



Sea Watch International, Ltd.

8978 Glebe Park Drive ♦ Easton, MD 21601

410-819-8502 ♦ 800-732-2526

Fax: 410-822-1266

September 14, 2023

Ms. Jessical Coakley / Dr. Jose Montañez
Mid-Atlantic Fishery Management Council
800 North State Street, Suite 201,
Dover, Delaware 19901

Dear Ms. Coakley and Dr. Montañez,

Please accept these comments from Sea Watch International Ltd. and South Jersey Clam Company, Inc. regarding the proposed Atlantic Surfclam and Ocean Quahog (SCOQ) Species Separation Requirements Amendment in connection with the Surfclam and Ocean Quahog Committee and Advisory Panel Meeting on September 15, 2023.

Our view is that the core of this issue is one of mandating proper accounting for continued sound management of the fishery. This is not an issue of enforcing a specific approach to the physical act of sorting clams.

We maintain that the existing SCOQ Dealer Report is the mechanism to accomplish resolving this core issue. Acceptable accuracy and enforceability currently exists in the Dealer Report, and is widely mandated across a broad number of fisheries, including the SCOQ fishery.

The issue of mixed catches is centered on ocean quahogs landed in surf clam declared trips, predominantly in the mid-Atlantic. There is no incentive to underreport less valuable (than surf clams) ocean quahogs that come in under a surf clam tagged cage. This is especially true if there is a true-up mechanism to allow surf clam tags to be recovered for landings displaced by the ocean quahogs contained in that cage or trip.

We do not believe that sorting under a standard protocol needs to be a prerequisite. The bushel has been the standard unit of measurement in the SCOQ fishery since at least the original FMP. If clams sorted from mixed cages are reported in bushels, this standard unit is harmonized with how catch is currently reported. It is not a matter of management and enforcement where or how each company chooses to deploy sorting practices and technology. This flexibility allows for companies that choose to sort onboard a fishing vessel to implement that practice with final reporting on the Dealer Report.

*Comments on Atlantic Surfclam and Ocean Quahog (SCOQ) Species Separation Requirements.
Advance of Committee and Advisory Panel Meeting, J.J. Myers, Sea Watch International, Ltd.*

Providing the final bushel catch records on the Dealer Report has been and remains our position and will properly account for clam catches whether sorted on a vessel or at a shucking plant. This is a position around which there is consensus across the industry.

Thank you for the opportunity to further comment.

Sincerely:



Joseph J. Myers
Sr. Director, Innovation and Sustainability

These comments were submitted by e-mail.