



April 4, 2018

Mid Atlantic Fishery Management Council
800 North State Street – Suite 201
Dover DE 19901

Attention: Chris Moore, Ph.D. - Executive Director

Re: Atlantic Mackerel

Dear Dr. Moore,

The American Bluefin Tuna Association (<http://www.theabta.com>) represents handgear fishermen who fish for Atlantic bluefin tuna. In 2017, 2,951 commercial permits, 3,618 charter/headboat permits and 20,338 recreational permits were issued by the Highly Migratory Species Management Division of NOAA. ABTA is actively involved in the international and domestic management of Atlantic bluefin tuna. Our commercial fishery is an open access fishery.

ABTA is also involved in the domestic management of forage stocks critical to our fishery including Atlantic Mackerel, Atlantic Herring and Atlantic Menhaden.

Importance of Atlantic Mackerel as forage for bluefin

Knowledge of the trophic role of Atlantic bluefin tuna (*Thunnus thynnus*) in marine food webs and its dependence upon Atlantic Mackerel is well documented and is based upon extensive sampling in the Bay of Biscay¹, Gulf of Maine², Gulf of St. Lawrence³, the

¹ Ortiz de Zatare, V., Cort, J., (1986) Stomach Contents Study of Immature Bluefin Tuna in the Bay of Biscay. ICES CM H:26, 10.

² Logan, J., Golet, W., Lutcavage M., (2014) Diet and condition of Atlantic bluefin tuna (*Thunnus thynnus*) in the Gulf of Maine, 2004-2008, Environmental Biology of Fishes, May 2015, Vol. 98:5,, pp 1411-1430

³ Vanderlaan, A., Hanke, A., Chasse J., Neilson J. (2013) Environmental influences on Atlantic bluefin tuna (*Thunnus thynnus*) catch per unit effort in the southern Gulf of St. Lawrence, Fisheries Oceanography, Vol, 23, Issue 1, Jan 2014

Eastern Mediterranean Sea⁴ and from historical sampling in the Norwegian North Sea⁵. Today, with the precipitous and sustained decline of abundance of Atlantic Herring due to harvesting pressure from industrial fishing targeting Atlantic Herring by midwater trawl gear, Atlantic Mackerel plays an even more crucial role in the diet of Atlantic bluefin tuna in U.S. waters. Therefore, of necessity, the U.S. Atlantic bluefin tuna fishery has become a stakeholder in the Atlantic Mackerel fishery.

Striking a critically important balance

Inherent in MAFMC's Ecosystem Approach to Fisheries Management Policy is the recognition that management of a forage species must include consideration of the needs of predator species. Therefore, a fishery management plan for a forage species that aims to achieve optimum yield but results in an inadequate forage base will deprive a fishery targeting a predator species of optimum yield. We need to find a way to support an adequate forage base in order to ensure ecosystem productivity with a view toward the achievement of optimum yield in the Atlantic Mackerel and Atlantic bluefin tuna fisheries, equally.

2017 Assessment

Importantly, the Assessment Review Committee stated that “..available evidence of predation was not sufficient to draw conclusions about the extent of predation on mackerel”⁶ and therefore it was not possible “to integrate the results into the stock assessment.”⁷ Clearly, this prioritizes research on predation by key, economically important species.

Draft Alternatives

Given the data available to us, Draft Alternative Option 3 seems to make the most sense. However, we would like to make the following comments:

1. Although the EAFM mandates maintenance of an adequate forage base, support for this does not appear to be reflected in any of the draft alternatives. We recognize that this issue is not part of the present discussion that, of necessity, must instead focus intently on the immediate problems of the 2018 fishery.

⁴ Karakulak, F., Salman, A., Oray, I. (2009) Diet composition of bluefin tuna (*Thunnus thynnus*) in the Eastern Mediterranean Sea, Turkey. J. Appl. Ichthyol. 25, 757-761

⁵ Mariani, P., Andersen, K., Lindegren, M., & MacKenzie, B. (2017). Trophic impact of Atlantic bluefin tuna migrations in the North Sea. ICES Journal of Marine Science, 74(6), 1552-1560. DOI: 10.1093/icesjms/fsx027

⁶ Boreman J., Cook R., Powers J., Stokes K. (2017) Benchmark Assessment for Atlantic Mackerel (SAW/SARC 64), Stock Assessment Review Committee Meeting, November 28-30, 2017, Northeast Fisheries Science Center, Woods Hole MA

⁷ Ibid.

Instead, going forward, we are looking for the earliest reasonable opportunity to incorporate considerations relating to Atlantic Mackerel's role as forage in the discussion.

2. ABTA's bluefin tuna commercial handgear fishery is an open access *artisanal* fishery, as defined by the UN FAO and by ICCAT. ABTA therefore supports other small-scale fisheries that have many of the attributes of our fishery (sustainable practices including limited harvesting capacity, negligible bycatch and zero impact on sea bottom). Equally importantly, some of our bluefin fishermen depend upon the open access Atlantic Mackerel fishery for income. Consequently, ABTA supports protecting the open access Atlantic Mackerel fishery.

In this connection, there is commentary in a memorandum found in the briefing documents for the upcoming meeting ("Mackerel Action; Framework Meeting 1") relating to "Within-Year DAH Usage" which states, "to further control landings, staff also suggests consideration of lowering the trip limit for incidental permits to 5,000 lbs once the (above) 85% or 80% trigger is hit". In our view, it would be desirable to preserve a higher trip limit of, say, 10,000 lbs, as compared with the recommended 5,000 lbs. Therefore, in order to enable this higher trip limit, we would urge the Council to consider a lower trigger such as 70%.

ABTA appreciates the opportunity to provide comment to the MAFMC on Atlantic Mackerel.

Cordially,

David Schalit, President
American Bluefin Tuna Association