish, including bluefin and bigeye tuna, swordfish, the marlins and many oceanic sharks, may have declined as much as 90 percent over the last 50 years. Efforts to restore them have been hindered in large part due to the non-selective nature of the fishing gears and methods used to target these fish commercially, most notably pelagic longlines, also commonly known as surface or drift longlines.

Some would contend that it is how many fish you catch, not how you catch them, that’s important to sustaining fish populations. But this misconception ignores a half-century of evidence to the contrary. Our collective experience with non-selective fishing gears is this:

- Excessive bycatch and waste, resulting in one-quarter of the global catch being discarded as unwanted, prohibited or protected species;
- An inability to effectively control fishing mortality for any single species in a fishery that opportunistically targets and catches multiple species;
- Destructive impacts on marine life and the ability of fishermen and coastal fishing communities to survive, much less thrive; and,

- Disproportionate management and regulatory costs imposed on taxpayers and regional economies.

Best fishing practices for conserving and managing big ocean fish require transitioning fisheries away from the large-scale use of indiscriminate, ecologically-harmful fishing gears to more selective, sustainable fishing methods that provide an economically-feasible, low-bycatch alternative. Fortunately, those alternative methods exist.

No More “Ocean Roulette”

In 1998, *Wild Oceans* (then National Coalition for Marine Conservation) published Ocean Roulette, a lengthy study of pelagic longlining, with a series of recommendations for reigning in its destructive impact. In the intervening 15 years, many of these recommendations have been or are being implemented. (Page 14) While bycatch of some species has been substantially reduced, it has come at considerable cost (measured in time, money, and lost fishing opportunities) and a number of serious bycatch threats remain (most notably to severely depleted bluefin tuna and endangered sea turtles, both of which are the object of ongoing federal actions.)

It is revealing of the unmanageable nature of longlining that the most effective regulations implemented are time-area closures; that is, taking the gear out of the water where and when it is doing the most harm. The east coast longline closures that have been in place since the year 2000 have reduced bycatch mortality for swordfish, billfish and sharks overall an average of 50 percent, saving many thousands of these fish over the past decade. (Page 15) Additional reductions have been achieved for some species since circle hooks were required on all longlines in 2005.

The circle hook requirement, however, merely underscores the fact that there is no regulatory fix for longline bycatch, aside from strictly limiting or prohibiting the gear. The conservation value of using non-offset circle hooks for marlin, sailfish and a number of other recreationally-caught species, instead of J-hooks, is well documented, substantially reducing post-release mortality. Circle hooks have also proven effective in reducing longline interactions with sea turtles and some non-target fish. But there is evidence that they can increase hook-ups with some species of billfish and shark, and because longline-caught fish can remain on the line for many hours, they die regardless of how non-lethal the hooks may be.

Mortality of bycatch species increases significantly with each hour after hook-up. Berkeley and Edwards (1998) used hook-timers in the Gulf of Mexico yellowfin tuna longline fishery to compare the mortality of fish upon retrieval with the time they spent on the hook. The tuna longliners used circle hooks almost exclusively. As shown on page 16, the mortality rate for billfish surpassed 50 percent (that is, more than half the fish dead) after they'd been on the hook for about 8 hours. Swordfish (mostly

protected juveniles) surpassed the 50 percent mortality mark less than 2 hours after hook-up.

Clearly, the major problem with longlines is that they are “long.” The typical set for swordfish or tuna is 30-40 miles in length, fishing over 1,000 hooks, and the hooks remain in the water from 12-24 hours. Shorter lines and soak times, say 6 hours or less, might diminish its lethal impact. But what we are talking about here is not pelagic longlining, which measures “efficiency” in terms of maximizing hooks fished on multi-day fishing trips, but alternatives to longlining – namely, swordfish buoy-gear and tuna green-sticks – developed, not surprisingly, by commercial fishermen in areas where pelagic longlines have been prohibited.

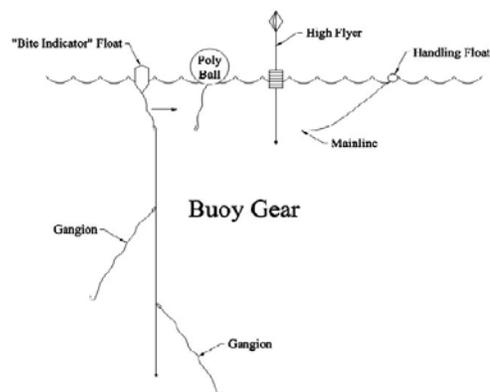
Safe, Sustainable Fishing for Large Ocean Fish

Take a picture of this...

A big blue marlin, feeding on the edge of the continental shelf, sights a squid dropping through the water column. What’s actually a squid-baited hook – just one of a thousand or more like it, hanging from a 30-plus mile mainline set by a commercial longliner plying the blue waters of the Atlantic Ocean – is meant for a swordfish. But the hungry marlin doesn’t know that. Neither does the bluefin tuna, the hammerhead shark, the loggerhead turtle, and innumerable other ocean creatures, many prohibited or endangered species, that make up the unwanted “bycatch” of longlining. The marlin swallows the squid. She runs, she dives, but she’s caught. And she won’t be cut loose for up to 10 or 12 hours, when the vessel’s crew hauls back the long, long line. By then it’s too late, the fish is dead. Chalk it up as collateral damage, part of the cost of doing business with longlines.

Now imagine...

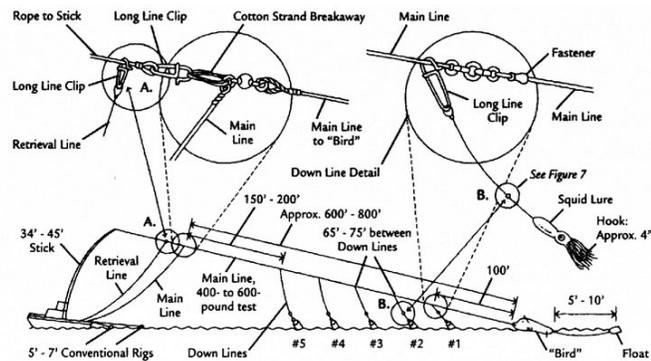
The same commercial fishermen quit longlining for a new way of catching swordfish. They set a very short mainline with one or two branch lines descending, attached to a buoy. There may be a dozen such “buoy-gears” set, with no more than 2 hooks per buoy. The fishermen actively tend the gear so they can retrieve it as soon as the buoy signals that the bait’s been taken. Over 90% of what they catch is swordfish. If a juvenile sword or a non-target species is hooked, it can be released soon after, alive. But blue marlin, turtles, bluefin tuna and other vulnerable species are rarely if ever caught.



The gear is called **swordfish buoy-gear**, and it was developed by commercial fishermen on the east coast of Florida after longlines were banned there over a decade ago. It's now being tried all around the U.S. coast and overseas, where the U.S. government is promoting its use by developing countries.

The future belongs to safer, more selective, more sustainable fishing methods that are not only friendly to the environment, but friendlier to fishermen and fishing communities, too. Actively fished gears like buoy-gear provide fresher, higher quality swordfish, too. (Florida fishermen are working with retail chains, like Whole Foods, to get higher prices for their "sustainable" product.) Fishermen want efficiency? Catch rates with buoy-gear come in at 300+ swordfish per 1,000 hooks vs. only 8 swords per 1,000 hooks on longlines.

Similarly, fishermen on the U.S. east coast are using what is called **green-stick gear** to catch yellowfin tuna, but it can also be used to catch bigeye, albacore, skipjack and bluefin tuna. The rigs consist of one or more 30-foot long poles mounted to the deck of the boat, each towing a main line with no more than 10 hooks attached. Each hook can be retrieved independent of the others, so that when a fish takes the bait, it can be retrieved while the other hooks continue to fish. It is then re-baited and put back to work.



Summary

The use of pelagic longlines should not be an option for sustainable commercial fisheries because of the irresolvable bycatch problems associated with this indiscriminate gear. The only ones who think longlines can be sustainable are too narrowly focused; either on maximizing catches of swordfish and tuna, without regard for the impact on other species; or concerned only with the "take" of marine mammals or seabirds, whose capture may be mitigated with modifications that unfortunately do little to protect other vulnerable species, especially finfish.

Managing large-scale, indiscriminate gears like longlines is extremely complicated and costly, from an economic as well as an environmental standpoint. Trying to conserve and protect swordfish, marlin, sharks, tunas, dolphin-fish, turtles, marine mammals and sea birds – targeting some, trying to avoid others; species in varying conditions from abundant to endangered and everything in between; with very different management goals and regulations for each – is the fisheries management equivalent of playing *Wack-a-Mole*.

Fortunately, there are economically-viable alternatives. Best fishing practices can support small-scale, high-yield, locally-supplied fisheries, commercial as well as recreational, using the latest technological developments in sustainable fishing. It is part of a progressive shift away from so-called modern, “efficient” methods of fishing that are wasteful and ultimately unmanageable.

Fishermen want to fish, consumers want local, fresh seafood caught in an environmentally-responsible way. Safe, sustainable fishing for big ocean fish is a win-win for everyone.



Regulation of Pelagic Longlines

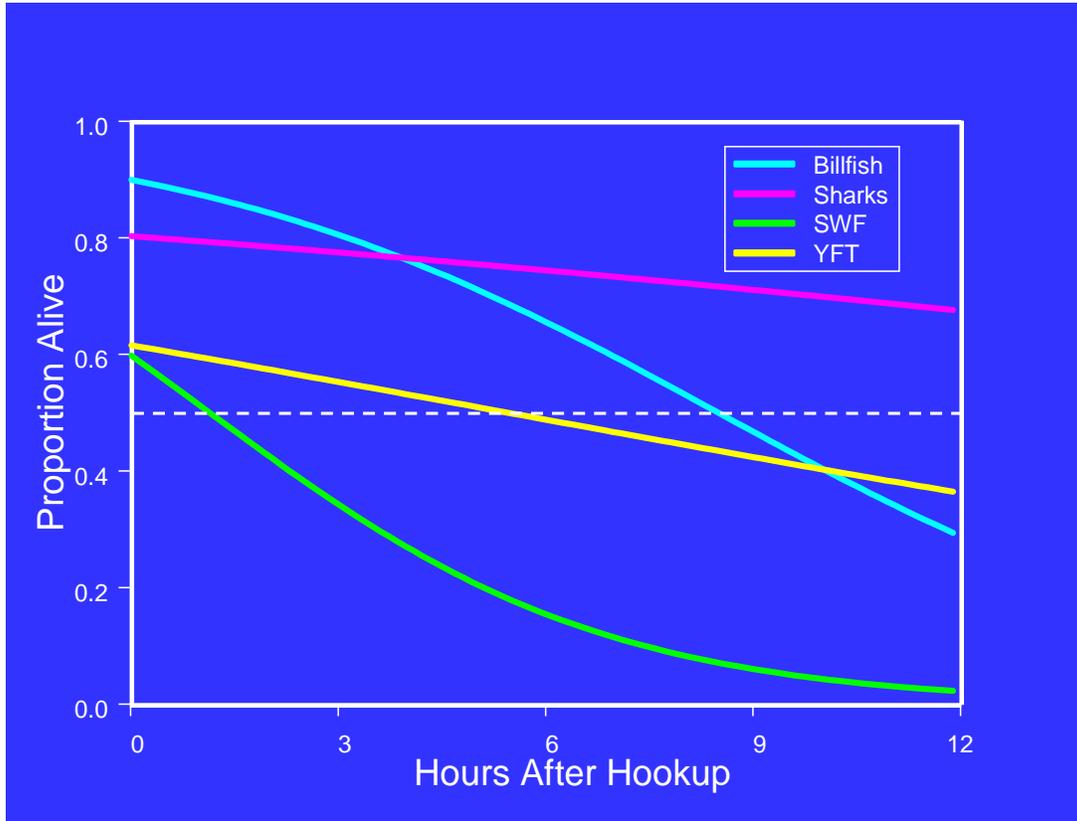
Wild Oceans Recommendations (Source: Ocean Roulette, 1998)	Subsequent Action Taken (as of 2013)
Establish No Longlining Zones in Known Nursery and Spawning Areas...to protect juvenile swordfish, billfish, sharks and bluefin tuna	In 2000, in response to a lawsuit, the National Marine Fisheries Service closed 133,000 square miles of Atlantic and Gulf of Mexico waters closed to longlining. Federal waters off the West Coast (200 mile EEZ) were closed to longlines by the Pacific Council in 2004. Additional Atlantic and Gulf closures were proposed by NMFS in 2013.
Require That Longline Vessels Be Equipped with Vessel Monitoring Systems (VMS) to Ensure Compliance with Area Closures	Since 2003, NMFS has required that approved VMS be installed and operating on all U.S. pelagic longline vessels fishing in the Atlantic.
Seek Closures in International Waters	The U.S. delegation to ICCAT has asked the commission's scientists to study the potential of time-and-area closures on the high seas to aid rebuilding of swordfish and blue and white marlin.
Count Dead Discards Against All U.S. Commercial Quotas...as an incentive to avoid bycatch	Longline dead discards are now deducted from total allowable catch allowances for swordfish, bluefin tuna and large coastal sharks.
Require the Use of Breakaway Gear to Avoid Capture of Giant Bluefin Tuna	NMFS now recommends that longliners fishing in the Gulf of Mexico use "weak hooks" to minimize capture of large spawning bluefin tuna.
Limit Length of Longline Gear and Soak Time	The NMFS west coast region is currently studying the feasibility of limiting soak times to enhance survival of incidentally-caught fish.
Research Alternative Gears	NMFS is conducting pilot programs in the Gulf of Mexico testing swordfish buoy-gear and green-stick gear for yellowfin tuna. It is also funding Pflieger Institute for Environmental Research experiments with deep-set buoy-gear off the California coast.

Effectiveness of Atlantic Coast Longline Area Closures

	Swordfish	Pelagic Sharks	Blue Marlin	White Marlin	Sailfish
Pre-Closures (1997-99)	21,519	52,093	1,621	1,973	213
First 3 Years of Closures (2001-2003)	13,240	23,017	815	1,045	139
% Bycatch Reduction	-38.5	-55.8	-49.7	-47	-74.6
Closures Plus Circle Hooks (2005-2010)	9,429	30,193	635.8	771.2	197.5
% Bycatch Reduction	-56.2	-42	-60.8	-60.9	-68.3

NOAA Fisheries HMS SAFE Report 2011

Bycatch Mortality Increases Significantly After Several Hours On a Multi-Mile Pelagic Longline (Even Using Circle Hooks)



Berkeley & Edwards 1998