

**EAST COAST SEAFOOD, LLC**  
**SEATRADE INTERNATIONAL**

November 14, 2023

Dr. Christopher Moore  
Executive Director  
Mid-Atlantic Fishery Management Council  
800 North State Street, Suite 201  
Dover, DE 19901

Re: Spiny Dogfish Quota 2024-26

Dear Dr. Moore:

I am the Chief Executive Officer of East Coast Seafood, LLC also known as Seatrade International. Seatrade is one of the original commercial dogfish processors and marketers of Spiny Dogfish dating back to the 1980's under the leadership of Steve Barndollar. I became affiliated with Seatrade in 1992 and have experienced the growth and slow demise of the industry. The industry has failed to attract any domestic interest in the species, the government has no purchase program, ocean carriers have refused to carry our cargo, governments have attempted to ban Spiny Dogfish, and there are fewer and fewer fishermen and offloaders with each passing season. To say the least, the fishery is very challenging.

As an original, and only remaining stakeholder in the sustainable certification of Spiny Dogfish, we are very supportive of sustainability measures. However, we need to keep in mind that we are protecting a predator and a nuisance fish formerly referred to as a "trash" fish, that if left unchecked will have a negative impact on North Atlantic fisheries. Nobody wants Dogfish to become extinct, but nobody should want the industry to become extinct either. The demise of the fishery will create new management concerns for the Councils as they attempt to find a way to compensate fishermen to harvest Dogfish to allow other species to flourish. Although dogfish is not a huge fishery, its extinction by implementing an unnecessarily low commercial quota would impact fishermen and fish houses from NH to NC, a New Bedford workforce, and many ancillary services including freezer, packaging, and transportation.

I do not believe that the science is as sound as the Science and Statistical Committee would have us believe. The Bigelow continues to fail to complete its surveys, observers tasked with measuring fish are spotty at best due to financial constraints, and the scientists are not surveying other areas like the Gulf of Maine. We hear from trawlers that vessels are forced to cut nets or move to in order to find targeted groundfish.

We recommend that the Dogfish committee put additional measures in place to increase the confidence in the science and Seatrade is pleased to assist in any way that we can. You should require additional surveys, including off the coast of Maine. The Committee should also require observers inspect dogfish one day per month at the only remaining production facility to measure fish, as this is the most efficient, cost effective and reliable means of completing this task. As previously mentioned, we are happy to make available our internal graded dogfish back reports that do not corroborate a measurable decline in the size of the species. We should work together on the possibility of a seasonal male dragger fishery to reduce the male population and sustain the industry. And jointly work on a government purchase program that will increase the price paid to fishermen.



**Salt & Sky**

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As far as the quota is concerned, we are not asking the Committee and Councils to ignore that science that has been presented but use its powers to adopt certain measures that will give the industry a fighting chance. First of all, you can adopt a projected discard of 2,134 MT. The Science and Statistical Committee claims with certainty that the ABC is 7,135 MT but that 2023 discard projection of 2,088 MT could be understated!?

Secondly, you can adopt a management buffer of zero, as there are inherent buffers built into the fishery. It's impossible to catch 100% of the quota, with the quota divided between the north and south and then subsequently divided again by state. It's unrealistic to think that each state will either catch or relinquish its entire quota. We have also heard that there is instability with the loss of the largest offloader in the South and uncertainty if there is going to be a successful successor. In addition, it's unlikely that we will catch the 2023 TAL of 5.449 MT. Because of the inherent buffer, we were never expecting to catch the quota and currently anticipating a 2023 harvest of ~4,700 MT, barely enough for the industry to survive. With a TAL of 4,852 I expect a final harvest in the vicinity of 4.300 MT. And this leads me to my final observation, doesn't the balance add to the 2024 buffer?

In summary, I am asking the Councils to make the best of a bad situation by using its available powers to maximize the 2024 harvest by minimizing discard projection, adopting a zero buffer and consider rolling over remaining quota.

I would like to thank all of the members and councils for their dedication and service to US fisheries.

Sincerely



Bob Blais  
Chief Executive Officer

Cc: Dr. Cate O'Keefe, Executive Director New England Fisheries Management Council  
Sonny Gwin, Chair Joint Spiny Dogfish Committee Mid-Atlantic Fisheries Management Council  
Nichola Meserve, Vice Chair New England Fisheries Management Council  
Eric Reid, Chair NEFMC  
Wes Townsend, Chair MAFMC