



The NCMC

MARINE BULLETIN

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OUT OF BOUNDS

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With a life cycle that extends from freshwater rivers to the ocean, saving river herring and American shad will require expanding the traditional boundaries of fishery management

Fishermen up and down the Atlantic Coast eagerly await spring spawning migrations of river herring and American shad. They know that once these prey fish arrive, prized game fish such as striped bass and bluefish will not be far behind. For the bounty they bring to fishing communities, shad and river herring runs were once a time of celebration. Now communities anxiously follow the counts of returning fish, hoping that maybe this is the year the numbers stop falling and recovery is on its way.

River herring landings have plummeted a startling 90% over the last 23 years, prompting the National Marine Fisheries Service to list both blueback herring and alewife as "Species of Concern" in 2006. Species of Concern designation highlights the need for management intervention to prevent the species from being listed as threatened or endangered under the Endangered Species Act. North Carolina is the fourth state to close directed river herring fishing since 2002. (Moratoriums have also been enacted in Connecticut (2002), Massachusetts (2005), and Rhode Island (2006).) American shad are fairing no better. A 2007 stock assessment concluded that American shad

stocks are at historic "all-time lows."

The Atlantic States Marine Fisheries Commission (ASMFC) coordinates management of shad and river herring in state waters (out to 3 miles from shore). Yet as adults, river herring and American shad spend most of their lives at sea in federal waters (between 3-200 miles from shore), only traveling to inland river systems to spawn.

In March 2009, the ASMFC released a report on diadromous fish habitat, which included detailed chapters for alewife, blueback herring, and American shad. The habitat report identifies offshore areas, including the Gulf of Maine, Georges Banks, and the Mid-Atlantic Bight, where stocks of these species are known to mix during winter and summer. These areas are also important fishing grounds for commercial trawlers targeting small-mesh species such as Atlantic sea herring and mackerel, and it is no surprise that this is where fishing mortality takes its greatest toll on shad and river herring populations when they are caught as bycatch.

Recent studies estimate that bycatch mortality of river herring is twice as high as the annual coastwide landings for commercial river herring fisheries operating in state waters.¹ This estimate

¹ Cieri, Matthew, Biologist for the Maine Division of Marine Fisheries, in a presentation to the Working Group of the ASMFC Shad and River Herring Management Board, February 27, 2009.

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FAIR PREY

Accounting for natural predation in the management of forage fish, above all to ensure sufficient prey are left for predators, is hindered by a widespread lack of understanding among many fishery managers - and not a few scientists - about how we estimate natural mortality in our traditional stock assessments and how weak those estimates really are.

Knowing the amount of non-human predation on a wild population of fish is key to any stock assessment, but vitally important for mid-trophic level forage species like herring, mackerel and menhaden. It is also the most difficult parameter to measure. By comparison, estimating fishing mortality, both fish caught and those discarded at sea, is a snap. Which, of course, it is not.

As we propose a more precautionary approach to setting allowable catches for prey fish, we have challenged the claim, made by fishery management bodies in defense of current allocations to industrial forage fisheries, that by estimating natural mortality they are considering predator needs. Overcoming this misconception has been one of the biggest stumbling blocks in the way of taking an ecosystem-based approach to conserving forage fish. Fortunately, recent scientific research looking into just this question is now helping to break this impasse and pointing assessment scientists and fishery managers in a new, helpful direction.

THE NUMBER M

Total mortality on a fish population is the sum of fishing mortality, usually expressed as a rate and denoted as F , and the natural mortality rate, or M , which is assumed to be mostly due to predation. M is rarely calculated; instead, it is a textbook guesstimate based on life history characteristics of the species, or even rates already used for similar fish, and assumed to be constant over time. Which, of course, it is not.

Two peer-reviewed studies produced by the NMFS Northeast Fisheries Science Center's Food Web Dynamics Program—Overholtz et al 2008 and Moustahfid et al 2009 - clearly point out that our traditional stock assessments do not accurately account for predation. In the cases of Atlantic herring and mackerel, respectively, they conclude that the natural mortality rates used, along with the assumption that they are constant, underestimate the population size needed to sustain both predators and fishing and may overestimate the amount of fish that can be safely allocated to the fisheries.

The authors further point out that these assessments do not account for increasing prey demands as predatory fish stocks in the northeast and mid-Atlantic regions recover from overfishing and, as such, catch allocations based on these assessments could result in unanticipated declines in prey stocks or inhibit recovery of predators by depressing the forage base.

Devising new ecosystem models to explicitly account for the dynamic nature and needs of predator populations is complicated. But knowing the risks associated with our current approach, our charge is simple. Maintain forage fish populations at significantly higher levels and fish them much more conservatively.

Ken Hinman, *President*

NATIONAL COALITION FOR MARINE CONSERVATION

Founded in 1973

The NCMC is a 501(c)(3) non-profit organization dedicated to the following goals:

- ◆ preventing overfishing and restoring depleted fish populations to healthy levels
- ◆ promoting sustainable use policies that balance commercial, recreational and ecological values
- ◆ modifying or eliminating wasteful fishing practices
- ◆ improving our understanding of fish and their role in the marine environment
- ◆ preserving coastal habitat and water quality.

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does not include the large number of unclassified herring and shad that are observed as bycatch each year. From 2007-2008, “unidentified herring and shad” bycatch outnumbered confirmed bycatch of American shad, hickory shad, alewife, and blueback herring combined 7:1.²

In fact, the ASMFC 2008 River Herring Stock Status Report found two clear coastwide trends in both alewife and blueback runs: 1) mean lengths of males and females have declined in nearly all rivers examined; and 2) except for Maine rivers, the maximum age of males and females is one or two years lower than historical observations. Truncation of maximum age indicates heavy mortality (overfishing) of adults; indeed, the stock status report concludes that adult river herring mortality is twice as high as it should be. This coastwide trend likely indicates the source of mortality at sea, where stocks from individual river systems mix.

Though a significant source of fishing mortality, at-sea bycatch of river herring and shad falls into a gray area between state (ASMFC) and federal fisheries management

² Northeast Fisheries Observer Program 2009. Standardized Bycatch Reporting Methodology: Annual Discard Report.

(the New England and Mid-Atlantic Fishery Management Councils), with neither side eager to take the lead in addressing the issue.

ASMFC WORKING GROUP DROPS THE BALL ON AT-SEA BYCATCH

In response to the shad and river herring declines, the ASMFC initiated amendments to its Interstate Fishery Management Plan (FMP) for Shad and River Herring. Amendment 2 (river herring) was launched in 2007. Amendment 3 (American shad) was initiated a year later to address the alarming findings of the latest stock assessment.

Draft Amendment 3 describes at-sea bycatch monitoring programs that all states must adopt for American Shad. The American shad amendment is scheduled to be released in May 2009 for public comment. Draft Amendment 2, which has already undergone public comment and state hearings, goes a step further with strong alternatives to regulate at-sea bycatch of river herring, including mandatory monitoring programs, bycatch caps, landings limits, and reporting – all of which are within the jurisdiction of ASMFC and

(Continued on page 4)

LOBBING BLAME AT PREDATORS

Predation is often fingered when fishery managers are debating the cause of American shad and river herring declines. One frequently cited study concluded that increases in the striped bass population are the primary cause of dwindling American shad and river herring runs in the Connecticut River.¹ These findings are not unexpected. River herring and shad are forage fish – important prey for a host of predators including striped bass. Predation is likely a major component of mortality in all river systems and at sea. In an unfished ecosystem, predator and prey populations achieve equilibrium. In other words, predators do not outgrow their food base, and prey populations fluctuate around a sustainable level. Problems arise when fishing mortality reduces a prey resource to a level that can no longer withstand natural predation.

The predation argument is often used as an excuse for inaction. Why curb fishing and bycatch mortality if predators are the reason for river herring and shad declines? Those who make this argument suggest that we must cull the striped bass population if we expect to restore river herring runs. They point to striped bass as the culprits instead of acknowledging that it is the complacency with status quo, single-species management that prevents managers

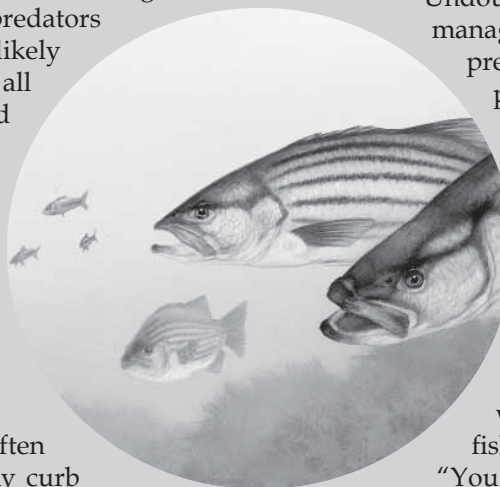
¹ Savoy, T.F. & V.A. Crecco. 2004. Factors affecting the recent decline of blueback herring and American shad in the Connecticut River, American Fisheries Society Monograph.

from moving forward with ecosystem-based management approaches to protect predators and their prey. We have not “overbuilt” striped bass. In fact, after many years of recovery, striped bass populations are declining again. Striped bass natural mortality has risen because of a deadly disease that is attacking fish weakened by malnutrition.²

Undoubtedly, it is important for fishery managers to have a better understanding of predation, especially the major predator-prey interactions that comprise an ecosystem’s food web. But to suggest that managers could manipulate one predatory species in a complex food web to directly influence the abundance of a prey species is hubris. If striped bass were removed, another predator like bluefish would move in to take their place. In arguing for the ASMFC River Herring working group to focus its attention on fishing mortality, one member observed, “You control the mortality you can control and hope it makes a difference.” Trouble is the

ASMFC is now on a path to relinquish most of that control to the discretion of the federal councils.

² Recent stock assessments in Chesapeake Bay indicate that non-fishing mortality in striped bass has increased since 1999, concomitant with very high (>50%) prevalence of visceral and dermal disease caused by *Mycobacterium* spp. [D. T. Gauthier, R. J. Latour, D. M. Heisey, C. F. Bonzek, J. Gartland, E. J. Burge, W. K. Vogelbein. 2008. Mycobacteriosis-associated Mortality in Wild Striped Bass (*Morone saxatilis*) from Chesapeake Bay, USA. Ecological Applications: Vol. 18, No. 7, pp. 1718-1727.]



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State responsibility. Nearly all comments received during the Amendment 2 public comment period - over 4,000 individuals and 100 organizations from states all along the Atlantic seaboard - expressed support for these measures.

Amendment 2 was to be finalized at a meeting of the ASMFC Shad and River Herring Management Board in February 2009, but instead the Board chose to postpone the decision until May 2009 and appoint a working group for the purpose of developing more detailed options. NCMC Executive Director Pam Gromen urged the Board not to delay action. "I just want to remind the Commission that Amendment 2 was initiated in advance of the 2012 stock assessment because of the dramatic declines in commercial in-river landings and that the alternatives in the amendment rightly focus on what you can control now, which is reducing fishing mortality, both bycatch and directed," she said.

Even with a clear recommendation from the Shad and River Herring Technical Committee (a body comprised of state fisheries biologists) to investigate and regulate at-sea bycatch, the river herring working group chose to drop all bycatch alternatives in Amendment 2, focusing instead on further cutbacks to directed in-river fishing. The working group felt that the bycatch monitoring and regulation measures would set a precedent of the ASMFC indirectly regulating federal fisheries. A "strongly-worded letter" would be sent to the New England and Mid-Atlantic Councils requesting their voluntary cooperation.

THE BALL'S IN YOUR COURT

Despite communications from the ASMFC and concerned environmental groups requesting assistance with river herring recovery, the Mid-Atlantic Fishery Management Council is putting its finishing touches on an Atlantic mackerel amendment without pausing to discuss potential alternatives to address the significant bycatch of blueback herring in this fishery.³ Amendment 11 to the Atlantic Mackerel, Squid, Butterfish FMP is expected to be submitted to the Secretary of Commerce for approval later this year.

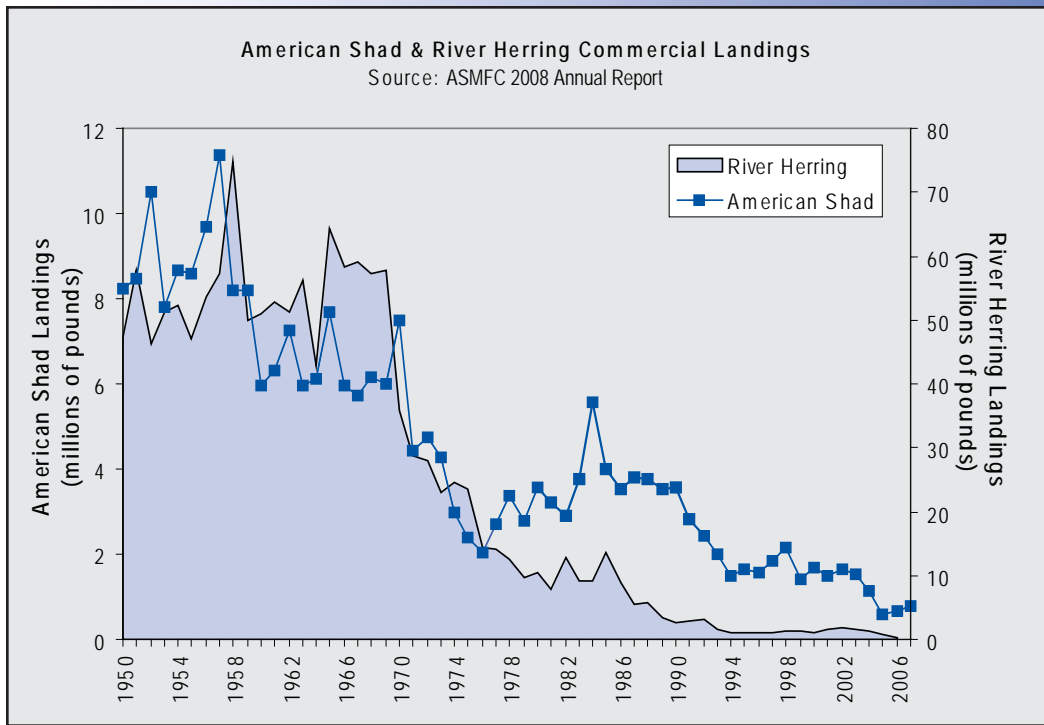
However, the New England Fishery Management Council (NEFMC) has taken the initiative and identified river herring bycatch as a priority for Amendment 4 to the Atlantic Herring FMP, which is scheduled for completion in 2011. The primary objective of Amendment 4 is a fishery monitoring program that will facilitate accurate and timely estimates of all landings and discards, including river herring, in the Atlantic herring fishery. In addition, time/area closures of river herring bycatch hotspots have been proposed as possible alternatives.

While promising, these alternatives are still under development -far from a sure-thing. Even the monitoring

3 The Northeast Standardized Bycatch Reporting Methodology Amendment reports that the Mid-Atlantic mid-water trawl fleet lands 250,000 pounds of blueback herring bycatch annually. The figure does not include discards. Harrington et al. 2005 estimated the total blueback herring bycatch in the Atlantic mackerel fishery in 2002 at over 18 million pounds. [Harrington, J.M., R. A. Myers, and A. A. Rosenberg. 2005. Wasted resources: bycatch and discards in U. S. Fisheries. Prepared by MRAG Americas, Inc. for Oceana.]

Players Involved in Shad and River Herring Management

Agency	Responsibility	Action Needed
Atlantic States Marine Fisheries Commission	Coordinates management in state waters ranging from river systems out to 3 miles off the coast	Comprehensive dockside bycatch monitoring program that is required for all states with small-mesh fisheries operating in river herring/shad grounds; establish a maximum level of allowable at-sea bycatch to be implemented by the Secretary of Commerce and the National Marine Fisheries Service
Secretary of Commerce	Responsible for ASMFC-compatible management action in federal waters (3-200 miles off the coast)	Coordinate an action plan to address river herring and American shad bycatch between the ASMFC, NMFS, and the New England and Mid-Atlantic federal councils
New England Fishery Management Council	Oversees Atlantic Herring Fishery Management Plan (FMP) - responsible for minimizing bycatch in this fishery	Incorporate river herring into Atlantic Herring FMP as non-target stocks in the fishery; establish bycatch caps and accountability measures to ensure caps are not exceeded; enact time/area closures for river herring bycatch hotspots
Mid-Atlantic Fishery Management Council	Oversees Atlantic Mackerel, Squid and Butterfish Fishery Management Plan (FMP) - responsible for minimizing bycatch in these fisheries	Incorporate river herring into Atlantic Mackerel, Squid, Butterfish FMP as non-target stocks in the fishery; establish bycatch caps and accountability measures to ensure caps are not exceeded; enact time/area closures for river herring bycatch hotspots
National Marine Fisheries Service (NMFS)	Manages at-sea observer program which documents bycatch (both landed and discarded) in federal fisheries	Comprehensive at-sea observer program that allows for accurate estimation of river herring and shad bycatch



river herring populations all along the coast, and it must take the reins and lead cooperative efforts with the National Marine Fisheries Service and the federal councils. At the same time, the ASMFC should initiate an assessment of the coastal forage base as a whole to determine if there is adequate prey available to maintain or rebuild populations of dependent predators like striped bass, bluefish, and weakfish. (See Box “Lobbing Blame at Predators,” page 3) Building up alternative prey sources such as menhaden as opposed to reducing predator populations should be investigated as an option for reducing predation mortality on severely depleted river herring and shad.

program part of the Atlantic herring amendment is still the subject of some controversy. At the March 24th meeting of the NEFMC Atlantic Herring Oversight Committee, a memo distributed to committee members poses the question, “Would it be possible for the Council to delegate the dockside monitoring program to the States through the ASMFC FMP for Atlantic herring?” One committee member requested that a letter be sent to the ASMFC asking about the feasibility of a state-run monitoring program.

So while the ASMFC and the federal councils exchange letters and volley for who ultimately will be responsible for monitoring and regulating river herring bycatch, at-sea bycatch mortality – the largest source of mortality these fishery management bodies can control – continues unabated, and river herring continue to decline.

ESTABLISHING A NEW PLAYING FIELD

Given the downward trajectory of landings (See “American Shad & River Herring Commercial Landings” graph above), action to monitor and regulate at-sea bycatch is needed now. River herring, American shad and the predators and fishermen that depend on them cannot wait years for the federal councils to take action, if they choose to take action at all. Some runs have already dwindled to single and double digits in terms of the number of individuals returning to spawn.⁴

In the absence of a federal fishery management plan for shad and river herring, the Secretary of Commerce is the ultimate authority for managing these stocks in federal ocean waters. For the Secretary of Commerce to step in and take action, the ASMFC must make the strongest statement possible that reducing bycatch is essential to rebuilding

4 In 2006, the North Carolina Wildlife Resources Commission reported that only 18 river herring were counted in the Cape Fear River. In 2005, only 4 river herring were counted in the Susquehanna River in Pennsylvania. 75 river herring were reported in the Connecticut River in 2008.

Ultimately, American shad and river herring recovery depends on a comprehensive plan that bridges state and federal management. As a first step, federal management must be made official by adopting these species as non-target stocks in federal fisheries where they are regularly encountered as bycatch, as advised by the new National Standard 1 (NS1) Guidelines supporting the Magnuson-Stevens Reauthorization Act (MSRA) - our nation’s most important fishing law.

In 2006, the MSRA set new standards for preventing overfishing by requiring annual catch limits (ACLs) and accountability measures (AMs) be established for federally-managed species. The NS1 Guidelines provide advice to the federal councils for defining stocks in a fishery, including non-target stocks that are captured unintentionally, and are either landed and sold or are in need of conservation due to overfishing. In the case of river herring or shad, the ACL would be a bycatch limit. If the bycatch limit is reached, the directed fishery (e.g., the Atlantic herring or Atlantic mackerel fishery) would close down. Accountability measures (AMs) would necessitate increased observer coverage onboard fishing vessels, as well as mandatory bycatch reporting requirements to ensure the ACL is not exceeded.

The deadline for federal fishery management councils to complete ACLs and AMs for their fisheries is 2011, and the process is well underway at the New England and Mid-Atlantic Fishery Management Councils, with draft amendments expected in late 2009 and early 2010. To date, the Councils have expressed little interest in incorporating non-target stocks into their management plans. But NCMC, the only organization actively following the issue at both Councils and at the ASMFC, will continue to work to make sure river herring and American shad do not fall through the cracks. □

PACIFIC COUNCIL VOTES NO ON HIGH SEAS LONGLINING

Big Fish, Turtles Get a Reprieve

The Pacific Fishery Management Council voted to uphold a ban on longlining on the high seas off the west coast, possibly putting an end to the issue of re-opening the eastern Pacific to longlines. Pelagic or drift longlining, whether for swordfish or tuna, employs multi-mile mainlines baited with hundreds of hooks that catch scores of different pelagic species indiscriminately.

The action came at the council's April meeting, as members debated alternatives laid out in Amendment 2 to the Fishery Management Plan for West Coast Fisheries for Highly Migratory Species (tunas, billfish and sharks). Three of the proposed amendment's alternatives authorize a fishery for swordfish, allowing up to 20 or more west coast-based longliners to operate beyond the United States 200-mile zone (EEZ). These alternatives are backed by the council staff, the National Marine Fisheries Service (NMFS), the council's HMS Management Team and industry advisory panel. But by a narrow 7-5 margin, the council opted to stay with the status quo, which maintains the current prohibition on longlining, in effect since 2004 because of the threat to the survival of endangered sea turtles. (*Warning:* NMFS, which has been aggressively promoting a longline fishery, both inside and outside the EEZ, told the council it would provide them with new information supporting the Amendment and ask for re-consideration at a future meeting.)

The National Coalition for Marine Conservation (NCMC) submitted written comments and attended the meeting, held near San Francisco, to testify against authorizing a longline fishery. In our testimony, we expressed concerns about the impact of longlining on leatherback and loggerhead sea turtles, both listed under the Endangered Species Act (ESA), but also raised concerns about the impact on non-target fish. By the council's own estimation, although the target species would be swordfish, at least 28 non-target species are likely to be taken as bycatch in a longline fishery, a number of which are already subject to overfishing, in an overfished condition, or whose status is unknown.

TREATING TURTLE TAKES LIKE A "QUOTA"

The proposal to open the high seas beyond the U.S. EEZ to a west coast-based longline fishery is predicated on implementation of new fishing methods - the use of circle hooks and mackerel-type bait, as now used in the Hawaii-based longline fishery - aimed at reducing the take of sea turtles. The Hawaiian fishery, which operates in the North Pacific, was re-opened in 2004 using the new hook/bait combination and with limits on the number of sets and take caps for leatherback and loggerhead turtles. If either is reached, the fishery closes. The fishery has averaged 12 turtles a year since then, took 20 in 2006, and is allowed up to 33 turtle takes combined in a given year, under the plan

devised by the Western Pacific Council and approved by NMFS.

The likelihood of additional mortality of endangered leatherbacks and threatened loggerheads in a west coast-based longline fishery, we told the Pacific Council, is reason enough to continue the prohibition on longlining. Turtle take caps were not delineated in Amendment 2, but instead would be evaluated subsequent to approval of the fishery and established subject to a new analysis - called a Biological Opinion - performed by NMFS as required by the ESA.

"This approach suggests fishery managers are treating turtle takes as an allowable catch, with a quota, rather than as an outcome to be avoided," NCMC president Ken Hinman told the council. "You are working backward from an *a priori* determination to establish a fishery and later determine how to accommodate it under the ESA."

The substantial Hawaii longline fishery was permitted to resume without coordination between the Western Pacific and Pacific Councils in developing their respective plans and thus without accounting for the potential additional impact of a west coast-based fishery on the high seas. Nor does the proposal account for the possibility of re-opening the west coast EEZ to longlining, which the council is also proposing under a separate action (an experimental fishing permit to test the viability of a swordfish longline fishery within 200 miles of the coastline). "This *ad hoc* allocation of turtle takes to accumulating longline effort undermines the intent of the ESA along with the public's confidence in the process," said Hinman.

A LONGLINE FISHERY WILL CONTRIBUTE TO OVERFISHING

The way the Amendment treats the potential impact of the high seas longline fishery on finfish is equally disturbing. Amendment 2 acknowledges an increase in mortality on a number of species that are already subject to overfishing or in an overfished condition, among them North Pacific albacore, bigeye tuna, striped marlin, bluefin tuna, yellowfin tuna and shortfin mako shark. (see Conservation Concerns, page 7)

Projections of the actual increase in catch of these species are highly uncertain, given that they are bycatch species taken incidentally and that the controls on the fishery contained in Amendment 2 are not designed to affect the catch of non-target fish. As Amendment 2 points out, "(n)o controlled experiments have been conducted in the Hawaii fishery to determine if the use of circle hooks and mackerel bait results in different CPUEs (catch rates) for finfish in comparison to J-hooks and squid bait." In fact, catch rates for two important west coast species, striped marlin and shortfin mako shark - have increased in the Hawaii-based

fishery, marlin slightly and mako by three-fold.

Amendment 2 dismisses these “conservation concerns” by arguing that a) the expected increase in U.S. catch is a small portion of the total catch from the stock in question, and b) it is the responsibility of international agencies, such as the Inter-American Tropical Tuna Commission (IATTC) and Western & Central Pacific Fisheries Commission (WCPFC), to set limits on these highly migratory species, not the U.S.

But clear concerns about the status of these fish, the need for conservation measures, and the inability in most cases of international bodies to adopt them make the proposal’s indifferent attitude troubling, to say the least, and presents an approach to conserving shared, highly migratory species that inevitably resigns these resources to mutually assured destruction.

THE RIGHT DECISION

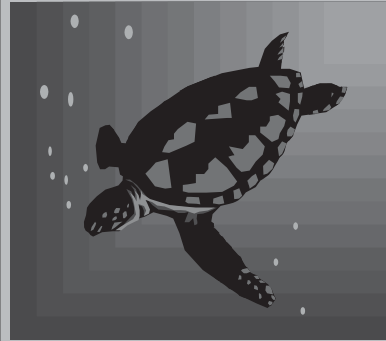
To say that the expected increase in U.S. catch of any one species is a small part of the total catch is irrelevant for species that are overfished or for which overfishing is occurring. An increase in catch will increase overfishing. Secondly, to declare that the U.S. strategy for ending overfishing is to seek international measures through the IATTC and WCPFC, but that in the absence of such catch restrictions the U.S. will unilaterally increase its catch, is irresponsible. What it boils down to is this: because the U.S. alone cannot prevent overfishing, it is okay for us to take action that not only contributes to it, but actually promotes it.

Just as conserving a highly migratory species is a shared responsibility, overfishing is a cumulative effect. If a species is overfished or near that condition, as are a number of those species that will be taken in a high seas longline fishery, every nation fishing that stock has the responsibility not to increase fishing mortality at least until international measures are in place that would specifically permit it. If all nations fishing these stocks take the attitude reflected in Amendment 2 - that is, unilaterally increase fishing pressure while awaiting multi-lateral action - overall fishing mortality will substantially increase and international conservation of highly migratory species in the Pacific will be too little, too late.

“Make no mistake,” NCMC’s Hinman warned the council. “The day will come when the U.S. and other fishing nations are asked to limit their catch of a range of Pacific highly migratory species, because overfishing is likely to continue on these species for the foreseeable future. When that day comes, you will find, as others have before you, that implementing conservation measures on non-target species in a longline fishery is costly, time-consuming and, ultimately, next to impossible.

“The Council will be confronted with controlling the bycatch, not just counting it. The only measure that has worked for a wide range of species has been area closures - taking the gear out of the water where and when it is doing the damage. But you’ve already done that. You made the right decision the first time.” And the council made the right decision again in April. NCMC will continue to monitor events on the west coast to make sure that decision stands. □

CONSERVATION CONCERNS



A high seas longline fishery based on the west coast would take endangered sea turtles as well as a significant bycatch of non-target tunas, billfish and sharks, many of them fully- or over-exploited. Among the species of concern identified in the Pacific Council’s

Amendment 2, and their conservation status as cited in the document, are:

- **Albacore:** “...fishing mortality is higher relative to most commonly used reference points, leading to a concern that overfishing could occur. Both the IATTC and WCPFC have passed resolutions calling on nations not to increase fishing effort on this stock.”
- **Bigeye Tuna** – “NMFS declared the stock subject to overfishing in 2004...(The Council’s) strategy principally relies on making recommendations, through the U.S. delegations to the IATTC and WCPFC, on measures that would end overfishing...the IATTC has so far been unable to adopt such conservation and management measures.”
- **Striped Marlin** – “...the stock is depleted. In 2007 and 2008 the ISC plenary recommended that ‘the fishing mortality rate of striped marlin should be reduced from the current level...the fishing mortality rate should not be increased.’”
- **Shortfin Mako Shark** – “The IUCN lists this species as “Near Threatened.”
- **Bluefin Tuna** – “Fishing mortality likely exceeds the rate predicted to produce maximum yield per recruit (ISC 2008). In 2008 the WCPFC considered a conservation and management measure calling on nations to not increase fishing effort on this stock but did not adopt it.”
- **Yellowfin Tuna** – “Based in part on previous stock assessment results from the IATTC, NMFS declared that overfishing is occurring on this stock. In accordance with the MSA, in March 2007 the Council provided recommendations to NMFS and Congress on measures to end overfishing on this stock. Such measures would have to be implemented through the IATTC. To date the IATTC has been unsuccessful in adopting conservation measures to end overfishing on this stock.”



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