

A Proposal to Develop an Accounting Program
from Atlantic Capes Fisheries, LaMonica Fine Foods, and Surfside Foods
to Address the Co-Mingling of Surfclams and Ocean Quahogs
During Either a Surfclam or Ocean Quahog Clamming Trip

The objective of the clam industry's proposal is to ensure accurate reporting of mixed catches of surfclams (SC) and ocean quahogs (OQ) in support of accurate compliance with quotas and in continuing support of stock assessments for both species.

This is a two-part process:

1. Preliminary estimates of mix catch composition will be made at sea using acceptable subsampling for the total catch. The vessel may separate at sea to the extent possible and to the degree that the plant can handle the second level of separation. Separation at sea is not mandatory and any separation at sea is at the discretion of the individual clam company. Clams separated at sea, when landed, will be tagged with species specific tags.
2. Final accounting will be made at the processing plant. The plant further separates what could not be separated on the vessel to have the most accurate landings of both SCs and OQs.

Since both clam species must be completely separated and processed individually, the accounting of both clam species at the processing plant reduces uncertainty in the number of SCs and OQs that are being landed.

In order to implement this industry two-step process of accountability, the existing regulations governing the catch and landings of SCs and OQs must be changed in the following manner:

1. There must be an allowance for the presence of both SCs and OQ, separately in cages or mixed in cages, aboard a clam vessel as long as the vessel is fully permitted to do so.
2. There must be an allowance for the transport and possession of both SCs and OQs separately, or in mixed clam cages, at the plant.
3. The enforcement mandate that not a single clam of one species be present in a cage of the other species must be eliminated.

This accounting proposal using plant records will be records for both enforcement and data reporting to NMFS.

If a SC tagged cage is documented at the plant to include X number of bushels of OQs, which will then become identified by an OQ tag at the plant, the holder of the SC tag on that original cage desires to be able to recoup the X number of bushels of SCs under a separate SC tag number on a future trip. The same would apply for SCs present in an OQ tagged cage.

From: [Joe Myers](#)
To: [Coakley, Jessica](#)
Cc: [Luisi, Michael](#); [Townsend, Wes](#); [Moore, Christopher](#); [Hughes, Peter B.](#); [Montanez, Jose](#)
Subject: advance comments from SWI - SCOQ Advisory Panel Meeting with FMAT
Date: Tuesday, January 24, 2023 4:27:46 PM

Dear Ms. Coakley,

On behalf of Sea Watch International, Ltd. and myself as an Advisory Panel member, we provide the following comments in advance of the Surfclam and Ocean Quahog Advisory Panel & FMAT Meeting on Thursday, January 26, 2023.

The objective that we share as a participant in the surf clam and ocean quahog fishery is to ensure accurate reporting of mixed catches of these two species of clams in support of accurate compliance with quotas and in continuing support of stock assessments for both species.

Sea Watch proposes accounting of mixed landings be made at the processing plant in the dealer report. The dealer report will be the record for both enforcement and data reporting to NMFS. Current market outlets for surf clams and ocean quahogs require that these species must be separated and processed as such. Accounting of both clam species at the processing plant aligns reporting to where adequate separation is most practically accommodated. Through implementation of this new accountability process, the existing regulations governing the catch and landings of surf clam and ocean quahog could then enable removal the prohibition and on mixed landings.

Sea Watch is also supportive of a process by which bushels recorded as landed commensurate with the declared trip that are subsequently reconciled at the plant to the commingled species, can be returned to the tagholder for use against future landings.

We believe that these proposed measures, as well as others that other industry participants will bring forth, provide greater catch certainty compared to the status quo, and are therefore a marked improvement in the management of the surf clam and ocean quahog fishery.

Sincerely:

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