



## Mid-Atlantic Fishery Management Council

800 North State Street, Suite 201, Dover, DE 19901  
Phone: 302-674-2331 | FAX: 302-674-5399 | [www.mafmc.org](http://www.mafmc.org)  
Michael P. Luisi, Chairman | G. Warren Elliott, Vice Chairman  
Christopher M. Moore, Ph.D., Executive Director

March 30, 2020

Maria Fenton  
Sustainable Fisheries Division  
Greater Atlantic Regional Fisheries Office, NMFS  
55 Great Republic Drive  
Gloucester, MA 01930

Dear Ms. Fenton:

The responds to Sarah Bland's letter regarding the application for an Exempted Fishing Permit (EFP) requested by mid-water trawl Atlantic herring vessels.

On behalf of the Mid-Atlantic Fishery Management Council, I support the issuance of an EFP to the applicant, i.e., mid-water trawl Atlantic herring vessels. GARFO is developing an EFP to further evaluate how to best implement a permanent electronic monitoring (EM) and portside sampling program in the Atlantic herring fishery to fulfill the requirements of the New England Industry-Funded Monitoring (IFM) Omnibus Amendment. Under this EFP, up to 12 midwater trawl vessels issued Category A or B limited access Atlantic herring permits would be required to run EM systems (video cameras and gear sensors) on 100 percent of declared herring trips during IFM years 2020-2021 (April 1, 2020 - March 31, 2022). EM data from 50 percent of the EFP trips would be selected for video review. Consistent trips would be selected for IFM coverage. Participating vessels would be subject to portside sampling trips that are selected for IFM coverage in lieu of at-sea monitoring coverage. The EFP would exempt participating vessels from the following regulations:

- IFM at-sea monitoring coverage requirements 50 CFR 648.11(m)(ii);
- Slippage definition at § 648.2 when a trip is selected for portside sampling and fish is discarded at the grate after sorting;
- Multispecies season and area restrictions at § 648.202(b)(1);
- Prohibition against fishing in a Northeast multispecies closed area without an observer on board at § 648.14(r)(2)(v); and
- Northeast multispecies closed area requirements at § 648.202(b)(2) and (4) when operationally discarding catch.

Please call or write if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "C Moore", is positioned above the printed name of the signatory.

Christopher M. Moore, Ph.D.  
Executive Director

CMM: mjs

cc: M. Luisi, W. Elliott, S. Bland