

We looked at this a couple years ago and most everyone agreed the market and swing in abundance take care of the effort. I do not see the need to change the illex permitting system. Please leave this status quo.

Meade Amory

As for the illex fishery I support taking on the issue of late effort permits or permits that have been mothballed for many years and weeding them out. History shows that it has been only a handful of boats that have kept the fishery alive as it is, through the good and bad of it. I am also onboard for us as the industry to help with surveys in anyway we can to get the info that is needed, wether it be survey, taking scientists out there or trip info to get a good understanding of what is going on with illex and other species.

Leif Axelsson  
F/V Dyrsten

Dear Mr. Moore,

We are not in support of the requalification of the illex permits. My company was negatively affected by the requalification of longfin squid and we don't want to see any fleet further reduced by means of requalification. These frequent requalification efforts do nothing but harm the industry as a whole in order to benefit the few.

Thank you,

A handwritten signature in black ink, appearing to read 'Mark B.', with a large, sweeping flourish extending to the right.

Mark Bergeron  
Bergies Seafood, Inc.

Michael Doyle  
President  
Jessie Jean Enterprises  
26 Shannon Rd  
Wakefield, RI 02879  
401-742-1111  
[fvseafarer@aol.com](mailto:fvseafarer@aol.com)

Dear Mid-Atlantic Fishery Council,

My name is Michael Doyle and I have owned the FV Seafarer out of Point Judith, Rhode Island since 1989. Shortly after purchasing the vessel I installed refrigerated seawater tanks specifically for Loligo and Illex squid, but for other species as well. Back then, there were plenty of buyers in Rhode Island to purchase Loligo squid but there were no markets in the state for fresh Illex squid. Shortly after that, we decided that in order to successfully target Illex squid we had to install freezers on the vessel to best serve the market. This opened the door to more selling opportunities at a higher price. However, it limited our catching capability to about 18,000 - 20,000 pounds a day with a 125,000 lb maximum trip capacity. To successfully fill the vessel, the crew needs 7-9 days to catch our trip.

As the years progressed and more individuals entered the fishery and more shore side facilities started handling Illex squid, many boats that were formally freezer boats started taking their freezers off as well as boats started icing their products or changing back to refrigerated seawater systems (or RSW's). The FV Seafarer has an extensive history of making 10-12 Illex squid trips per season, recently we have only been able to fit in about 8 trips before the quota is gone. An influx of vessels specifically targeting Illex squid entered the market in the last few years. Some of these vessels that do not have freezing capabilities can land trips of 75,000-200,000 or more pounds every couple of days. This leads to a divide in the fishery, as boats that do not have freezer capabilities are not limited to capacity – meaning they can land more in a three-day trip than a freezer boat like the Seafarer could land in a 10-day trip. Thus, vessels with freezer capabilities have limits to what they can handle in a given day. This in turn restricts landing capabilities on freezer boats.

Lengthening the Illex squid season would be beneficial to the fishery for a couple of reasons. In May the fish are small and they do not reach their full growth potential until the latter part of the season in the summer. Thus, the fish are worth less in May and the fish are smaller but in the latter of the season they are larger and worth more money. The fish houses would still receive their products but over a longer period of time. Another way to possibly lengthen out the season would be to have boats stay in for 48 hours between trips. This would give the Illex a chance to grow which would lead to them being a better size and more lucrative. Another possible solution could be to divide the quota between the wet fish vessels and the freezer vessels. This would allow the vessels with freezer capabilities a chance to land their 10-12 trips -- as opposed to a mere 8 because they're competing with wet fish vessels that are catching the biggest percentage of the quota because they are constantly in and out of port with larger trips in a shorter period of time. Another advantage to extending the Illex season is that it takes the pressure off of landing Loligo squid because many boats hold permits for both species.

Thank you for listening to my concerns on this matter.

Sincerely,

Michael Doyle



To Council

There is a need to get this fishery under control and some type of qualification.. With the tight restrictions that just were put in affect on the herring and mackerel fishery some of the larger vessels with 0 landing on their Illex endorsement will come into play. I believe we need to see how many permits with 0 landings on them. Then, maybe also take a look at how many latent permits became activated between the control date of 2013 till 2016. Before all the hype of this fishery. Maybe look at size and catch of those new vessels that fished in that 2013-2016 period. Looks like by the chart in the document there was just average vessel participation in comparison to other years. I'm not a big believer in taking away endorsements that people have either worked for, invested in or tried to land something in a given period of time, but if an individual hasn't landed something in a period of 15-20 years then you're a little late. There should be no consideration for ) landings. If some one hasn't done their diligence and checked out a landing history before a purchase then its buyer beware.. Consideration should be given before the year of 2016 going back to 1997 That's close to 20 years that was plenty of time to catch something.

As far as on this ITQ it goes by i guess a personal preference. I AM NOT In Favor of an ITQ system. We dont wanna go there and open other doors.

A tiered system I AM NOT IN FAVOR OF maybe a " Trip Limit " of example 250,000 pound especially with the vast variety of sized vessels ive seen in the fishery.. This would spread out the fishery and not close it so early.

In the last 3 years illex have been caught as far east as Atlantis Canyon to Norfolk Canyon. That's some spread of fish. maybe the council should consider or look in into increasing the yearly T A C or quota on this matter.

Seems the stock is healthy.

As Far as recreational. I dont see party and charter boats targeting Illex Squid as a main fishery loading buckets full. I also have run these types of vessels for 25 years. . . Mostly the illex squid is used as a bycatch for live bait while tuna fishing in the canyons. The impact i believe would very very small. . They are also a little difficult to catch hook and line.

Im sure there will be more meetings and more comments to follow

Thank You

Jimmy Elliott

F/V Maizey James

Gabby G Fisheries Inc.  
PO Box 2242  
Montauk, NY 11954

Executive Director Dr. Moore,

Illex squid are a short lived species with their abundance being highly volatile from year to year. While the nature of this species makes the science side of management more difficult there is no evidence at this time that the stock is overfished or that overfishing is occurring. The past two years have seen exceptionally large biomasses of Illex and to that end the SSC just added 2,000 MT to the ABC for 2019. The industry landings have historically been as volatile as the population itself and mirrored the availability of the species with the TAC being reached only four times in the last 25 years. In the last two years it is not so much an increase in effort but an increase in availability of Illex that resulted in the TAC being reached.

While the scoping document states that action is being proposed due to “considerable latent effort in the Illex squid fishery” this is not the case, there are only 80 permits in the fishery with a many as 41 being active within a single season. In addition requalification of Illex permits would be counter to the MSB FMP objectives 2 and 3.

2. Promote the growth of the U.S. commercial fishery, including the fishery for export.
3. Provide to the greatest degree of freedom and flexibility to all harvesters of these resources consistent with the attainment of the other objectives of the FMP.

As the council moves forward from the scoping process I would like to express my desire for the no action alternative as I feel this most closely mirrors the current FMP objectives, there is no issue with recruitment in the fishery, and the stock is not overfished nor is overfishing occurring. If the council does decide to go through a requalification process both historical and recent participation should be used with data through fishing year 2018.

I am not in favor of a tiered approach at this time, but if one were to be used it should be trip limit based with no set quota allocation to individual tiers and no ITQ, IFQ or catch share system.

While I understand the council’s thoughts behind the scoping process, this is a healthy stock and fishery with a biomass that is only increasing at this time. I implore the council not to limit opportunities to fishermen to flex into this fishery when other opportunities are not present.

Thank you for your time and consideration of my comments.

Daniel J. Farnham  
Gabby G. Fisheries

Can the Council consider how 30 year old information may be updated to improve catch CAN MAFMC  
REQUEST NAFO SQUID TO ADD TO FISHING QUOTA FOR ANY YEAR?  
SHOULD COUNCIL RETHINK SQUID MANAGEMENT?  
PLEASE BRING THE ARTICLE TO ATTENTION OF SSC & SCIENCE CENTER REMINDING THEM ARTICLE IS  
OVER 40 YEARS OLD SHOULD WE ASK JAPAN FOR LATEST MANAGEMENT?  
HAVE A FAIR DAY

--

James Fletcher  
United National Fisherman's Association  
123 Apple Rd.  
Manns Harbor, NC 27953  
252-473-3287

# Annual squid (and/or cuttlefish) consumption is 1.8kg per person

— Squid is very important in Japan and accounts for about 7 per cent of its total marine food consumption of 7,500,000 tons per year.

Formerly, a major part of the squid catch in Japan was preserved by sun-drying or half-drying. The word "surume" of "surume-ika" means sun-dried squid. Today, the scene has changed. As much as 60 to 70 per cent of the yearly squid haul, totaling about 500,000 tons, is supplied to consumers in fresh or frozen form. According to a 1975 survey, an average 1.8kg per person was consumed per year

in Japan in varied forms of cooking and serving. This figure was second only to the 2.0kg per person annual consumption of dried fish, salted - dried fish, and dried and processed fish ("fushi" products), which are the primary processed forms of the various kinds of marine edibles, occupying the first place in fresh fish and shellfish category. These figures were followed by 1.4kg of horse mackerel and mackerel, and



Surume-ika fishing along the Sanriku Coast, Tohoku (Northeast) District

1.2kg of skipjack and tuna. In recent years, processed squid has become greatly diversified in appearance. Traditionally, the Japanese have eaten squid as preserved food. It is interesting that, despite this habit, a variety of squid and cuttlefish dishes have come to adorn the tables of the Japanese during the past ten years or so, because of the growth of their preference for fresh squid. The crea-

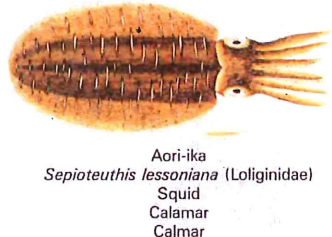
tion of this new demand owes much not only to the increased production stemming from the development of fishing techniques, but also to the developments in freezing and cold storing technology.

## Squid in Japanese waters

Japanese Name  
 Scientific Name (Family)  
 English  
 Español  
 Français

Squid or cuttlefish, which is a Mollusca and belongs to the Decembrachiata of Cephalopoda, inhabits a wide variety of waters from the coastal areas on the continental shelf to the ocean depths. The principal kinds of squid used now as edibles, or are under consideration for future use, are medium and large-sized "ko-ika" (Sepiidae), "yari-ika" (Loliginidae) and "surume-ika" (Ommastrephidae).

In addition to the types of squid mentioned above, even the small-sized species, "hotaru-ika" (Enoplateuthidae) and "mimi-ika" (Sepiolidae) are used for food in Japan. But the main haul is comprised of "surume-ika" and "ko-ika".



### La seiche

La seiche, ou le calmar sont des mollusques à dix tentacules de la classe des céphalopodes, ils vivent dans des endroits très divers allant du littoral aux grandes profondeurs. Les principales sortes que nous recherchons pour leur chair ou pour servir à d'autres usages actuels ou futurs, sont des seiches (Ika, en japonais) de grosseur moyenne, il y a la "Ko-ika" (Sepiidae), la "Yari-ika" (Loliginidae) et la "Surume-ika" (Ommastrephidae).

Au Japon la seiche est une importante denrée alimentaire, elle représente à peu près huit pour cent de la consommation nationale des produits marins; totalisant 7.500.000 tonnes par an. On estime que 60 à 70 pour cent de la récolte annuelle des seiches, c'est à dire environ 500.000 tonnes, sont dirigés sur le marché de consommation sous forme de denrées périssables ou congelées.

Cette demande n'est pas seulement attribuable à l'accroissement de la production basée sur l'amélioration au sein de l'industrie de la pêche, mais aussi au développement des techniques de congélation et de réfrigération.

### La jibia

La jibia y el calamar, moluscos pertenecientes a la familia de los cefalópodos, habitan en una amplia variedad de profundidades que van desde las zonas costeras sobre la plataforma continental hasta los profundos océanos. Las principales variedades utilizadas actualmente como comestibles o con otros fines, y también las que se encuentran aún bajo consideración para usarlas en el futuro son: "ko-ika" (Sepiidae), "yari-ika" (Loliginidae) y "surume-ika" (Ommastrephidae) de tamaño grande y mediano.

En Japón, la jibia es una fuente alimenticia muy importante que representa aproximadamente un 7% del consumo nacional, cuya cifra alcanza a 7.500.000 tons. por año. Se estima que el 60 ó 70% de la captura anual de jibias que totaliza alrededor de 500.000 tons., es suministrado a los consumidores en forma natural o congeladas.

Esta demanda es atribuible no solamente al incremento de la producción basado en las mejoras realizadas dentro de la industria pesquera sino también al desarrollo de la tecnología de refrigeración y congelamiento.



# Japan's Squid Fishery

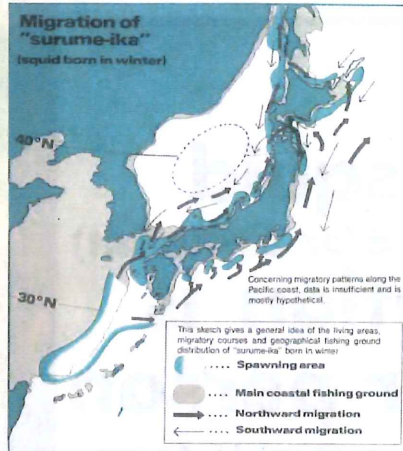
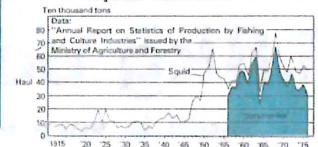


Fig. 1 Fishing techniques as of 1975

	1	2	3	4	5	6
Squid angling	.....	.....	.....	.....	.....	.....
Pole and line fishing	.....	.....	.....	.....	.....	.....
Offshore trawling	.....	.....	.....	.....	.....	.....
Small size trawl net	.....	.....	.....	.....	.....	.....
Large size set net	.....	.....	.....	.....	.....	.....
Small size set net	.....	.....	.....	.....	.....	.....
Other fishing methods	.....	.....	.....	.....	.....	.....

Scale: 1 square = 5,000 tons

Fig. 2 Yearly changes in squid catches



## Resources

"Surume-ika" (*Todarodes pacificus*) is one of the most important marine resources in Japan. This species once accounted for 80 to 90 per cent of the total squid catch, but recently it has decreased to only 70 to 80 per cent. Accordingly, research on "surume-ika" has been the most among the various studies on marine resources. The following is an outline of the state of "surume-ika" resources.

According to recent investigations and studies, it has been confirmed that there are three subpopulations of "surume-ika" with different spawning seasons.

### (1) Squid born in winter

- Constitute the largest amount of resources.
- Are widely distributed in Japanese waters from the East China Sea to the Kurile Islands and off the coast of Sakhalin.

### (2) Squid born in autumn

- This population is the next important resource to squid born in winter.
- This group spawns from September to November (autumn to early winter), and its spawning areas are the southwestern sea of Kyushu, off the eastern coast of Korea, and the outskirts of the continental shelf in the northern and central East China Sea.

### (3) Squid born in summer

- It has been confirmed that there are groups which spawn from June to August along the coasts of the Sea of Japan extending as far as Oki-Hokuriku-Sado, and along the coasts of Izu and Boso of Pacific. Both are localized and represent small groups which complete their life cycle in their spawning areas.

There are several interesting features concerning the number of available "surume-ika". As shown in Fig. 2, good and poor squid catches repeat in an 8 to 10 year cy-

cle. The locations of good fishing grounds have been subject to heavy fluctuation during the past 30 years, partially because of the changing condition of fishing grounds. It has been observed that recently, the number of squid born in winter is decreasing.

(Data supplied by the Fisheries Agency)

## Development of Fishing Techniques

### (1) Ecology of "surume-ika"

The main characteristics of the mode of life for "surume-ika" are:

1. It feeds hungrily while swimming freely and quickly over a wide area.
2. As it grows, its grouping instinct becomes stronger.
3. Highly developed senses and eyes pro-

vide quick reaction to light.

4. It lives in 60m to 100m depths during the day, and floats to 20m to 50m from evening into night.

### (2) Angling is the leading method

Squid may be caught with both a dragnet and a set shore net, but the leading method is angling.

Approximately 80 percent of the total "surume-ika" catch comes from angling. (See Fig. 1.)

Already in the 18th century, the "ikazuro" (hook), skillfully adapted to the habits of squid, was in use. And it is still enjoying widespread application, but with a number of improvements.

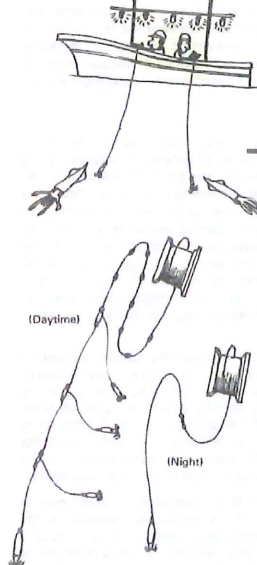
### (3) Method using fish lamp

Some methods of fishing involve using a rod and line, or net, during daytime, but in Japan there is also a nocturnal method utilizing an automatic cuttlefish angler wherein fish lamps are employed.

## Changes in "Surume-ika" Fishing

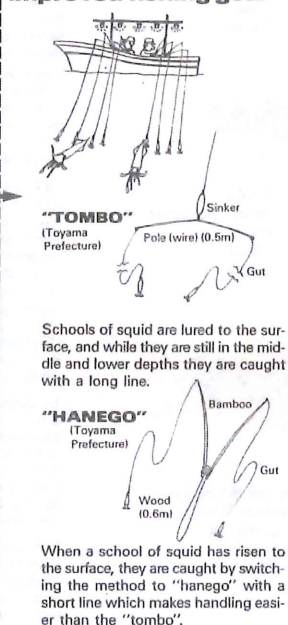
### Pole and line fishing

This is the simplest fishing method that has been in constant use since ancient times.



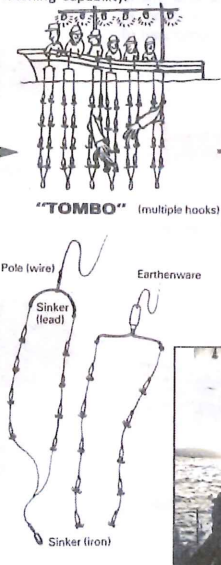
Yamaha Fishery Journal

### Pole and line fishing with improved fishing gear



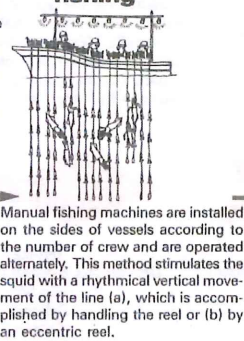
### Coupling multiple hook fishing

Several hooks on one line improve catching capability.

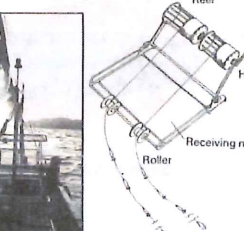


\*Illustrations of fishing gear and methods were prepared in accordance with the "World Squid and Octopus Resources and Their Usage", published by the Japan Marine Fishery Resources Research Center.

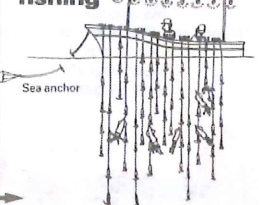
### Manual machine fishing



### Manual squid angler

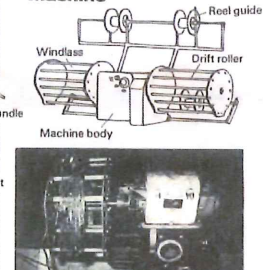


### Automatic machine fishing



The reciprocating rotational motion of the reel has been automated. To operate this machine, two kinds of power, electric and hydraulic, are utilized.

### Automatic squid fishing machine





This latter method has witnessed an overwhelmingly wide application and now plays the leading role in the nation's squid fishing. It is a skillful method drawing on the squid's quick reaction to light.

#### (4) Development of the fishery

Fig. 2 shows the yearly fluctuations in squid catches in Japan.

From these figures, the rapid growth of squid catches through the 1950's can be readily seen. The following may be cited as the main contributing factors:

##### Postwar rehabilitation

- In the years immediately following World War II, there was a strong drive aimed at promoting fishing production as an immediate remedy.
- Thanks to several administrative measures, the building of fishing vessels was promptly expedited.

- Squid angling, which requires only simple fishing equipment and techniques, can be accomplished easily. Moreover, since the method does not require large-scale equipment, anybody could undertake this type of fishing even with a small boat.

##### Period of development

- During these years, fishing vessels were gradually motorized and enlarged. Until the 1950's unpowered boats of less than one ton made up the vast majority of vessels used in coastal areas. But toward the latter half of the 1950's powered vessels of less than one ton appeared in increasing numbers, while, at the same time, powered vessels of 1 to 1.5 tons emerged as a new force.
- Substantial improvements in fishing equipment and methods were also made. Simple pole-and-line fishing tackle became multihook type and, further, mechanical anglers appeared. In the 1960's, electrically powered automatic fishing gear was put into practical use, resulting in a rapid growth in productivity.
- Other related equipment were also improved. Such nautical instruments as two-way radios, direction finders, etc., were installed, and even in small coastal vessels sophisticated equipment, like fishfinders, fish lamps, etc., were brought into daily use.

##### Development of offshore fishing grounds

- From 1961 to 1963 the Fishery Agency and the Experimental and Research

Agencies in each prefecture began to conduct joint studies on the resources of their respective sea areas. As a result, new fishing grounds for "surume-ika" born in autumn were developed in the Sea of Japan.

- Fishermen with comparatively small capital resources who owned medium-sized vessels of more than 30 gross tons and were engaged in dragnet or driftnet seining began to turn to "surume-ika" fishing. They operated on the Yamato bank as well as elsewhere with excellent results. This is a superb example of a government agency playing the guiding role in the development of a fishing industry by means of basic research.

#### L'industrie japonaise de la seiche

##### Ressources

Au Japon, la "surume-ika" (*Todarodes pacificus*) est l'une des plus importantes. A une époque, cette espèce représentait 80 à 90 pour cent de la pêche totale des seiches, mais ces dernières années elle ne compte plus que pour 70 à 80 pour cent. Les recherches sur la "surume-ika" sont celles qui ont fait le plus de progrès parmi les études sur les ressources animales marines.

##### Amélioration des méthodes de pêche

Il y a plusieurs méthodes pour pêcher la seiche, y compris l'usage du chalut ou du filet posé. Mais la pêche à la ligne est de loin la méthode la plus populaire, pour cette sorte de pêche on utilise des systèmes de lignes à seiches automatiques qui sont très efficaces, et des pièges lumineux pour la nuit, cette méthode est aussi très efficace vu que la "surume-ika" se laisse très facilement attirer par la lumière.

#### Industria de la jibia en Japón

##### Recursos

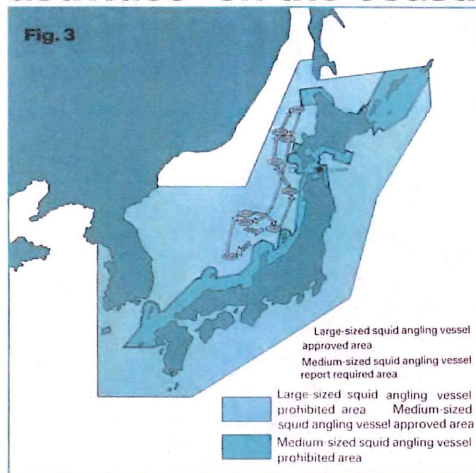
En Japón, la variedad "surume-ika" (*Todarodes pacificus*) es una de las más importantes. Antiguamente, esta especie representaba un 80 ó 90 por ciento de la captura anual de jibias, pero en años recientes este porcentaje ha disminuido hasta llegar a un valor que oscila entre un 70 y 80 por ciento. Por consiguiente, la investigación realizada con respecto a la variedad "surume-ika" ha dado también como resultado grandes progresos en el estudio de las fuentes de recursos marinos.

##### Desarrollo de los métodos de pesca

Hay un gran número de métodos para la captura de la jibia, incluyendo el uso de redes barreras o redes estacionarias. Sin embargo, el sistema más popular es en el que se utiliza las altamente eficientes máquinas automáticas para la pesca de la jibia y también las luces de señuelo durante la noche, aprovechando de que la variedad "surume-ika" es fácilmente atraída por la luz.

# Fishermen's Choice

**"To specialize in squid fishing" offshore or "To engage in multiple activities" on the coast.**



According to fishery regulations, Japan's squid fishing vessels are divided into three groups:

- Small-sized vessels  
..... Less than 30 gross tons
- Medium-sized vessels  
..... More than 30 gross tons but less than 100 gross tons
- Large-sized vessels  
..... Over 100 gross tons

As shown in Fig. 3, the government has established legal fishing grounds according to vessel size for medium and large vessels. It also has adopted a system of notification for areas where fishing is approved in order to restrict the number of vessels. As for the fishing process itself, the government has imposed restrictions on the intensity of fish lamps, fishing season, etc., for all vessels, including those in the small-sized category.

## Trends among Fishermen Engaged in Coastal Squid Fishing

This group, first of all, is gradually making all its vessels large-sized in order to expand their fishing grounds. Since the fishermen of this group are independent, they will not continue to expand vessel size beyond a

certain point, but will seek the optimum sized vessels corresponding to their own capital resources. In this respect, management policy is divided into two groups:

- Men who turn in their small squid fishing boats for larger models to specialize in offshore squid fishing:  
This group is continuously moving from one fishing ground to another seeking migrating schools of "surume-ika". The hauls are unloaded at the nearest designated fishing port every few days. Each vessel is constantly exchanging information on fishing conditions with sister vessels working various sea areas. (Mainly comprised of 15, 20 and 29 ton type vessels.)



Mr. Kunida  
He derives great pleasure in studying charts during his leisure hours at home.  
Fig 3 shows the various fishing grounds he worked last year.

- Men who perform multiple fishing operations depending primarily on squid fishing:  
This group keeps squid fishing as its main business, but during the offseason or in the event of poor catches will operate a combination of other types of offshore fishing such as angling, long-lining, gill-netting, etc. (Composed mainly of 7 to 10 ton and 14 to 15 ton vessels.)

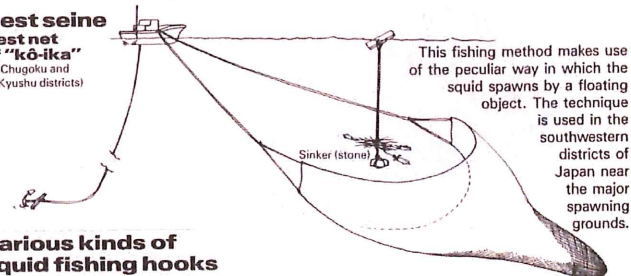


Mr. Nakajima  
He plans to challenge in new fishing techniques every year. The photo shows him making a trout fishing gear by himself.

## Other squid catching methods

### Nest seine Nest net of "kô-ika"

(Chugoku and Kyushu districts)

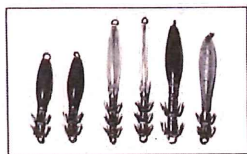


This fishing method makes use of the peculiar way in which the squid spawns by a floating object. The technique is used in the southwestern districts of Japan near the major spawning grounds.

### Various kinds of squid fishing hooks



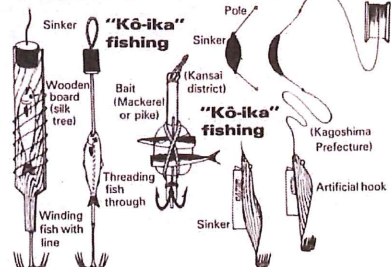
Here is one typical example. There are many different kinds of squid catching hooks which are made by fishermen or distributed as commodities. The different hooks offer a range of local color.



What is shown here is just one example. Different methods are used according to the kinds of squid and their bait taking habits. The two types of bait which can be used are: fresh fish and artificial fish.

### "kô-ika" and "aka-ika" fishing

(Izu district)



### Système de l'industrie des pêches

D'après le système de l'industrie des pêches, la flotte de pêche à la seiche du Japon se divise en trois groupes:

- Petit tonnage ... Moins de 30 tonnes.
- Moyen tonnage ... Plus de 30 tonnes mais moins de 100 tonnes.
- Gros tonnage ... Plus de 100 tonnes.

Comme on peut le voir en Fig. 3, le gouvernement a établi des terrains de pêche réglementaires d'après la grosseur des bateaux de moyen et de gros tonnage. Afin de réduire le nombre des bateaux, il a aussi adopté un système de notification pour les régions où la pêche est approuvée. En ce qui concerne le travail, le gouvernement a imposé des restrictions sur l'intensité des pièges lumineux, sur les saisons de pêche, etc., et ceci pour tous les bateaux, y compris ceux de petit tonnage.

### Sistema de la industria pesquera

De acuerdo al sistema de la industria pesquera, la flota japonesa para la pesca de la jibia se divide en tres grupos:

- Tamaño pequeño ... Menos de 30 tons.
- Tamaño mediano ... Más de 30 tons. pero menos de 100 tons.
- Tamaño grande ... Más de 100 tons.

Como se ve en la Fig. 3, el gobierno ha establecido pesqueras legales de acuerdo al tamaño mediano o grande de las embarcaciones. También adoptó un sistema de notificación en zonas donde la actividad ha sido aprobada con el fin de restringir el número de embarcaciones. En cuanto a la actividad, el gobierno ha impuesto restricciones sobre la intensidad de las lámparas de señuelo, temporada de pesca, etc., para todas las embarcaciones incluyendo también las de pequeño tamaño.



# Amazingly wide use of squid

There are innumerable recipes for squid, and the Japanese love them all. They include everything from broiling through boiling to deep-frying and even eating the fresh meat raw, and they're always easy to prepare. Also, various types of preprocessed squid are available on the market.



**Fried:**  
Fried round slices.



**Stir fried:**  
Stir fried with vegetables. Also, it may be stir fried with some other type of meat.



**Broiled:**  
Spit-roasting to avoid curling up when heated.

## Various ways of cooking



**Dressed:**  
Miso-dressed par boiled tentacle meat.



**Boiled:**  
Stewed with various vegetables.



**Eaten raw:**  
Sliced meat covered with "Tarako" (cod's roe)

## Squid Meat and Its Ingredients

Squid is quite generally different from fish, not only in the external appearance, but also in the structure, texture, and chemical ingredients of its meat.

As shown in Fig.1, the muscular system of the torso is composed of two kinds of alternately laminated muscular fibers (a) and (b), the former circling through the torso to form lateral parallel lines, the latter running vertically from the outer layer of the skin to the inner side.

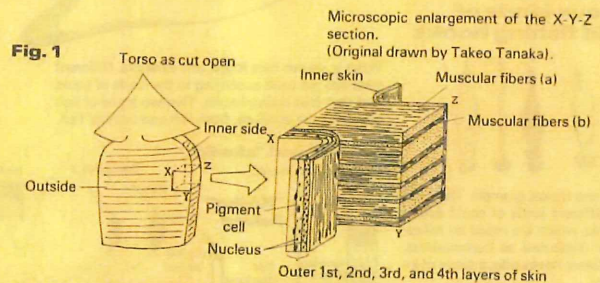
The muscular structure of the torso is simpler than in ordinary fish; thus, when dried, it can readily be torn into pieces laterally. Conversely, the head and tentacles, the muscular structure of which is more complicated than the torso, are not easy to bite off with the teeth.

The outer skin is comprised of four layers; the first through the third being a network type structure, the fourth being of parallel fibers running vertically. The torso, when

boiled or broiled, curls due to terminal contraction of the fibers of the fourth layer. Table 1 shows the chemical breakdown of squid. As far as calories are concerned, squid meat is superior to that of sea bream. The basic ingredient, protein, is of a texture similar to that of an ordinary fish, except that squid protein has a high fresh water or diluted salt water solubility with the result that its meat, when subjected to bleaching in water, loses about 50 per cent of its protein content.

Squid meat, which contains almost the same essence, both quantitatively and qualitatively, as the pink meat of common fish, boasts a rich and somewhat sweet taste.

Squid is easy to digest, especially when eaten raw or boiled, but less so when broiled or dried.



**Table 1 Comparison of Squid and Sea Bream Meat**

		Water	Protein	Glycogen	Fat	Ash	Calorie per 100g
"Surume-ika" (caught in mid-August)	Torso	76.67	21.0	0.21	1.11	1.68	102.67
	Head and tentacles	76.51	20.3	0.24	0.91	1.61	97.88
Sea bream	Caught in mid-July	79.45	18.10	0.21	0.69	1.54	79.49
	Caught in mid-Sept.	76.71	19.41	0.34	2.17	1.36	98.56

(Source: Teruhiko Sato)



# Processed



**Surume:** Sun-dried



Saki-ika processing



**Delicacies:**

- a. "Saki-ika" (shredded dried squid)
- b. Smoked
- c. "Noshi-ika" (flat-rolled dried squid)



**Canned:** Various methods available.



**Salt-stored:** Preserved in entrails/salt mixture.



**Salted guts:** Fermented salt-pickled meat and entrails.



**Frozen:** Processed frozen meat for home cooking.



**Paste:** Added to various secondary-processed foods.

# Processed

## A Variety of Uses

<b>Food</b>	• Fresh fish	a. "Sashimi" (sliced raw fish), "sushi", etc.	
		b. A variety of recipes.	
	• Processed food	a. "Surume" (dried squid).	
		b. Salted and dried, salted.	
		c. Canned.	
		d. Smoked.	
		e. Fermented:	"Ika-miso" (bean paste with squid), paste, salted squid guts and preservation in "miso".
		f. Paste:	"Kamaboko" (boiled fish paste), "Chikuwa" (fish paste in stick form), sausage.
<b>Non-edibles</b>	g. Boiled with soy sauce for preservation.		
	h. Delicacies:	"Saki-ika" (shredded dried squid), "Noshi-ika" (flat-rolled dried squid).	
	• Vitamin B <sub>1</sub> .....	Eye	
	• Material for fish soy sauce .....	Liver	
	• "Ika-abura" (cuttlefish oil) .....	Liver	
	• Feed .....	Liver	
	• Pigment (sepia) .....	"Sumi-bukuro" (ink-filled sac)	

## Preservation of Freshness

Squid has a number of good qualities as an edible, one of which is its rich flavor. Unfortunately, this very factor also attracts bacteria, and that causes it to spoil quickly.

to preserve the freshness of squid so that it may be depended on as one of Japan's food staples. The followings are methods currently in domestic use to achieve this end:

Thus the importance of special measures

### Treatment aboard

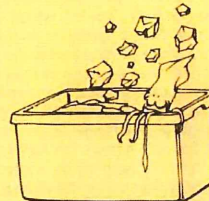


Carried alive.

### How to keep freshness during distribution process on the land



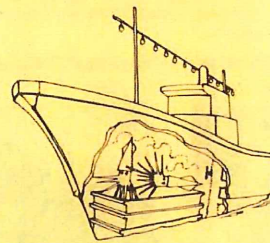
Sold raw at the local market.



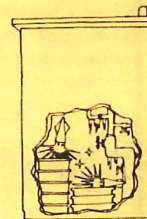
Packed in ice



Kept iced in a low-temperature place.



Rapidly frozen aboard ship.



Preserved in a low-temperature refrigerator

## Edibles vs. Non-edibles

Squid tops all other marine products in terms of the ratio of edible to non-edible portions. The edible portions of "surume-

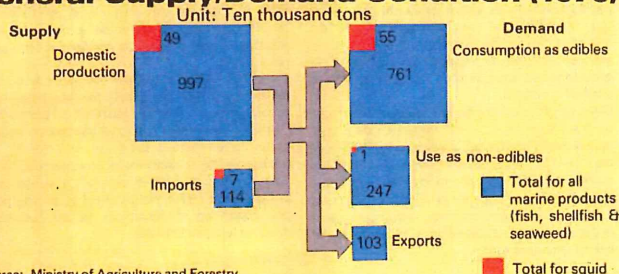
ika" account for 80 to 85 per cent of the body by weight, compared to only 50 to 60 per cent for fish in general.

### Edible vs. Non-edible Portions of "Surume-ika"

Body size	Average weight (g)	Edible portions (torso, head and legs)		Non-edible portions (liver, reproductive organ, "Sumi-bukuro", horny part of mouth, bone)	
		(g)	(%)	(g)	(%)
Small	122	104	85.3	18	14.7
Medium	219	184	83.8	35	16.2
Large	411	336	81.7	75	18.3

Source: Kokichi Oshima

## General Supply/Demand Condition (1976)



Source: Ministry of Agriculture and Forestry

Vu que la seiche sert de nourriture dans d'autres parties du monde, en Chine, dans le Sud-Est Asiatique et dans les pays Méditerranéens, elle est pour nous une ressource alimentaire de première importance. Voici quelques avantages qui font qu'elle est très estimée:

- \* Un plus grand pourcentage de parties comestibles que les poissons.
- \* Délicieuse, goût agréablement doux.
- \* Se prête à de nombreuses recettes.

Mais la seiche ne se garde pas très longtemps, ce qui fait que des précautions doivent être prises pour qu'elle puisse conserver sa fraîcheur jusqu'à la cuisine de la ménagère.

Puesto que la jibia es también muy apreciada como un sabroso y nutritivo alimento en otras partes del mundo tales como en China, países del Sudeste Asiático y del Mediterráneo, ésta representa una de nuestras más importantes fuentes de recursos marinos. He aquí algunas de sus características sobresalientes:

- \* Mayor porcentaje de partes comestibles que cualquier otro pez común.
- \* Sabor delicioso.
- \* Adecuada para una amplia variedad de recetas culinarias.

Sin embargo, la jibia tiene el inconveniente de echarse a perder muy fácilmente, de ahí la necesidad de tomar precauciones para preservarla fresca desde el momento de su captura hasta la consumición final.



# Squid Can Be Useful Worldwide

## Idea for the Exploitation of Marine Resources

At present around 450 to 500 species of squid have been identified living in the seas of the world.

The problem is, how many of them can be of use to mankind.

For squid to benefit mankind, they must satisfy the following conditions: (1) Uniformity of size at exploitable phase, medium or large from 15 to 30 centimeters in length.

(2) Aggregating habits at least once through their life span, during either feeding, migrating, mating or spawning season.

(3) Edibility

In general, the third condition is stressed taking into account, of course, a nation's dietary habits as well as individual tastes. From the standpoint of commercial fishing, however, the first and second conditions must first be satisfied.

This is because food preferences of the people depend heavily on their respective methods of processing marine products and their uses. If the processing technique is properly developed, the psychological attitude of people who are not acquainted with squid meat as a food can be improved.



Takashi Okutani, Doctor of Science, Resources Division, Tokai Regional Fisheries Research Laboratory, Specialty: Marine Biology (Mollusca)

Here is a review of squid and cuttlefish resources considered to be edible by man. First, mention must be made of "kō-ika" (Sepiidae), of which 90 to 100 species are known, and "yari-ika" (Loliginidae), of which there are about 60 varieties.

Maintaining coastal habitats neither migrates in the open sea, unlike "surume-ika" (Ommastrephidae), and both come in diversified kinds.

Thus, their distribution is limited to circum-littoral zones, and as a result they can be caught even by primitive fishing methods, whether by use of a spear or a simple four-armed scoop net.

Even catching by hand is possible during their spawning season when they migrate to the shore to groups.

These methods have long been employed

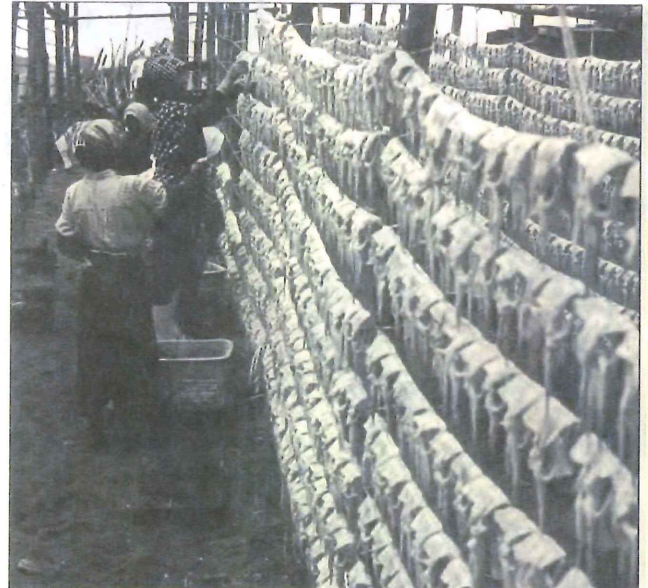
in Japan, as well as in Southeast Asian countries.

Next, "surume-ika", a kind of squid belonging to the family Ommastrephidae inhabiting offshore areas, approaches coastal waters at a certain period in their life cycle. To catch this type of squid on a large commercial scale requires large-sized vessels supported by various kinds of modern fishing equipment and technology.

It must be mentioned, however, that "surume-ika", is almost always found in the areas surrounding the habitats of "kō-ika" and/or "yari-ika". The distribution of "surume-ika" is almost always found in the open sea, is determined by the geographical arrangement and topographies of adjacent land or islands.

In countries where fishing for squid (or cuttlefish) has yet to be developed, it is recommended that initial efforts be made to catch "yari-ika" and/or "kō-ika" which inhabit waters near coasts or islands. In this way, these nations upon recognizing the importance of squid as a source of marine protein, can eventually follow the course taken by Japan in the development of offshore squid angling. Trawl fisheries are the mainstay of "kō-ika" fishing. As for "surume-ika" or "yari-ika", angling by means of jigs as it has developed over the years is effective and economical, and boasts at least two advantages over trawling:

- (1) There is no fear of damage to the product, yielding fish with the skin intact.



Sun-drying of Surume-ika is rarely seen because drying process has already become automated.

(2) Being a selective method, fish under commercial size are not caught.

It is recommended that countries contemplating squid fisheries make a study of Japanese squid jigging methods, as well as on squid resources (particularly those of "surume-ika"), so an analogy of between these methods and theirs. However, in practical application of fishing methods or equipment, it is necessary that local biologist-ecologist experts be consulted to determine appropriate fishing techniques. Finally, mention must be made of the reproductive power of the squid, which was once thought to be great, has proved to be less than imagined according to the findings of the recent research.

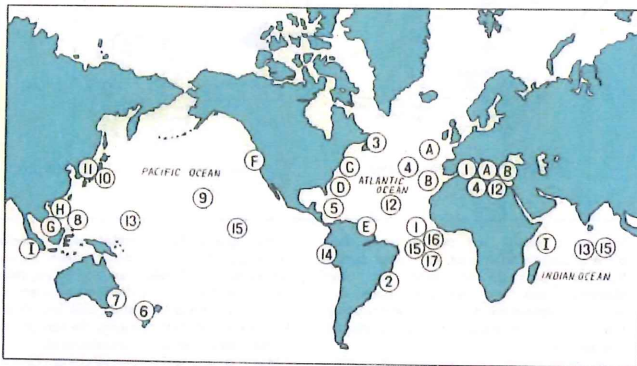
The fact that "surume-ika" in Japanese waters lives for only about a year, maturing in a short period of time led to the belief that the conventional fishing intensity would not cause a serious curtailment of the stock size. However, it is now believed

that the squid is not so durable against external pressure judging from the following facts: that is, it travels quickly over a vast area of the sea, has delicate reproductive mode, and its habitats are easily influenced by physical oceanographic conditions.

The problem facing the developing countries in undertaking squid fishing by small-sized vessels does not involve the resources, which are abundant now, but rather is concerned into the ways to help increase squid consumption through development of effective processing.

Note: Fig. 1 does not include "kō-ika" and the like (Sepiidae), which are found in the circumlittoral areas in the tropical to subtropical zones along the Eurasian and African continents as well as islands in the marginal seas. No Sepiidae are found along either North or South America.

Fig. 1 Distribution Map of Major Species of "Yari-ika" (A-I) and "Surume-ika" (1-17) families



- |                           |                         |                     |                        |
|---------------------------|-------------------------|---------------------|------------------------|
| A. <i>Loligo forbesi</i>  | B. <i>L. vulgaris</i>   | C. <i>L. pealei</i> | D. <i>L. Plei</i>      |
| E. <i>L. surinamensis</i> | F. <i>L. opalescens</i> | G. <i>L. edulis</i> | H. <i>L. chinensis</i> |
| I. <i>L. duvauceli</i>    |                         |                     |                        |
- 
- |                                             |                                 |                                  |                                |
|---------------------------------------------|---------------------------------|----------------------------------|--------------------------------|
| 1. <i>Todaropsis eblana</i>                 | 2. <i>Illex argentinus</i>      | 3. <i>I. illecebrosus</i>        | 4. <i>I. coindetii</i>         |
| 5. <i>I. oxygonius</i>                      | 6. <i>Nototodaropsis sloani</i> | 7. <i>N. s. gouldi</i>           | 8. <i>N. s. philippinensis</i> |
| 9. <i>N. s. hawaiiensis</i>                 | 10. <i>N. nipponicus</i>        | 11. <i>Todarodes pacificus</i>   | 12. <i>T. sagittatus</i>       |
| 13. <i>S. Symplectoteuthis ouatanlensis</i> | 14. <i>Dosidicus gigas</i>      | 15. <i>Ommastrephes bartrami</i> | 16. <i>O. angolensis</i>       |
| 17. <i>O. caroli</i>                        |                                 |                                  | 17. <i>O. peruvianus</i>       |

by T. Okutani

### La seiche à travers le monde L'accroissement des ressources marines

Jusqu'à maintenant on a identifié entre 450 et 500 espèces de seiches vivant dans les mers de notre monde.

Nous allons passer en revue les ressources en seiches considérées propres à la consommation humaine. Tout d'abord il nous faut mentionner la "ko-ika" (Sepiidae), dont 90 à 100 sortes sont bonnes, et la "yari-ika" (Loliginidae), qui se compose d'environ 60 variétés. Au contraire de la "surume-ika" (Ommastrephidae) qui vit en haute mer, ces deux espèces vivent dans les régions côtières et toutes les deux se composent de nombreuses variétés.

Donc, les endroits où elles vivent se limitent à des zones régionales, et elles peuvent être attrapées par n'importe quelle méthode de pêche.

Ensuite, vient la "surume-ika" (Ommastrephidae), une sorte de seiche qui fait partie des espèces vivant en haute mer, mais qui se rapproche des côtes à un certain moment de l'année. Attraper cette espèce de seiche demande le support de chalutiers de gros tonnage équipés d'un matériel de pêche varié et moderne.

Dans les pays où la pêche à la seiche n'en est qu'à ses débuts, il est recommandé de porter les premiers efforts sur la pêche à la "yari-ika" ou "ko-ika", lesquelles vivent près des côtes ou près des îles. De cette façon, les pays ayant reconnu l'importance de la seiche en tant que source de protéines marines, pourront suivre le Japon dans l'accroissement de la pêche à la seiche en haute mer.

### La Jibia — Desarrollo de los Recursos Marinos

Haste la fecha han sido identificadas entre 450 y 500 especies de jibias en los océanos de la tierra.

A continuación presentamos una reseña de los recursos de la especie de la jibia considerados comestibles por los humanos. Primero, debe mencionarse que existen entre 90 y 100 clases utilizables de "ko-ika" (Sepiidae) y aproximadamente 60 variedades de "yari-ika" (Loliginidae). Estas variedades habitan en las zonas costeras, a diferencia de "surume-ika" (Ommastrephidae) que flota en el mar abierto.

De este modo, su distribución está limitada a zonas marinas regionales, con el resultado de que pueden capturarse prescindiendo de métodos de pesca especiales.

La variedad "surume-ika" (Ommastrephidae), una clase de jibia perteneciente al género que habita en zonas lejos de la costa, se acerca solamente a esta en cierta estación del año. Para la captura de esta clase de jibia se requieren transportadores de gran tamaño y además varias clases de modernos equipos para pesca.

En países donde todavía no se encuentra desarrollada la captura de la jibia, se recomienda en primer término la pesca de "yari-ika" o "ko-ika", ya que habitan en aguas cerca de la costa o islas. De esta forma, al reconocer tales naciones la importancia de la jibia como una fuente marina de proteínas, pueden seguir eventualmente el curso seguido por Japón en el desarrollo de los recursos marinos lejos de la costa.



# Opening the Way for the New Age of Squid Fishing



Yamaha fishing vessel DY-33-0 (3 gross tons)

YAMAHA has long been supplying FRP boats for squid angling, in sizes ranging from 3 to 20 gross tons, in particular, those of 4.9, 9, and 18 tons. All of them are distinguished by their high speed, and many shipowners equip them with such modern navigation equipment as two-way radios, direction finders and loran. Further efforts are being made by these fishermen to extend fishing grounds and increase catching efficiency through the use of fish finders, automatic squid anglers and high-power fish lamps.

The types of fishing boats desired by shipowners differ considerably from region to region. In general, "stocky type" boats with wide beam in relation to length are favored for the Pacific coast fishing of eastern Japan, while the "slim type" vessels with a narrower beam are predominant in the Sea of Japan coastal areas of western Japan.

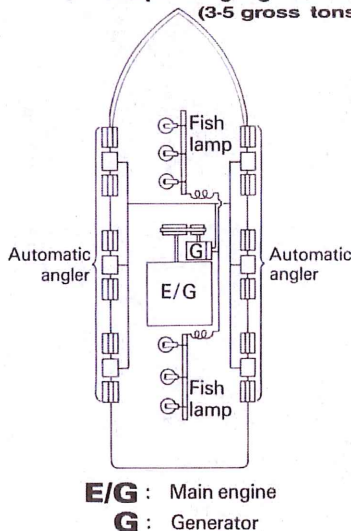
This difference in the type of vessel is attributable to the variation in the sea conditions of individual regions and in vessel capability as required by the owners. Fishermen in western Japan place emphasis on the ability of boats to develop high speed and resist a following wave, thus they desire for slim type vessel. On the other hand, since fishermen in eastern Japan place emphasis on proper rolling angle and cycle, they favor broad beam boats for high anti-rolling capability. Squid angling is larger in scale on the Pacific side of Japan than in the western Japan sea districts. Small-sized coastal vessels operating in waters off eastern Japan are generally larger than those in the Sea of Japan. Moreover, those operating off the east coast are equipped with improved fishing apparatus, and their main engine, generator and fuel tank are of larger capacity.

Two important pieces of fishing equipment are the automatic squid angler and the fish lamp. What concerns the shipowners most is how to outfit their boats with as many angling devices as possible and how to raise the power of their fish lamps.

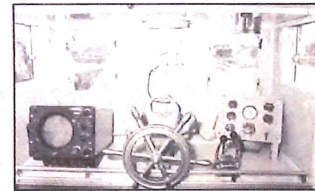
Fig. 1 shows an arrangement of fishing

equipment on board 3 to 6 gross ton vessels. The generator is run from power provided by the main engine, and the resultant electricity activates the fish lamps and the angling devices. The boats are allowed to drift during the operation, thus eliminating necessity of additional power from the main engine.

Fig.1 Arrangement of Equipment on A Squid Angling Vessel (3-5 gross tons)



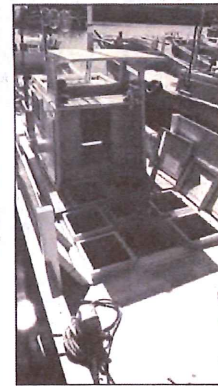
Also important is the method by which the catch is carried. Squid caught by vessels operating in coastal waters are not outfitted with refrigeration equipment. The catch is either packed fresh with ice or left swimming in wells on board. The fish-hold is of an insulated construction with bulkheads and lid-covers filled with plastic foam to prevent temperature rise in the interior of the hold.



Steering house



Yamaha fishing vessel DY-43-0K (5 gross tons)



Yamaha fishing vessel DY-40A-0A (4 gross tons)

Pour la pêche à la seiche on utilise des bateaux de 3 à 20 tonnes, Yamaha a lancé à cet usage des bateaux en FRP de 4,9,9 et 18 tonnes. Les propriétaires qui les équipent d'appareils de navigation dernier cri (équipement de communication radio, sextant, récepteur loran, etc.). Les propriétaires cherchent à étendre de plus en plus leurs terrains de pêche et à obtenir une plus grande efficacité de travail grâce aux nouveaux appareils de pêche tels que le sonar, le système de lignes automatiques pour attraper les seiche et un puissant éclairage pour les attirer.

YAMAHA ha estado suministrando un gran número de barcos FRP para la pesca de la jibia, en una amplia variedad de modelos que van desde 3 hasta 20 tons., y también aquellos de 4,9,9, y 18 tons. Todos estos barcos se distinguen por su alta velocidad, y además vienen provistos con el más moderno instrumental de navegación (equipo de radiotransmisión, radiocompás, receptor loran etc.). También, le permitirán ampliar su pesquera y mejorar la eficiencia en la pesca con la ayuda de nuevos aparatos tales como: buscador de peces, dispositivo para pesca automática de la jibia y luz señuelo de alta luminosidad.

## Research on Australian Octopus Resources



Yamaha DT-46-0A. The same type as an octopus fishing boat for Australia

Under an agreement signed between Japan and Australia, the National Federation of Fisheries Cooperative Associations and the Overseas Fisheries Cooperation Foundation, both Japanese, will jointly conduct research on the fishery resources of Australia. The undertaking is aimed at eliminating octopuses which are damaging the lobsters inhabiting the seas of western Australia, while at the same time utilizing them as edibles.

To serve the project, a YAMAHA FRP fishing boat is being provided to the government. The vessel, a model DT-46 equipped with an ME 950 main engine, has the following specifications: 4.98 gross tons, 14.08 meters overall length, maximum speed of 12.5 knots, and equipment to permit efficient hauling of a long line fitted with octopus traps. The ship, already launched, is scheduled to start operation in March, 1978.

A la suite des accords qui ont été signés entre le Japon et l'Australie, deux organismes japonais, la Fédération Nationale des Associations de Coopératives de Pêche et la

Fondation de coopération pour la Pêche en Haute Mer, ont décidé de se joindre au programme de recherche Australien sur les ressources en poulpes. Pour faciliter ses recherches, le gouvernement de l'Australie Occidentale a porté son choix sur un bateau de pêche en FRP de Yamaha. Ce bateau, modèle DT-46 équipé d'un moteur principal ME-950, a les caractéristiques suivantes: Longueur hors tout, 14,08 mètres; 4,98 tonnes et une vitesse maximum de 12,5 noeuds.

Según lo acordado entre Japón y Australia, Federación Nacional de Asociaciones Cooperativas Pesqueras y la Cooperación Internacional de Pesca, ambas entidades Fundación para japonesas, han decidido llevar cabo conjuntamente la investigación que tie por objetivo determinar los recursos marino de la especie de la jibia en el territo australiano. Para realizar tal proyecto el gobierno de estado de Australia Occidental ha elegido como barco pesquero al FRP de YAMAHA. El barco, modelo DT-46 con motor ME-950 tiene las siguientes características: 14,08 m de longitud total, 4,98 toneladas brutas pudiendo alcanzar una velocidad máxima de 12,5 nudos.



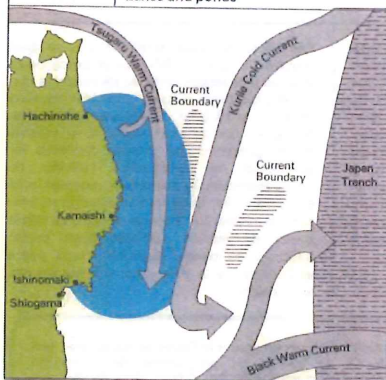
# Typical Rias Coast

The area colored in blue is called the Sanriku Coast. To the north it boasts innumerable terraced hills, while its southern portion consists of a series of capes and deep inlets; thus forming a complicated coastline.



Bay along the south Sanriku Coast

Geographical grouping of coastal fishing grounds	
Open seas	Unbroken coast line
	Rias coast
	Peninsula salient
	Inlets of large bay
	Seas dotted with islands
Inland seas	Sand and mud zones
	Reef zones
	Lagoons
	Brackish waters
Inland waters	Rivers
	Lakes and ponds



Squid fishing Tôni Bay



Oyster shell ripping Funakoshi Bay



Scallop farm Yamada Bay



Launching ceremony for a squid fishing vessel (9.5 gross tons) Ofunato Port



Haul of cultured oysters Yamada Bay

The waters off the Sanriku Coast constitute one of the world's most productive fishing grounds.

The Black Warm Current and the Kurile Cold Current converge to produce an admixture of both warm and cold water areas. Thus, an oceanic front (current boundary) develops to provide a place for fish to form schools. The main kinds of fish living in this area include mackerel, pike, sardine, mackerel, squid, skipjack and tuna, all of which are migratory species belonging to the Black Current. Because of this the fishing ports of Hachinohe, Kamaishi, Shiogama and Ishinomaki have developed and flourished.

Coastal fisheries, using small-sized boats of 1 - 5 gross tons actively employ various kinds of angling, long line, gill net and stick-held dip net methods.

Yamaha Fishery Journal

Set net fisheries have long been established in the deep inlets, catching yellowtail and sardines, while the catch of salmon has been increasing recently, as well. These coastal areas are also noted for fish farming. A number of self-employed small-scale fishermen are cultivating such shellfish as scallops and oysters, as well as seaweed, like kelp, "wakame" and laver.

La Côte de Rias. La mer le long de cette côte est l'un des meilleurs terrains de pêche au monde. C'est ici que se rencontrent deux courants, l'un chaud, le Kuro-shio, l'autre froid, le courant des Kuriles, avec le courant qui en résulte (front océanique) Ils offrent un endroit qui convient particulièrement aux

poissons. Parmi les principaux habitants du Kuro-shio qui vivent à cet endroit, nous trouvons le maquereau japonais, la sardine, le maquereau commun, la seiche, la sériole, le thon, etc.

Pour la pêche côtière on utilise surtout de petits bateaux de 1 à 5 tonnes, lesquels sont d'une grande utilité pour de nombreuses méthodes de pêche, telles que la pêche à la ligne, la pêche au chalut et au carrellet.

La pêche au filet fixe se pratique depuis déjà bien longtemps à l'entrée des petits bras de mer s'enfonçant à l'intérieur des terres. En ces lieux, les parcs à coquillages et la récolte des algues marines ont aussi une grande activité.

Pesca costera. La zona del mar frente a las costas constituye una de las mejores pesquerías del mundo. La cálida Corriente

Negra y la Corriente Fria Kuril se encuentran en este punto con la corriente resultante (frente oceánico), suministrando un lugar ideal para que los peces vivan en cardúmenes. Las principales especies de peces que viven en esta zona incluyen a la caballa, sardina, jibia, atún, etc., siendo todos estos habitantes de la Corriente Negra.

Actualmente, en las operaciones de pesca costera realizadas por medio de barcos de pequeña envergadura que van desde 1 hasta 5 tons., se emplean activamente varios métodos para la captura de peces, tales como: línea de longitud, red de agalla y red de fondo.

La pesca con redes estacionarias se ha utilizado desde hace mucho tiempo en los estuarios o golfos donde el mar penetra profundamente dentro de la tierra, y donde además se está llevando en forma muy activa el cultivo de ostras, almejas y algas marinas.

ERIC ; Would you request a NAFO estimate of squid off US.  
at present no country is harvesting illex off the U.S. SHOULD ; American add the NAFO quota to U.S.  
Landings OH NMFS WILL NOT ALLOW; MAFMC has no HONEST estimate of squid. will you request a  
NAFO estimate? The Northeast Science Center numbers are what cause the NAFO numbers to be less.

JASON the pre Magnuson number included ALL Illex . With Russians reporting less than 25% The  
Northeast Science Center created numbers without surveys to stop Russian fishing after Magnuson  
Would you please bring to the table the amount of Illex imported to the U.S. SINCE 1976 how to justify  
managing a one year crop? DO SOMETHING TO STOP CHEMICALS ON SURFACE WATER AFFECTING EGG  
OUTER MEMBRANE ASK SCIENCE WHAT A SURFACENT DOES TO THE MEMBRANE AROUND THE EGG.  
ASK U.S. STATE DEPARTMENT IF state asked the Council to increasing the price of squid so imports will  
receive better price?

WHAT ARE THE TOTAL IMPORT NUMBERS FOR SQUID? COULD THE FREEZER BOATS WORK IN GULF OF  
MEXICO on illex ?

STATUS QUO E!

DID ANYONE MENTION JIGGING?

--

James Fletcher  
United National Fisherman's Association  
123 Apple Rd.  
Manns Harbor, NC 27953  
252-473-3287

From: **Steve Follett** <[supafo@aol.com](mailto:supafo@aol.com)>

Date: Fri, Mar 1, 2019 at 12:04 PM

Subject:

To: <[nmfs.gar.illexpermitandgoals@noaa.gov](mailto:nmfs.gar.illexpermitandgoals@noaa.gov)>

My name is Steven Follett i own the Heatherlynn permit no 410327 i have been fishing for 48 years i have a illex permit Moritorium. The last few years illex aquid have been more valuable and closer to my fishing grounds i have spent money on making my boat to carry and keep the fish in good shape safely I have purchased new gear to be ifficent and profitable .We have lost other fisheries we cant afford to lose any more. I think the permit should stay the way it is Status Quo WE cant afford to lose any More Thanks Steven Follett FV



Dear MAFMC,

I am writing to state my opposition to any further requalification in the Illex fishery as this fishery is already a limited access fishery.

People who currently hold permits should not be at risk for losing any of them. I am against limiting access to fisheries in general.

Philip Merris - Captain F/V EXCALIBUR

Philip Merris -

Dear MAFMC,

I am writing to state my support for "Status Quo" in the Illex fishery, I am against requalification.

I have already qualified in the past for my Illex permit and shouldn't have to repeatedly be subjected to requalification for a permit I've already qualified for. Illex is an important part of my income and I don't want to lose access to this fishery. Having access to a variety of species is important to the industry and the success of my business.

Thank you,

Steve Follet

A handwritten signature in black ink that reads "Steve Follet". The signature is written in a cursive style with a long horizontal flourish extending to the right.

F/V Heather Lynn

Dear MAFMC,

I oppose any further requalification in the Illex fishery.

Our permit has already qualified once, and we shouldn't need to qualify again. People who currently hold permits should not be at risk for losing any of them. We are against limiting access to fisheries in general.

Thank you,

Jeff Wise

A handwritten signature in black ink that reads "Jeff Wise". The signature is written in a cursive style with a large, stylized "J" and "W".

FV Lightning Bay



Dear Dr. Moore,

I support status quo for Illex fishery.

Our permit was an investment and the possibility of losing our permit through requalification would have a negative impact on my vessel and crew.

I do not support any requalification of the permits. We've qualified once and we shouldn't have to worry about losing access again.

Thank you,

Kevin Ralph

FV Rebecca Mary

CAPT. *Kevin Ralph*  
CREW *John Baker*  
*H. Gantz*

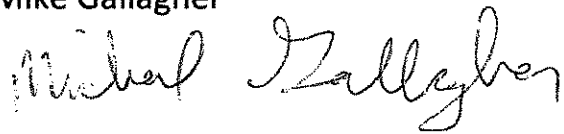
Dear Dr. Moore,

I am writing to state my support for "Status Quo" in the Illex fishery.

Being able to continue to have access to Illex is important to my and my crews lively hood. Our permit has already qualified for limited access and we should not be at risk at losing the permit or equal access to the resource. Therefore, I am against any further requalification of this permit.

Thank you,

Mike Gallagher

A handwritten signature in black ink that reads "Michael Gallagher". The signature is written in a cursive style with a large initial "M".

F/V Susan Rose

Illex has become a desired food fish with a growing market . We have invested in this market with boats and gear to catch and process this product creating jobs shoreside and at sea. There has not been a stock assement done on illex so this becomes guesswork at best when determining a sustainable quota .I feel the quota could be doubled without any significant change to the ssb. This would allow boats to fish a full season and stop the this is mine mentality it is creating .I do not agree with a requalification. We did this years ago in good faith. The market is much better now, so the few that couldnt afford to go can .Therefore I'm in full support of the status quo.

Respectfully, Michael Hall

A handwritten signature in cursive script that reads "Michael Hall".

Jason

Thank you for your explanation of the process and current issues regarding the Scoping Process for Illex squid. The RI Saltwater Angler Association is an organization of recreational anglers with over 7500 affiliated members. We are very interested in this process primarily because of the importance of these species as forage for the many fish that we more directly target. We do also, on occasion target these species for both food and as bait.

In general our comments are that the life cycle and stock size of all of these species needs to be understood first and then an ecosystem based management process needs to be followed to assure that these important forage fish are available for the rest of the food chain before a meaningful quota for commercial harvest can be set.

Please keep us informed relative to progress on this matter.

Thank you,

Rich Hittinger

1st VP

RI Saltwater Anglers Association

From: **Jean Public** <[jeanpublic1@yahoo.com](mailto:jeanpublic1@yahoo.com)>

Date: Tue, Feb 19, 2019 at 2:30 PM

Subject: Fw:public comment on federal register commercial fishermen put in lying fake reports and the program is fraudulent because of that

the management of species by this agency has been to manage their decline, their extinction of being on earth; the total capitulation to the profiteering and lying of the commercial fish establishment has allowed far too great allowances to be allowed by this commercial catering agency. you do what the commercial fishermen want. you are afraid to stand up for the general public. the lax "management" that the public gets from you is extinction of species. most of which are already almost all gone.

i also see no reason for you to be physically going to Gurneys Inn and other sites for evening meetings when webinars are available for all to all in, including environmentalists. these trips around the country cost a lot of money and taxpayers are paying for them. commercial fishermen are not paying for them. the taxpayers of this country are paying for your expensive stops at posh hotels. it's time to go to webinar and make recordings of what is said by whom. this comment is for the public record. those recordings should then be posted on the web for all to see and hear. all of us want to know what is happening to our fish species. this comment is for the public record. please receipt. Jean Public Jean [pubilc1@yahoo.com](mailto:pubilc1@yahoo.com)

From: **Patrick Knapp** <[pknapp@towndock.com](mailto:pknapp@towndock.com)>

Date: Fri, Mar 1, 2019 at 4:04 PM

Subject: illex permitting

To: [nmfs.gar.illexpermitandgoals@noaa.gov](mailto:nmfs.gar.illexpermitandgoals@noaa.gov) <[nmfs.gar.illexpermitandgoals@noaa.gov](mailto:nmfs.gar.illexpermitandgoals@noaa.gov)>

Cc: Patrick Knapp <[pknapp@towndock.com](mailto:pknapp@towndock.com)>

I am writing to express my concerns about the limited entry considerations in the illex fishery, particularly the consideration of the introduction of catch shares. I can understand the concerns of historical freezer participants, but the abysmal record of the effects of catch shares are well known. Not only that, there is zero biological impetus for implementing these restrictions. Little is known about the Illex biomass, other than that is extremely plentiful and increasing in value. There is very little, if any, chance that any new entrants would invest the 15+ million dollars required to build a serious RSW illex boat that would present any real threat to the quota. Therefore, even a cursory amount of research would show that the major catalyst for such a drastically restrictive measure would be to inflate the value of the historical high landing permits prior to sale. This is not to say these fishermen should be marginalized—they caught the fish and earned the right. However, with no real biological reason to restrict the fishery, even a cursory search shows that realigning the permits will almost certainly result in these permits, and this fishery, ending up in the hands of a foreign concern. There is no real need to restrict the fishery at this time.

Patrick Knapp

F/V Conor and Michael

401-569-4828

02/21/19

To whom it may concern,

My name is Hank Lackner , I am the owner and operator of Illex squid vessel Jason & Danielle. My vessel has been one of the top 5 producers of Illex squid for the last decade. We have continued to fish through times of low abundance as well as poor prices to keep our infrastructure and markets viable. In fact, there were even seasons we operated at a loss just so we keep our world market share.

I am writing this letter to ask the council to Please consider a requalification of Illex squid permits. Latent effort is a real threat to this fishery and the traditional user group needs protection.. Recent cutbacks to the herring and mackeral quota can potentially lead to large vessels shifting effort into this very fragile fishery. As we know, the ilex fishery has closed early in both 2017 and 2018.. 2017 highlighted the fact that the TRADITIONAL VESSELS CAN CATCH THE TAC. Availability is the key! Higher prices as well as availability has led to the activation of more permits the last two seasons.

The chart provided in the scoping guide highlights the exponential increases in effort. In 2015,5 boats landed Illex squid.. In 2016 12 boats landed Illex squid..In 2017 effort almost doubled to 20 boats!! 2018 saw another 50% increase in effort!!31 vessels and a two month season!!!!

As the number of vessels increase, the council should be asking themselves about BYCATCH issue. Unskilled new entrants may encounter Marine Mammals, butterfish or Chubb Mackerel.

Council members should also ask themselves when the fishery continually closes early, where will the traditional offshore vessels go and what will they fish for.. That answer is simple, we will head to the beach and target Loligo squid! Putting unneeded pressure on inshore stocks!

The original qualifier to obtain an Illex squid permit was nothing more than 5 trips of 5000lbsbetween 1981 and 1993. The ilex fishery is a tonnage fishery, those numbers represent bycatch.. In fact the incidental possession limit is higher than the qualifier (10,000 lbs). this proves that 5000lbs is not the correct number to use as a qualifier.

I am hoping the council will adopt a limited entry program that will follow a tiered format.

For full time access , a vessel should be required to have landed 5 trips of 50,000 lbs prior to the control date as well as 5 trips of 50000lbs after the control date..That would show the vessel is truly a squid boat

If a vessel only met one of the requirements, that is landings before or landings after they would be given a lower tiered permit with a trip limit in the 30,000lbs range.. vessels with no landing would remain at the 10,000lbs incidental limit.

Thank You,

Hank Lackner



*Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries*

April 12, 2019

Dr. Christopher M. Moore  
Executive Director  
Mid-Atlantic Fishery Management Council  
By email: [nmfs.gar.illexpermitandgoals@noaa.gov](mailto:nmfs.gar.illexpermitandgoals@noaa.gov)

Re: Illex Permits and MSB Goals and Objectives Amendment – Scoping Guide

On behalf of the 150 employees of our family-owned seafood business and the independent fishermen supplying seafood to our processing facility in Cape May, New Jersey, thank you for the opportunity to comment on the Council's scoping process relative to latent effort in the Illex fishery and the MSB plan goals and objectives.

Our comments will be brief at this time and respond, generally, to the list of approaches suggested in the scoping guide:

Goals and Objectives of the MSB FMP

We do not support rewriting the FMP objectives to match those developed recently for the Chub Mackerel FMP, after chub was removed from the list of species proposed to be managed under the Council's Unmanaged Forage Fish amendment. The current Goals and Objectives should be amended to add language used in the recent Loligo amendment (A20), relative to the concerns about latent effort in the Illex fishery.

Requalification of permits:

We support the Council moving ahead with eliminating latent permits in the fishery. It appears that half of the moratorium permits held today have no fishing history. This is where the amendment should primarily focus. In requalifying permits, the 1997-2013 baseline should be used and historic investment in vessels and shore side facilities should be a primary consideration, along with community dependence on the fishery. The staff alternatives outlined in the Loligo DEIS, other than the 200,000 pound qualifier which appears to limit active permits, seem like a good place to start in developing qualifying options in this amendment. We do not support averaging catches over a period of time to develop qualifying alternatives.

Tiered Limited Access System

While it is important to eliminate latent permits, it is also important to allow vessels who have landed Illex in recent years to remain in the fishery, in order to help support a fleet of vessels capable of catching the quota. A tiered system could provide those who entered the fishery after the control date some, limited, future access to the fishery.





*Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries*

Consideration of needs of freezer trawlers versus refrigerated seawater trawlers

We do not believe this issue is one that is appropriate for Council consideration. However, since the Illex fishery is a volume fishery, we support hold capacity measurement and limits similar to those developed for the Atlantic mackerel fishery.

LAPP / IFQ / ITQ

We do not support the amendment developing an ITQ or CDQ allocation in the Illex fishery. Considering an allocation scheme like these would slow down the Council's ability to analyze the permit requalification issues in a timely manner.

###

Thank you for your consideration of our initial comments on the proposed amendment.

We look forward to continuing to be involved in the process if the Council agrees to move ahead with the amendment at their June meeting.

With best regards,

*Wayne Reichle*

Wayne Reichle, President



Wednesday April 10, 2019

Dr. Christopher M. Moore  
Executive Director, MAFMC  
800 North State Street, Suite 201  
Delaware, MD 19901

**RE: *Illex* Permits and FMP Goals Amendment Scoping Comments**

Dear Dr. Moore,

Thank you for the opportunity to publicly comment on the possibility of modifications to the *Illex* squid permitting system, as well as revisions to the goals and objections for the Mackerel, Squid, Butterfish (MSB) Fishery Management Plan (FMP).

I am writing this comment on behalf of Northern Pelagic Group, LLC "NORPEL", a fish processing facility located in New Bedford, MA. NORPEL was established in 2002, primarily as a pelagic (herring and mackerel) processing facility. Since 2012, NORPEL has provided contract freezing services to the summer *Illex* squid fishery for vessels and squid processing companies based in Massachusetts, Rhode Island, Connecticut, New York and New Jersey.

Additionally, NORPEL has acquired an *Illex* squid permit to be used by the fishing vessel Nordic Explorer, which will begin fishing for *Illex* squid during the second trimester of 2019.

As an employee for a company directly involved in the *Illex* squid fishery, I am fearful that any modifications to the current permitting system could have negative socioeconomic impacts to the region. Modifications to the permitting system will certainly lead to reallocation of permits, quota and landings to areas in which processing *Illex* is not feasible for NORPEL or the Rhode Island fleet. NORPEL relies on the geographic and spatial diversity of the *Illex* squid fishery and fishing fleet. Modifications to the current system will, without a doubt, disrupt this diversity and have tremendous negative impacts on the region.

I urge the Council and the Committee to consider the following points and the negative impacts outlined above when determining the future of the *Illex* permitting system:

1. NORPEL has invested significant financial resources in the *Illex* squid fishery including a permit for the Nordic Explorer, boat and gear renovations to the Nordic Explorer and plant updates.
2. NORPEL employs over 50 men and women full time from the New Bedford area. The summer *Illex* squid fishery allows NORPEL to retain employees throughout the summer months, when NORPEL has traditionally closed.
3. Due to the complimentary seasonality of herring, mackerel, squid and butterfish, the *Illex* squid fishery assists in providing year long employment to many fishermen and shoreside workers.
4. The *Illex* squid fishery supports the vibrant economy of thousands shoreside workers and hundreds of businesses including net and gear manufacturers, diesel mechanics, ice houses, packaging suppliers, cold storage facilities and logistics companies in the New Bedford region.

As mandated by the Magnuson-Stevens Fishery Conservation and Management Act, NOAA Fisheries has developed guidelines for each National Standard. The National Standards are principles that must be followed in any fishery management plan to ensure sustainable and responsible fishery management. If the Council were to modify the



current *Illex* squid permitting system, they would do so in potential violation of National Standards 4 (Allocations), and 8 (Communities).

Under National Standard 4, *Conservation and management measures shall not discriminate between residents of different states. If it becomes necessary to allocate or assign fishing privileges among various United States fishermen, such allocation shall be (a) fair and equitable to all such fishermen; (b) reasonably calculated to promote conservation; and (c) carried out in such manner that no particular individual, corporation, or other entity acquires an excessive share of such privilege.* By implementing a new permitting system, much of the fishery, which is currently geographically distributed throughout the East Coast, would be consolidated to a significantly smaller region. The fisheries based in Rhode Island and Massachusetts would truly suffer.

Under National Standard 8, *Conservation and management measures shall, consistent with the conservation requirements of this Act (including the prevention of overfishing and rebuilding of overfished stocks), take into account the importance of fishery resources to fishing communities by utilizing economic and social data that meet the requirement of paragraph (2) [i.e., National Standard 2], in order to (a) provide for the sustained participation of such communities, and (b) to the extent practicable, minimize adverse economic impacts on such communities.* By implementing a new permitting system, there would be a great loss of economic activity in the Rhode Island and Massachusetts regions, as outlined above. Not only would the companies directly involved in the fishery suffer, there would be a negative impact on all the related shoreside workers and businesses. Many of these companies rely on the *Illex* fishery as it often bridges the gap between Spring and Fall fisheries.

The main goal and objective of the MSB FMP should be to determine an accurate and real time Spawning Stock Biomass (SSB) Annual Catch Limit (ACL) for the *Illex* fishery that takes into consideration the squid's extremely short lifespan and highly migratory pattern. The issue at hand with the *Illex* squid fishery is not one of allocation. I believe all Council and Committee effort should be focused on completing a scientifically acceptable stock assessment for *Illex* squid. This will greatly assist in setting the Allowable Biological Catch (ABC) and reaching Optimum Yield (OY). Upon completion of a successful and scientifically accepted stock assessment, when we have satisfied National Standards 1 (Optimum Yield) and 2 (Scientific Information), the Council and Committee should direct their resources to making management decisions for the *Illex* squid fishery.

Thank you very much for your consideration of our comments. Should you have any additional questions, please feel free to reach out to me.

Sincerely,

A handwritten signature in black ink, appearing to read "Brendan Mitchell", written in a cursive style.

Brendan Mitchell

Dear Mr. Moore,

We are not in support of the requalification of the illex permits. My company was negatively affected by the requalification of longfin squid and we don't want to see any fleet further reduced by means of requalification.

These frequent requalification efforts do nothing but harm the industry as a whole in order to benefit the few.

Thank you,

David Parsons  
DJ's Seafood, Inc.

A handwritten signature in blue ink, appearing to read "David Parsons", written in a cursive style.



100 Davisville Pier  
North Kingstown, R.I. 02852 U.S.A.  
Tel: (401)295-2585

April 4, 2019

Mid Atlantic Fisheries Management Council  
800 N. State St. 201  
Dover, DE 19901

### **Re: Illex Permits and MSB Goals and Objectives Amendment Scoping Comments**

#### **A. Illex Permits**

We appreciate the Council undertaking an Illex Permits Amendment to address latent effort in the illex fishery and support limiting access for permits without directed fishing history prior to the 2013 control date. Utilizing the 2013 control date preserves the characteristics of the directed fishery prior to speculative entry by previously inactive vessels, which has led to unprecedented fishery closures in the last two years. Consistent with the requalifying period used for the recent Squid Amendment, we support using 1997-2013 as the amendment qualifying period, to ensure historic participation in the directed fishery is accounted for. The directed fishery is a high tonnage fishery comprised of, throughout its history, a handful of vessels. During most years since 1996 to 2015, most of the landings were harvested by 6 to 15 vessels, according to the SSC's 2018 report.<sup>1</sup> These vessels have the capacity to harvest the quota in years of high availability, such as 2017 and 2018, and are those that have built the domestic fishery over decades following the exit of the foreign fleets, for which we also advocated. Only 20 vessels of any participation level closed the fishery in September of 2017, and 31 in August of 2018, for a fishery that typically extends into November for Seafreeze vessels. This cannot continue to the detriment of historic participants.

Seafreeze vessels have participated in the directed illex fishery every year for over 30 years, built and sustained markets, developed infrastructure, and consistently spent more of our fishing year directing on illex than on any other fishery. Due to the influx of previously latent effort in the last two years, leading to fishery closures in September and August, our vessels have been tied to the dock for months at a time without other available fisheries. Historic participants who created the fishery, the markets and associated infrastructure should not be essentially kicked out of the fishery that they created by new entrants with no directed fishing history.

We support a permitting system that is consistent with a permit holder's participation in the fishery prior to the control date. Vessels with a history of directed illex landings during the qualifying period should possess a different permit than those with only incidental landings, or no landings at all. A high tonnage fishery should require a high tonnage qualifier, to distinguish directed participants from incidental and non-active participants. According to previous analysis in the Squid Amendment, only 37 out of 79 total illex permits (less than half) had landings over 10,000 pounds in any year from 1997-

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<sup>1</sup> See

[https://static1.squarespace.com/static/511cdc7fe4b00307a2628ac6/t/5ad7b1f8562fa75adb8ba50a/1524085242200/Illex+illecebrosus\\_data\\_update\\_report\\_for\\_2018\\_MAFMC\\_SSC\\_ABC\\_meeting.pdf](https://static1.squarespace.com/static/511cdc7fe4b00307a2628ac6/t/5ad7b1f8562fa75adb8ba50a/1524085242200/Illex+illecebrosus_data_update_report_for_2018_MAFMC_SSC_ABC_meeting.pdf), p. 2.

2013.<sup>2</sup> We would ask the Council to keep in mind that 10,000 lbs is the trip limit for vessels which do *not* even possess an illex permit. Therefore, more than half did not even have an incidental landing, much less a directed landing, for the 15-year period. If availability continues to increase and prices continue to rise, and should these permits all continue to possess unrestricted access to the fishery regardless of historic participation level, there will be no fishery left for those who built and have relied on this fishery for decades. A restructuring of permits will not create negative economic impacts on those participants, as they have never relied on this fishery as a source of income, but inaction will cause significant detrimental impacts on vessels which do rely on this fishery as a constant source of income. It is important for the Council to know that vessels without an illex permit were able to direct on the 10,000 lb incidental limit in 2018, because high prices now make this financially viable for some vessels.

We therefore request that the Council analyze multiple options to explore what a different permitting structure would look like for the illex fishery. We support analyzing an ITQ system, as such analysis will demonstrate to Council members what historic participation has truly occurred, by what number of vessels and at what levels. We also support analyzing a tiered permitting system for the existing limited access illex permits, as currently exists for the only other federal high tonnage fisheries on the East Coast, herring and mackerel. A top tier permit would be reserved for historic illex fishery participants, who have participated in the directed fishery over time, and would retain unlimited access to the fishery. For a top tier permit, we support exploring the following qualifiers: 1 million lbs of landings from 1997-2013 control date, 2 million lbs from 1997-2013, 3 million lbs from 1997-2013. A middle tier permit would be reserved for those permits with some amount of landings from 1997-2013 but who do not qualify for a top tier permit, and would be associated with an appropriate trip limit. This trip limit would need to be less than the minimal viable trip size for any top tier vessel and should be reflective of participation levels compared to top tier permits. A bottom tier permit would be reserved for those little or no landings and would be associated with minimal trip limit. Analysis of these two approaches should provide the Council with an informed approach moving forward.

Both approaches would also decrease the chance of speculative vessel purchases or alterations by new entrants, particularly now that upgrade restrictions with respect to vessel tonnage have been removed. Both approaches also provide continued access to the fishery for all permit holders.

## **B. MSB FMP Goals and Objectives**

New Proposed for FMP:

1. Maintain sustainable stocks, prevent overfishing, and achieve and maintain sustainable biomass levels that achieve optimum yield in the fisheries and meet predator needs, while acknowledging environmental variables and drivers.
2. Maintain viable fisheries and fishing communities.
3. Allow opportunities for commercial and recreational fishing, considering the opportunistic nature of the fisheries, changes in availability that may result from changes in climate and other factors, and the need for operational flexibility.
4. Provide the greatest degree of freedom and flexibility to all harvesters of these resources consistent with the attainment of the other objectives of this FMP.
5. Increase understanding of the conditions of the stocks and fisheries and promote opportunities for industry collaboration on research.

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<sup>2</sup> See

[https://static1.squarespace.com/static/511cdc7fe4b00307a2628ac6/t/58f76612f7e0ab3d069cfe64/1492608534010/Squid+Hearing+Doc+2017\\_04\\_18.pdf](https://static1.squarespace.com/static/511cdc7fe4b00307a2628ac6/t/58f76612f7e0ab3d069cfe64/1492608534010/Squid+Hearing+Doc+2017_04_18.pdf), p. 75.

6. Maximize US fishing opportunities by making extra quota available to the US fishery if other areas outside our jurisdiction underharvest scientifically developed quota on the same cross-border stocks, in absence of international agreements.

Thank you for the opportunity to comment.

Sincerely,  
Meghan Lapp  
Fisheries Liaison, Seafreeze Ltd.



April 4, 2019

100 Davisville Pier  
North Kingstown, R.I. 02852 U.S.A.  
Tel: (401)295-2585

Mid Atlantic Fisheries Management Council  
800 N. State St. 201  
Dover, DE 19901

Re: Illex Permits Amendment Scoping Comments






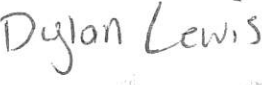



Dear Council Members,



We, the undersigned captains and crew of the F/V Persistence and F/V Relentless, support moving forward with the Illex Permits Amendment and limiting access for permits without directed fishing history prior to the 2013 control date. Half of our fishing year has always consisted of directed illex fishing- in good years, bad years, when prices were low, etc. The past two years, unprecedented illex fishery closures have occurred in September and August due to an influx of new entrants into the fishery. That resulted in our vessels being tied up from the closure date until late October/early November, with no other fisheries available to us, and no income coming in. We cannot afford to continue to lose access to a fishery we have participated in every year since the 1980s and have our vessels tied to the dock for months at a time. Vessels with little or no directed illex fishing history prior to the control date, or those possessing only incidental illex harvest, should not have the same access as vessels such as ours who built the directed illex fishery over multiple decades, developed markets, and continued to supply product even when prices were low and harvests/markets variable. Historically, only a small number of have vessels participated in the directed illex fishery, and we request that the Council protect the access of those vessels which built the fishery by limiting other permit holders to access consistent with their participation in the fishery prior to the control date.

Thank you for the opportunity to comment.

Sincerely,

FV Persistence

  
 Arnaldo S. Furlano  
 Brandon Roan  
 Evan Poppe  
 Dylan Lewis  
 Dylan Lewis  
 Michael Burnham  
 Salvatore Carfano Sr.  
 Monday Dos Santos

 Matt Terry  
 David Morgan  
 Anthony Kernan  
 Brian Stacey  
 Kyle Goodwin



April 4, 2019

100 Davisville Pier  
North Kingstown, R.I. 02852 U.S.A.  
Tel: (401)295-2585

Mid Atlantic Fisheries Management Council  
800 N. State St. 201  
Dover, DE 19901

Re: Illex Permits Amendment Scoping Comments

Dear Council Members,

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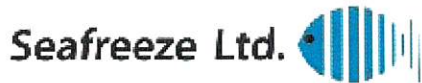
Thank you for the opportunity to comment.

Sincerely,

F/V Relentless

AZIZ BENSOURDA  
Jason Gardiner  
Louis Franstiehl  
David LANGLAIS  
Michael Good  
Cody Henault  
ERIC SPENCER  
Andrew Hall  
marco James

JAMES HUDSON  
Thomas Marshall  
WILLIAM HAY II  
Phil Rühle  
DAVID FIEDLER  
Glenn Goodwin



Feb 4, 2019

100 Davisville Pier  
North Kingstown, R.I. 02852 U.S.A.  
Tel: (401)295-2585

Mid Atlantic Fisheries Management Council  
800 N. State St. 201  
Dover, DE 19901

**Re: Illex Permits Amendment Scoping Comments**

Dear Council Members,

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Thank you for the opportunity to comment.

Sincerely,

*Steve Goodwin*

*Paul Morrison*

*Ed Cahoon*

*[Signature]*

*Rogelio Lara*

*Anthony Kiernan*

*[Signature]*

*Van de Pore*

*Matthew Terry*

*\* Dylan Lewis*

*Mouley H. de S. Santos*

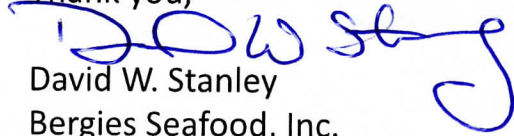
*[Signature]*

Dear Mr. Moore,

We are not in support of the requalification of the illex permits. My company was negatively affected by the requalification of longfin squid and we don't want to see any fleet further reduced by means of requalification.

These frequent requalification efforts do nothing but harm the industry as a whole in order to benefit the few.

Thank you,




David W. Stanley  
Bergies Seafood, Inc.

Dear Mr. Moore,

We are not in support of the requalification of the illex permits. My company was negatively affected by the requalification of longfin squid and we don't want to see any fleet further reduced by means of requalification.

These frequent requalification efforts do nothing but harm the industry as a whole in order to benefit the few.

Thank you,



Norval A. Stanley III  
Bergies Seafood, Inc.



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

Dear Dr. Moore,

I'm writing to oppose any further permit requalification in the Illex fishery. Illex is an integral part of our business that we have made significant investments in. Not only have we purchased permits, but we've added to our fleet, hired additional staff and expanded our customer base and markets. We are also nearing the end of our Marine Stewardship Council assessment for the Illex fishery which was initiated last year.

There has been talk for some time about raising the Illex quota through different mechanisms, whether it be real-time management or looking into gaining some of the NAFO quota. Eliminating participants in the Illex fishery while also looking to increase the Illex quota will hand the fishery over to a small number of individuals and companies, this is not at all fair or equitable. We feel that requalification or tiering out the permits isn't the real solution to the concern a few people hold. In fact, we already have a tiered system when you consider the different vessel's capacity and the fishery is already extremely limited when you consider the number of active permits. Let's continue to explore the subject of raising the quota. This should be the very first step in addressing the issue of reaching the quota in this situation rather than removing people who have already previously qualified to retain this permit.

I've stated this several times in the past and our stance remains the same, that it is an important part of our business strategy to be able to rely on access to a diverse amount of species. Diversity is an important part of sustainability and security and limiting diversity is a risky solution that has the potential to harm so many people in this industry.

Thank you for considering our concerns.

Sincerely,

Katie Almeida  
Fishery Policy Analyst

April 4, 2019

Dear Dr. Moore,

My name is Patrick Hannon, and I am a territory sales representative at The Town Dock.

I oppose any requalification of illex permits. Customers who buy our illex also purchase other squid products from us. I worry that if we cannot supply their demand for illex, they will take their business elsewhere. As a salesperson, this will have a negative impact on my job and ability to provide for my family.

I am asking that you do not make any new limits on the illex fishery.

Regards,  
Patrick Hannon

Dear Dr. Moore

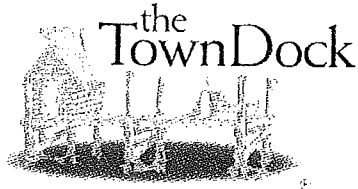
I am writing to state my opposition to any further requalification in the Illex fishery as this fishery is already a limited access fishery.

People who currently hold permits should not be at risk for losing any of them. Businesses have invested significant resources in acquiring the permits, and it is unfair to deny them access to the fishery. Additionally, denying access to our vessels that would use the permit would harm employment in the state.

We are against limiting access to fisheries in general.

Thank you!

William A. Toegemann  
Controller  
The Town Dock



14 March 2019

To: Dr. Moore

Dr. Moore:

I am currently employed by The Town Dock as its Global Procurement Manager and have been working here since February of 2018. I can attest that the requalification efforts currently underway would be extremely harmful to our business.

I support the status quo of Illex permits and do not support the requalification of these permits, as I feel it would be unfair to those who have already made sizable investments in obtaining these permits. Moreover, entire domestic and international supply chains have been established around these items and to disrupt them now at the whim of a minority of stakeholders would be detrimental to our business and positioning in the market.

If the permits were requalified, it would be likely that the employment situation of various people at The Town Dock would be jeopardized, as a significant portion of our 2019 sales strategy hinges on the sale of our Illex items. Not having these items for sale due to a requalification would seriously handicap us in the market.

Thank you,

Manuel Montes  
Global Procurement Manager  
The Town Dock  
Narragansett, RI



ATTN: MAFMC  
RE: *Illex Permit and Goals Amendment*

March 28, 2019

Dear Dr. Moore,

I do not support changing the qualification for the permit.

The Illex fishery is important to my income and a means of livelihood for a substantial number of individuals and families.

The Town Dock is a respected family owned business that contributes significantly to the local and state economy. The company garners international acclaim as the largest supplier of calamari in the United States with suppliers, buyers, and operations located around the world.

The Town Dock is committed to sustainable fishing practices and recently obtained an MSC certification for loligo and is in process for MSC illex, serving as an example for both the industry and fisheries management practices.

Please maintain the current qualifications for Illex permits.

Sincerely,

Vanessa Anderson  
International Logistics Coordinator II  
The Town Dock

Dear Dr. Moore,

I support the status quo for illex permits. Fair permits are the foundation on which The Town Dock and their employees has been built. There is no justification in changing what has been working for years.

Permitting should NOT be changed, it is fair as it is.

Our fishermen/women have worked hard to follow all rules and laws in order to keep their livelihood alive and it is not fair to take their permit.

Thank you,

Susan Morgan  
A/R Assistant



April 8, 2019

Dear Council Members,

I am the founder of The Town Dock and owner of several Illex Permits on active fishing vessels. I have been involved in the fishing industry and squid industry for the last 45 years, and I strongly recommend that the council keeps the illex permitting system as-is with no changes to the current management plan.

I do not believe that requalification, ITQ's, or tiers are necessary. If implemented, they will have a negative impact on my fishing vessels and the company that I founded. The Illex permits are already limited to a few number of vessels. I have spent millions of dollars on my vessels and tiering a fishery like Illex Squid will box out many active permit holders and turn the entire quota over to a select few. This is not an acceptable outcome for my team, my vessel captains and crews, and our future.

Thank you for the opportunity to provide comment.

Sincerely,  
Noah G. Clark

Founder

Dear Dr. Moore,

My name is Sean Healy and I recently got a job at The Town Dock as an international purchasing assistant after receiving my degree in Business Admin.

I am writing to you because I support the status quo of Illex fishing permits. Many jobs have been created due to our growth, (including mine as there was only one international purchasing assistant before I started) which can directly correlate with the expansion of our fleets and acquisition of Illex permits which supply one of our most popular products, our "Premium" illex calamari line.

The requalification of permits would negatively impact many of these jobs that have been created.

Thank you,

Sean Healy

April 5, 2019

Dear Dr. Moore,

I am opposed to the requalification of Illex permits and support the status quo.

I work for The Town Dock in Narragansett in the Human Resources Department. Illex plays is a key piece to our business and many jobs have been added to the company to support this effort. The new jobs represent areas throughout the company, such as: dock workers, production, sales, marketing and other support roles. I am concerned that we may lose jobs if the status quo is not maintained.

Thank you for considering my point of view.

Sincerely,

Shannon Sweeney Saunders

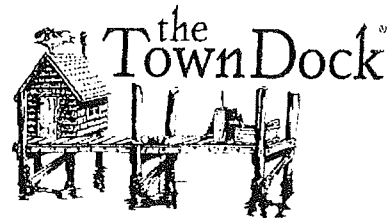
The Town Dock

45 State Street

Narragansett, RI 02882

401-789-2200 ext. 196





April 9, 2019

Dear Council Members,

Thank you for the opportunity to provide feedback.

As the owner of several active fishing vessels with Illex Squid permits and shoreside processing facilities dedicated to squid processing, I urge the council to keep the illex permitting system as-is with no changes to the current management plan.

My key thoughts are as follows:

- Illex permits are already strictly limited to a small number of vessels, especially when compared to Longfin permits.
- I am concerned that Requalification, ITQ, or Tiers will consolidate the fishery even further, potentially to very few players controlling the entire quota and ex-vessel pricing. This seems contrary to the MSB FMP's objectives, specifically the second and third objectives that speak to promoting growth of the US fishery and providing the greatest degree of freedom and flexibility to all harvesters of this resource.
- We have invested several million dollars into our Illex permits and fishing vessels, and further permit restrictions will have a negative impact on our business and will limit the amount of illex that our boats can harvest.
- We are developing new markets for Illex squid, and further permit restrictions will limit access to the fishery and potentially restrict us from harvesting Illex for our customer base.
- New limitations on Illex permits will negatively impact not only our vessels and crews, but also our shoreside processing facilities.

Thank you for considering my comments.

Sincerely,  
Ryan Clark

*April 3, 2019*

*Dear Dr. Moore,*

*My name is Aaron J Ferri, and I am the New England Territory Manager for frozen products at The Town Dock.*

*I support 'Status Quo' regarding the Illex fishery and oppose requalification of illex permits.*

*This species has seen a boom in foodservice over the last few years as it proves chefs with another 'Product of USA' option. Any changes to illex permitting could negatively affect many restaurant operations that rely on us to supply them with this product.*

*Additionally, a change in permitting will have a widespread, negative effect on several vessel owners, processors, foodservice distributors, restaurants, retailers and ultimately end consumers. Personally, it will also hurt my ability to provide for my family.*

*Thank you for your time.*

*Sincerely,*

*Aaron J Ferri*

*Town Dock employee for over 17 years.*

295 Kent Dr  
East Greenwich, RI 02818

March 26, 2019

Dear Dr. Moore,

I am writing to state my opposition to any further requalification in the Illex fishery as this fishery is already a limited access fishery.

I work for the Town Dock as the Executive Assistant to our President and CEO, Ryan Clark. The customers who buy illex not only count on us for it, but they also purchase other products from us and I worry that if we don't have illex they will take their business somewhere else. I am asking that you do not make any new limits on the illex fishery.

With any wild caught species, you never know if you'll have a great year or a bad year, so it is important to the vessels and to my company to have many options available for catch and purchase.

Yours sincerely,

AnneMarie Gibson  
Town Dock employee

March 25, 2019


To Whom it May Concern:

My Name is Bill Feltch. I'm with Town Dock and I'm the Director of Quality Assurance. I support the status quo for access to the illex fishery.

The Town Dock is a true custodian of this fishery. We have invested hundreds of thousands of dollars to support the sustainable harvest of illex as well as developed a US market for this species, as food.

With Marine Stewardship Council certification, we support the health of our oceans through sustainable fisheries practices so this great food source will be here for generations.

Thank You,

A handwritten signature in black ink, appearing to read 'William S. Feltch', with a stylized flourish at the end.

William S. Feltch



3/25/19

Dear Dr. Moore,

I am a staff accountant at the Town Dock and am the bookkeeper of the company's eight fishing vessels, several of which we have Illex permits on. I am writing to state my support for status quo of the Illex Fishery.

Requalification would not only impact the company as a whole but myself directly as my job pertains to our vessels being able to go out and catch Illex with the permits that were purchased.

Thank you,

Brendan Rogers

March 21, 2019

Dear Dr. Moore:

I could not come to the previous in-person hearings but want to support 'status quo' for illex permits. With any wild caught species, you never know if you'll have a great year or a terrible year, so it is important to the vessels and to my company to have many options available for catch and purchase.

Furthermore, The Town Dock is leading the way in certifying the illex fishery as sustainable by the Marine Stewardship Council. We are committed to this species.

Thank you,

Camie Cox

The Town Dock

QA/QC Coordinator

March 22, 2019

To Whom It May Concern,

My name is Cathy Harvey. I am the Accounting Manager at The Town Dock. I have over 30 years of experience working with the commercial fishing fleet and have seen the devastation overregulation can cause.

Illex is an important part of our business. Our company has invested heavily in research, development, processes, and people to support its growth. We are leading the way in certifying the illex fishery as sustainable by the MSC.

I support independent fishermen who sell us their illex. They will lose out if their permits are limited. Requalification squeezes out the competition for a few large fishing vessels. That does not seem fair.

I support the status quo and oppose the requalification of illex permits.

Sincerely,

Cathy Harvey

The Town Dock  
74 Railroad Avenue  
Johnston, RI 02919  
cramos@towndock.com  
401-789-2200

Friday, March 15, 2019

Dear Dr. Moore,

I am writing to state my opposition to any further requalification in the Illex fishery as this fishery is already a limited access fishery.

People who currently hold permits should not be at risk for losing any of them. We are against limiting access to fisheries in general. This will only reduce competition and we rely on the competition to get fair prices for products we buy. Let the market do its job. The Illex fishery is already very limited as it is. Not only would this change put a strain on local jobs because it would be one less thing we can fish for, our customers would now take their business somewhere else to buy this product.

Sincerely,



Chris Ramos  
Plant Manager



Dear Dr. Moore,

I am in opposition to requalification of illex permits. As a recent hire of The Town Dock, I am a direct beneficiary of the expansion of our business occurring currently. Without certain revenue channels such as our illex, I may or may not have my current position here at the Town Dock. I am also in support of independent fisherman and against limited permits for such fisherman as it would negatively affect their business.

Sincerely,

Chase Almond

Dear Dr. Moore,

I am writing because I support the status quo and oppose requalification in the illex fishery. I work for the Town Dock as the back dock manager. I feel that changing the status quo could lead to less through put for our dock which would lead to layoffs for myself and members of my crew.

Sincerely ,

Daniel Francis

March 29 2019

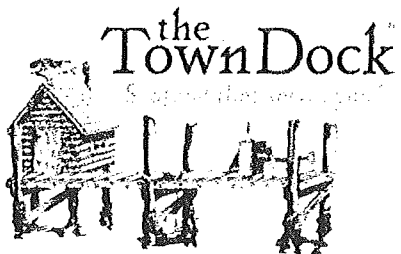
Dear Dr. Moore,

I am writing to state my support for "status quo" in the illex fishery.

Illex is an important part of our business. Our company has spent a lot of money to support its growth as a product. Requalifying permits mean our investment has simply disappeared!

Plus, requalification means almost no competition for a few large fishing vessels, and that's not fair for other vessels.

Thank you,



**Erin DuBois**

Fresh Purchasing & Sales Coordinator

45 State Street, PO Box 608 • Narragansett, RI 02882 USA

Tel: 401-789-2200 x182 • Cell: 401-632-8989

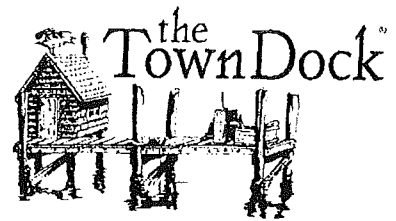
[edubois@towndock.com](mailto:edubois@towndock.com) • [www.towndock.com](http://www.towndock.com)

To Whom It May Concern,

My name is Heather Ford and I am the IT Operations Manager at the Town Dock. I support the status quo and oppose the requalification of the illex permits. Illex is an important part of our business and changes will impact not just people at the dock but also people who work in the office like me.

Sincerely,  
Heather Ford





April 9, 2019

Dear Council Members,

As the HR Director for The Town Dock, and part of a long-time seafood industry supporting family, I recommend that the council keeps the illex permitting system as-is with no changes to the current management plan.

Excluding active permit holders, or limiting them through tiers, requalification's, or ITQ's would be detrimental to our company and our employees. There are many programs built around illex squid that would be in jeopardy, and limitations would jeopardize jobs. This also includes the illex fishing vessels that our company supports, and my family owns.

Thank you for the opportunity to provide comment.

Sincerely,  
Holly A. Clark  
HR Director

I am Jeanne Burke and am a Human Resource Generalist @ The Town Dock. I support the status quo of illex permits.

I feel requalification will impact jobs at the Town Dock in a negative way. I do not believe we will be able to financially support the number of employees we have, and this will cause us to eliminate current jobs and cancel out any new opportunities we currently have for the foreseeable future. If I understand the nature of the companies that would most benefit from this change, I do not see new opportunities arising from this change for any employees that we must let go.

The trickle down affect for neighboring communities will definitely be a negative. Loss of jobs will mean less spending in various shops and stores. This niche in this industry is critical to many local families allowing them to be employed year-round. Now, the tourism industry might be their only other option and they would potentially be on unemployment for the better part of the year.


Jeanne Burke

Dear Dr. Moore,

I am writing to state my opposition to any further requalification in the Illex fishery. Our customers who buy illex count on us for it and if our availability decreases, the concern is, we will lose business across the board. My company has added many new jobs to support the sales and marketing of the illex squid. If our access to it is compromised some of these jobs may have to be downsized, leaving myself and my coworkers at risk of being unemployed. I am asking that you do not make any new limits on the illex fishery. The fishery is already a limited access fishery and persons who currently hold permits should not be at risk of losing them.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script that reads "Josephine DeFusco".

Josephine DeFusco  
Inside Sales Coordinator  
The Town Dock

29 March 2019

Re: Illex Permit Requalification

Dear Dr. Moore,

I am writing to support the status quo for illex permits. I attended the hearing in Rhode Island in early February, and based on the information that was provided by the Council (including catch data back into the 1990s), I do not feel that requalification is warranted. There appears to be an ebb and flow from year to year, and the recent catch does not approach the peaks we have seen in the past. It simply does not make sense to me to look at this past year without the context of these historical trends, and I don't think the history holds up the need for requalification at this time.

Additionally, I am a marketing professional who started at The Town Dock in October 2018. The expansion of the marketing team is directly tied to sales goals for our Premium Domestic illex product line.

While I wonder how my job would hold if the illex permits were changed, I worry a lot about the fishermen and women who have invested in permits that are suddenly not worth anything. It's been a difficult time for this industry, especially with projects like Vineyard Wind moving forward. I hope they will not need to worry about illex permits as well.

Sincerely,

Kat Smith

Dr. Moore,

My name is Scott Charlwood and I am the Director of Narragansett Operations and Logistics for The Town Dock.

I oppose any changes to the Illex permit. This will adversely affect operations and our employees at the Narragansett, RI plant. Hours will need to be reduced and possible job losses as well.

Furthermore, our customers who buy illex purchase other products from us. If we don't have illex they possibly will take all their business somewhere else. I am asking that you do not make any new limits on the illex fishery.

Sincerely,

Scott Charlwood  
Director of Operations and Logistics  
The Town Dock  
Narragansett, RI 02882



March 29, 2019

Dr. Moore,

I am writing to state my support for no change – the status quo – to illex permitting.

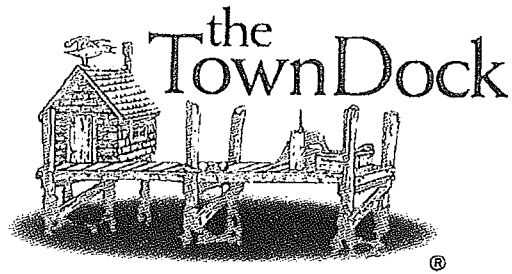
I am the Director of Marketing for The Town Dock in Narragansett, RI, and personally, a change in illex permitting could jeopardize my job security. This is not to mention the countless others who could lose their jobs.

We have invested a great deal of time, money, and effort into building a sustainable domestic marketplace for illex squid. Limiting the ability of The Town Dock fleet to harvest illex for our customers will have a negative impact on our business.

Our domestic foodservice customers rely on us to provide squid from all over the world, so limiting one major species – particularly a domestic one – will have a damaging, lasting effect on our business.

Sincerely,

Patrick Maness



Dear Mid Atlantic Fishery Management Council,

I am writing to oppose changes made to qualification for the illex fishery. Our customers who purchase illex from us not only count on us having available inventory for purchase, these customers also drive sales purchasing a number of other products we offer. We rely on *all* of these sales to satisfy market demand and keep our business profitable.

Illex is an important part of what we do here. We have invested heavily in process and product development as well as acquiring permits that give us access to the illex fishery and adding vessels to our fleet. We have created boat unloading, dock, plant processing and sales positions specifically for our illex line of goods.

I am asking that you do not make any new limits on the illex fishery and I oppose illex permit requalification.

Sincerely,

A handwritten signature in black ink that reads 'Ryan M. Scelsa'. The signature is written in a cursive, flowing style.

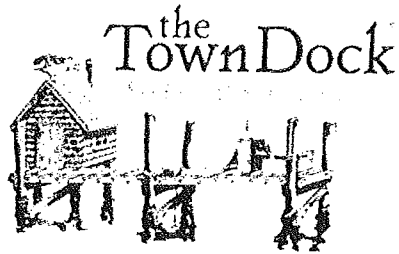
Ryan M. Scelsa  
Assistant Director of Fresh Sales and Purchasing  
The Town Dock, Narragansett, RI

Dear Dr. Moore,

Although I could not attend the Illex Hearing on Monday February 4, 2019, I am writing to state my support for "Status Quo" in the Illex Fishery because it is a wild caught species so catch can change year to year. Additionally, the Illex Fishery is important to my income and would directly impact the quality of life for my family. That being said, it is very important to the vessels and to my company to have many options available for catch and purchase.

Thank you for your time and consideration,

Kyla Murray



March 28, 2019

Dear Dr. Moore,

I oppose any changes to illex permit. Our customers who buy illex also purchase other products from us and I worry that if we don't have illex they will take all of their business somewhere else. It is more convenient to buy from one place than many places. So I am asking that you do not make any new limits on the illex fishery.

Sincerely,

Laurie Izzo

Dear Dr. Moore,

I am writing to state my support for "Status Quo" in the Illex fishery.

I, Lyndsay Owirka, work for The Town Dock as an export sales professional, and I oppose any changes to the current illex permit because our customers count on us for it. If we stop supplying our customers with illex, then we will lose them to the competition after it's taken us years of developing these business relationships.

I am asking that you do not make any new limits on the illex fishery because it will only reduce the competition, which we rely on to get fair prices for the raw material. Let the market do its job. The fishery is already limited so keep the status quo.

Sincerely,

Lyndsay Owirka



March 30, 2019

Dear Dr. Moore,

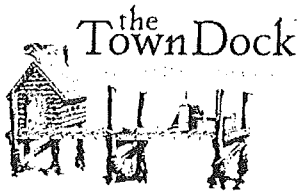
My name is Mark Wollenweber, and I am the Director of Global Seafood Processing with the Town Dock, Inc.

I believe that the equitable action to take regarding Illex catch permitting is to maintain the status quo. To do otherwise would be allowing a few market players to leverage regulations and permitting to protect their own business models. Regulations and permitting should be intended to protect the biomass of Illex as a species.

Illex is a "clean" fishery with virtually no bycatch that is sustainable, and it safely supports many vessels and ancillary businesses across seven states. This is a good thing and should not be allowed to be blocked by a few players attempting to change public fisheries regulations to protect their private business practices.

Regards,

Mark Wollenweber



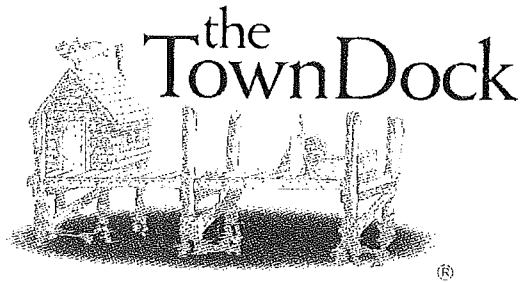
**Mark Wollenweber**

Director of Global Seafood Processing

45 State Street, PO Box 608 • Narragansett, RI 02882 USA

Tel: 401-789-2200 x162 • Direct: 401-203-7765 • Cell: 401-524-6257

[mwollenweber@towndock.com](mailto:mwollenweber@towndock.com) • [www.towndock.com](http://www.towndock.com)



April 2, 2019

My name is Maggie Loffredo and I work for The Town Dock. I oppose the requalification of illex permits. Illex is important to our business. The Town Dock has invested heavily to support its growth. We hope you will take this into consideration when making a decision.

Thank you,

Maggie Loffredo  
The Town Dock

March 12, 2019

Dear Dr Moore,

My name is Matthew J. Meenan and I am the Assistant Dock Manager for the Town Dock. I oppose requalification of illex permits. I feel that requalification would monopolize the illex fishery to a few large fishing vessels, forcing out the competition, which doesn't seem fair. Also, I know this would lead to reduction of product throughput leading to layoffs within my company/ department.

Sincerely,

Matthew J. Meenan

27 March 2019

Dr. Moore,

I am writing to state my support for the status quo of the Illex permitting system. I am the Director of International Purchasing & Sales for The Town Dock in Narragansett, RI. We have worked hard and invested a lot of time and resources in building up an international customer base for Illex.

Requalification could close the door on these relationships and hurt our international business overall. In addition, we have plants and employees geared up for processing and handling the product all the way through the supply chain. Any requalification will greatly upset that planned use of these plants and laborers this year and for years to come. Our business plan and strategy were based on being able to participate in the fishery under current constraints only, and an unanticipated modification will negatively impact our business.

Sincerely,

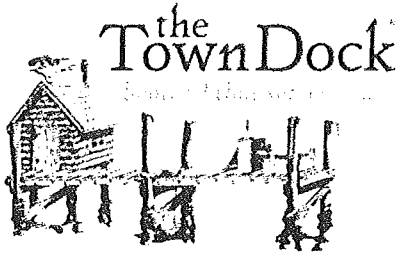
Melissa Chace

Dear Dr. Moore,

I am Michael Parascandolo working for The Town Dock in Fresh Sales & Purchasing. I strongly support no change in the illex requalification's for the following reason.

1. It isn't fair to hurt so many independent fishermen trying to support their family.
2. The Town Dock has invested heavily in illex which created jobs. If we lose this, many workers may get laid off.

Thank you,



## Michael Parascandolo

Fresh Fish Buyer & Sales

45 State Street, PO Box 608 • Narragansett, RI 02882 USA

Tel: 401-789-2200 x134 • Direct: 401-203-7763 • Cell: 401-440-0211

[mparascandolo@towndock.com](mailto:mparascandolo@towndock.com) • [www.towndock.com](http://www.towndock.com)

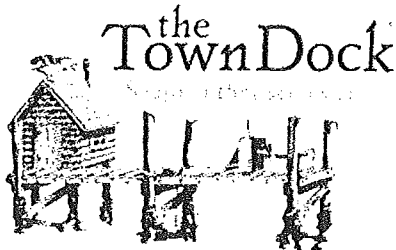


Dr. Moore,

I am opposing the requalification of illex permits. It will negatively impact our customers and it puts my job in jeopardy since I only started at the Town Dock recently and a lot of our sales strategy for this year is selling illex.

Thank you,

Michelle Murray



**Michelle Murray**

Sales Support

45 State Street, PO Box 608 • Narragansett, RI 02882 USA

Tel: 401-789-2200 x163

[mmurray@towndock.com](mailto:mmurray@towndock.com) • [www.towndock.com](http://www.towndock.com)



Dear Dr. Moore,

I'm in opposition for any further permit requalification within the Illex fishery. As the Director of Purchasing and Fresh Sales for The Town Dock in Narragansett, RI, I have seen firsthand how important Illex has been and continues to be for our company. We have invested in procuring permits and have been active in the fishery. We have spent a great deal of time, money, and effort into building a sustainable domestic marketplace for illex squid.

Therefore, limiting our access to Illex will have a damaging, lasting effect on our business.

Instead of restricting access to fisheries we should be promoting growth, equity, and stability for the entire fishing industry, not just a few.

Thank you for taking the time to hear my concern.

Sincerely,

Mike Roderick

A handwritten signature in black ink, appearing to read 'M.R. Roderick', written in a cursive style.

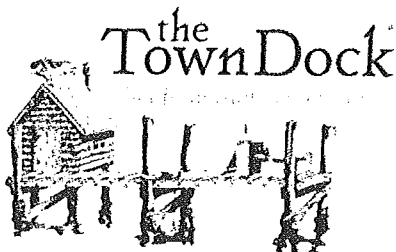
Director of Purchasing and Fresh Sales

March 15, 2019

Dr. Moore,

My name is Mike Wallace and I am part of the sales team at The Town Dock. I am in support of the status quo of illex permits. Illex is an important part of our business. Our company has put a lot of investment into illex. We have many new customers both locally and nationally who have had great success with illex.

Sincerely,  
Mike W



**Mike Wallace**

National Accounts Sales Manager

45 State Street, PO Box 608 • Narragansett, RI 02882 USA

Tel: 401-789-2200 x177 Cell: 401-585-6104

[mwallace@towndock.com](mailto:mwallace@towndock.com) • [www.towndock.com](http://www.towndock.com)



April 4, 2019

Noah C. Clark  
National Accounts Sales Manager  
The Town Dock  
PO Box 608 / 45 State Street  
Narragansett, RI 02882

To Whom It May Concern:

I am opposed to any changes to the Illex fishery.

As a National Accounts Manager, I recognize the importance of this fishery to our continued business success. Our customers who buy Illex purchase other products from us as well. I worry that if we do not have the Illex squid, they will take all their business elsewhere.

I am respectfully asking to keep the fishery as "status quo."

Thank you very much for your consideration.

Kind regards,

A handwritten signature in black ink that reads 'Noah Clark'. The signature is written in a cursive style and is placed over a rectangular area with a light gray, textured background.

Noah C. Clark

**Noah Clark**

The Town Dock, PO Box 608; 45 State St Narragansett, RI 02882  
PH: 401-789-2200 x128 Fax: 401-782-4421 Cell: 781-985-5635  
Email: [ncclark@towndock.com](mailto:ncclark@towndock.com)

April 3, 2019

Dear Dr. Moore,

I am writing in opposition of requalification of Illex permits.

I work in the International Purchasing department at the Town Dock and oppose the motion as we have invested heavily in our permits, research of the species, and market development. Illex squid has become a major and vital part of our product line and supply chain, both domestically and abroad.

Sincerely,

Paige McLaughlin



Dear Dr. Moore,

I'm writing to tell you that I oppose the requalification of illex permits. My company continues to grow a market for the illex product and not having the product readily available would be bad for business. We support the fishermen and their families who sell us their illex and it would be dreadful to think these fishermen would lose income if their permits were limited. I support the status quo.

Thank you,

Pamela Allsworth  
Staff Accountant  
The Town Dock  
45 State Street  
Narragansett, RI 02882

Dear Mr. Moore,

We are not in support of the requalification of the illex permits. My company was negatively affected by the requalification of longfin squid and we don't want to see any fleet further reduced by means of requalification. These frequent requalification efforts do nothing but harm the industry as a whole in order to benefit the few.

Thank you,

Tom Vinagre'  
Three Amigo's Fishing Corp.

A handwritten signature in blue ink, reading "Tom Vinagre", is written across the page. The signature is cursive and slanted upwards from left to right.



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

[www.deq.virginia.gov](http://www.deq.virginia.gov)

Matthew J. Strickler  
Secretary of Natural Resources

David K. Paylor  
Director

(804) 698-4000  
1-800-592-5482

February 25, 2019

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

RE: Scoping Request - Fisheries of the Northeastern United States; Atlantic Mackerel, Squid, and Butterfish Fisheries

Dear Ms. Moore:

This letter is in response to the scoping request for the above-referenced project.

As you may know, the Department of Environmental Quality, through its Office of Environmental Impact Review (DEQ-OEIR), is responsible for coordinating Virginia's review of federal environmental documents prepared pursuant to the National Environmental Policy Act (NEPA) and responding to appropriate federal officials on behalf of the Commonwealth. Similarly, DEQ-OEIR coordinates Virginia's review of federal consistency documents prepared pursuant to the Coastal Zone Management Act which applies to all federal activities which are reasonably likely to affect any land or water use or natural resources of Virginia's designated coastal resources management area must be consistent with the enforceable policies Virginia Coastal Zone Management (CZM) Program.

### DOCUMENT SUBMISSIONS

In order to ensure an effective coordinated review of the NEPA document and federal consistency documentation, notification of the NEPA document and federal consistency documentation should be sent directly to OEIR. We request that you submit one electronic to [eir@deq.virginia.gov](mailto:eir@deq.virginia.gov) (25 MB maximum) or make the documents available for download at a website, file transfer protocol (ftp) site or the VITA LFT file share system (Requires an "invitation" for access. An invitation request should be sent to [eir@deq.virginia.gov](mailto:eir@deq.virginia.gov).) We request that the review of these two documents be done concurrently, if possible.

The NEPA document and the federal consistency documentation (if applicable) should include U.S. Geological Survey topographic maps as part of their information. We strongly encourage you to issue shape files with the NEPA document. In addition, project details should be adequately described for the benefit of the reviewers.

## **ENVIRONMENTAL REVIEW UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT: PROJECT SCOPING AND AGENCY INVOLVEMENT**

As you may know, NEPA (PL 91-190, 1969) and its implementing regulations (Title 40, *Code of Federal Regulations*, Parts 1500-1508) requires a draft and final Environmental Impact Statement (EIS) for federal activities or undertakings that are federally licensed or federally funded which will or may give rise to significant impacts upon the human environment. An EIS carries more stringent public participation requirements than an Environmental Assessment (EA) and provides more time and detail for comments and public decision-making. The possibility that an EIS may be required for the proposed project should not be overlooked in your planning for this project. Accordingly, we refer to “NEPA document” in the remainder of this letter.

While this Office does not participate in scoping efforts beyond the advice given herein, other agencies are free to provide scoping comments concerning the preparation of the NEPA document. Accordingly, we are providing notice of your scoping request to several state agencies and those localities and Planning District Commissions, including but not limited to:

### Department of Environmental Quality:

- DEQ Regional Office\*
- Air Division\*
- Office of Wetlands and Stream Protection\*
- Office of Local Government Programs\*
- Division of Land Protection and Revitalization
- Office of Stormwater Management\*

Department of Conservation and Recreation

Department of Health\*

Department of Agriculture and Consumer Services

Department of Game and Inland Fisheries\*

Virginia Marine Resources Commission\*

Department of Historic Resources

Department of Mines, Minerals, and Energy

Department of Forestry

Department of Transportation

Note: The agencies noted with a star (\*) administer one or more of the enforceable policies of the Virginia CZM Program.

## **FEDERAL CONSISTENCY UNDER THE COASTAL ZONE MANAGEMENT ACT**

Pursuant to the federal Coastal Zone Management Act of 1972, as amended, and its implementing regulations in Title 15, *Code of Federal Regulations*, Part 930, federal activities, including permits, licenses, and federally funded projects, located in Virginia’s Coastal Management Zone or those that can have reasonably foreseeable effects on Virginia’s coastal uses or coastal resources must be conducted in a manner which is consistent, to the maximum extent practicable, with the Virginia CZM Program.

Additional information on the Virginia’s review for federal consistency documents can be found online at <http://www.deq.virginia.gov/Programs/EnvironmentalImpactReview/FederalConsistencyReviews.aspx>

## DATA BASE ASSISTANCE

Below is a list of databases that may assist you in the preparation of a NEPA document:

- DEQ Online Database: Virginia Environmental Geographic Information Systems

Information on Permitted Solid Waste Management Facilities, Impaired Waters, Petroleum Releases, Registered Petroleum Facilities, Permitted Discharge (Virginia Pollution Discharge Elimination System Permits) Facilities, Resource Conservation and Recovery Act (RCRA) Sites, Water Monitoring Stations, National Wetlands Inventory:

- [www.deq.virginia.gov/ConnectWithDEQ/VEGIS.aspx](http://www.deq.virginia.gov/ConnectWithDEQ/VEGIS.aspx)

- DEQ Virginia Coastal Geospatial and Educational Mapping System (GEMS)

Virginia's coastal resource data and maps; coastal laws and policies; facts on coastal resource values; and direct links to collaborating agencies responsible for current data:

- <http://128.172.160.131/gems2/>

- MARCO Mid-Atlantic Ocean Data Portal

The Mid-Atlantic Ocean Data Portal is a publicly available online toolkit and resource center that consolidates available data and enables users to visualize and analyze ocean resources and human use information such as fishing grounds, recreational areas, shipping lanes, habitat areas, and energy sites, among others.

<http://portal.midatlanticocean.org/visualize/#x=-73.24&y=38.93&z=7&logo=true&controls=true&basemap=Ocean&tab=data&legends=false&layers=true>

- DHR Data Sharing System.

Survey records in the DHR inventory:

- [www.dhr.virginia.gov/archives/data\\_sharing\\_sys.htm](http://www.dhr.virginia.gov/archives/data_sharing_sys.htm)

- DCR Natural Heritage Search

Produces lists of resources that occur in specific counties, watersheds or physiographic regions:

- [www.dcr.virginia.gov/natural\\_heritage/dbsearchtool.shtml](http://www.dcr.virginia.gov/natural_heritage/dbsearchtool.shtml)

- DGIF Fish and Wildlife Information Service

Information about Virginia's Wildlife resources:

- <http://vafwis.org/fwis/>

- Total Maximum Daily Loads Approved Reports

- <https://www.deq.virginia.gov/programs/water/waterqualityinformationtmdls/tmdl/tmdldevelopment/approvedtmdlreports.aspx>

- Virginia Outdoors Foundation: Identify VOF-protected land

- <http://vof.maps.arcgis.com/home/index.html>
- Environmental Protection Agency (EPA) Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) Database: Superfund Information Systems

Information on hazardous waste sites, potentially hazardous waste sites and remedial activities across the nation, including sites that are on the National Priorities List (NPL) or being considered for the NPL:

- [www.epa.gov/superfund/sites/cursites/index.htm](http://www.epa.gov/superfund/sites/cursites/index.htm)
- EPA RCRAInfo Search

Information on hazardous waste facilities:

- [www.epa.gov/enviro/facts/rcrainfo/search.html](http://www.epa.gov/enviro/facts/rcrainfo/search.html)
- EPA Envirofacts Database

EPA Environmental Information, including EPA-Regulated Facilities and Toxics Release Inventory Reports:

- [www.epa.gov/enviro/index.html](http://www.epa.gov/enviro/index.html)
- EPA NEPAassist Database

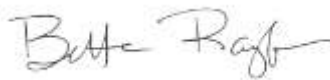
Facilitates the environmental review process and project planning:

<http://nepaassisttool.epa.gov/nepaassist/entry.aspx>

If you have questions about the environmental review process and/or the federal consistency review process, please feel free to contact me (telephone (804) 698-4204 or e-mail [bettina.rayfield@deq.virginia.gov](mailto:bettina.rayfield@deq.virginia.gov)).

I hope this information is helpful to you.

Sincerely,



Bettina Rayfield, Program Manager  
Environmental Impact Review and Long-Range Priorities

**Chuck Weimar  
F/V Rianda S  
Montauk NY  
April 1 2019**

**Dr. Christopher M. Moore  
Executive Director  
Mid-Atlantic Fishery Management Council**

Dear Dr. Moore

Thank you for the opportunity to express my opinion regarding modifications to the Illex squid permitting system.

I have been a squid fisherman for 40 years. I was fully involved in organizing and participating in the joint ventures back in the early 1980s. I already qualified for this permit.

I do not have the big landings because we participated in the fisheries most marketable. Now that the Illex fishery has developed a market, please do not eliminate me.

Please consider that we are OWNER/OPERATORS that cannot compete with big foreign companies looking to have the fishery. Maybe consider joint ventures again??

Requalification takes away our option of participating in the Illex fishery in the future. I have permits for most fisheries along the east coast and need the flexibility depending on quotas and resource availability to stay competitive. I would not have lasted as a commercial fisherman for 50 years with all my fish in one basket. Please consider this when making your decisions.

Thank you.

Sincerely

A handwritten signature in cursive script that reads "Chuck Weimar".

Chuck Weimar





April 10, 2019

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

**RE: *Illex* Permits and FMP Goals Amendment Scoping Comments**

Dear Dr. Moore,

Founded in 1973 by conservation-minded anglers, *Wild Oceans* is committed to advancing ecosystem-based fishery management approaches that reflect our expanding circle of concern for all marine life and the future of fishing. We appreciate the opportunity to provide the following recommendations for developing a new amendment to the Atlantic Mackerel, Squid and Butterfish Fishery Management Plan (MSB FMP).

**1) Update the MSB FMP Goals and Objectives to accurately reflect the Council’s Vision, Strategic Plan and Ecosystem Approach to Fisheries Management Guidance Document priorities.**

The existing MSB FMP goals and objectives, established in 1983, are antiquated and do not reflect the Mid-Atlantic Fishery Management Council’s vision of “healthy and productive marine ecosystems supporting thriving, sustainable marine fisheries that provide the greatest overall benefit to stakeholders.” Ensuring that FMP goals and objectives are up-to-date and relevant is important because they provide the context within which the Secretary of Commerce judges the consistency of an FMP’s conservation and management measures with the National Standards.<sup>1</sup>

Arguably, the current suite of MSB objectives is “single species” in nature and is not in accord with the objectives, strategies and policies for broadening ecosystem considerations that were adopted during the Council’s Visioning and Strategic Planning process and the subsequent completion of the *Ecosystem Approach to Fisheries Management Guidance Document*. We ask the Council to include alternatives for FMP goals and objectives that recognize the importance of accounting for ecological considerations in the specification of

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<sup>1</sup> 50 CFR § 600.305 (b) (3)

Optimum Yield as required by the Magnuson-Stevens Fishery Conservation and Management Act (MSA).<sup>2</sup> Other federal FMPs for forage species provide useful examples:

- The New England Council’s Atlantic Herring FMP contains an objective to “provide for long-term, efficient, and full utilization of the optimum yield from the herring fishery while minimizing waste from discards in the fishery. Optimum yield is the amount of fish that will provide the greatest overall benefit to the Nation, particularly with respect to food production and recreational opportunities, taking into account the protection of marine ecosystems, including maintenance of a biomass that supports the ocean ecosystem, predator consumption of herring, and biologically sustainable human harvest. This includes recognition of the importance of Atlantic herring as one of many forage species of fish, marine mammals, and birds in the Northeast Region.”
- The Coastal Pelagic Species FMP, developed by the Pacific Fishery Management Council, manages a number of species that are important to the California Current forage base. “Provide adequate forage for dependent species” is one of the objectives featured in the FMP.

The Council should also consider the goals and objectives approved as part of the recently completed Chub Mackerel Amendment as a model for revised MSB FMP goals and objectives. The Chub Mackerel Amendment goals and objectives are comprehensive and appropriate for not only chub mackerel, but for all the managed species within the FMP because of their shared role in the ecosystem as prey for piscivorous fish, seabirds and marine mammals. Objective 1.1 (prevent overfishing and achieve and maintain sustainable biomass levels that achieve optimum yield in the fisheries and meet the needs of... predators) warrants consideration as the primary plan objective and would serve well as an overarching objective for the FMP’s management measures.

While we strongly support a single set of FMP goals and objectives to function as the framework for the management of all the species in the FMP, the Chub Mackerel Amendment goals and objectives, which were developed through extensive stakeholder and Council input, must remain applicable to chub mackerel and should not be weakened or superseded through this action.

## **2) Include an alternative to require daily VMS reporting for *Illex* permit holders.**

Vessels with *Illex* permits are currently required to carry Vessel Monitoring Systems (VMS); however, they are not required to utilize this system for timely reporting. In recent years (2017 & 2018), the *Illex* fishery has closed early because the quota has been reached. A daily, electronic reporting system improves the accuracy and timeliness of catch reporting, reduces uncertainty in quota tracking, and helps ensure that the quota is fully harvested without exceeding the limit.

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<sup>2</sup> 50 CFR § 600.310(e)(3)(iii)

Limited access mackerel permit holders and longfin squid/butterfish moratorium permit holders are already required to report their catch daily through VMS. Given the likelihood that *Illex* permit holders also carry either limited access mackerel or longfin squid/ butterfish moratorium permits, it would be reasonable to extend the daily VMS reporting requirement to vessels engaged in *Illex* fishing.

**3) Clarify that the ABC control rules and risk policy developed through the ACL/AM Omnibus Amendment are applicable to longfin (*Doryteuthis*) and shortfin (*Illex*) squid, and require use of these control rules when developing squid specifications.**

Annual species like squids may be exempt from annual catch limit (ACL) and accountability measure (AM) requirements, but they are not exempt from needing an SSC-recommended ABC that is determined through a control rule and Council risk policy.<sup>3</sup> While the Council's current specifications process for squids properly recognizes and incorporates the role of the SSC in recommending ABCs, this practice is not accurately reflected in the regulations because annual species were eliminated from the scope of the Council's 2011 ACL/AM Omnibus Amendment and its implementing regulations.

According to current regulations (50 CFR § 648.22), the Monitoring Committee continues to have primary responsibility for initial squid ABC recommendations. In addition, the shortfin and longfin squid control rules described in existing regulations are not functional according to the most recent stock assessments for these species. For *Illex*, the control rule for MAX OY is the catch associated with fishing mortality rate of  $F_{MSY}$ , but fishing mortality cannot be determined.<sup>4</sup> Likewise, for longfin squid, MAX OY is the catch associated with a fishing mortality rate of  $F_{Threshold}$ , yet the 2010 assessment concluded that "the current F reference point approach is inappropriate."<sup>5</sup>

The regulations under *Illex* and longfin squid specifications should be revised, in accordance with the regulations for all other Mid-Atlantic Council-managed species, to explicitly state that "the MAFMC's SSC shall recommend an ABC to the MAFMC, as described in § 648.20." This new amendment action provides an opportunity to correct the regulations to accurately reflect current law and Council procedures.

Thank you for taking our comments into consideration. *Wild Oceans* supports advancing this amendment and looks forward to our continued work with the Mid-Atlantic Council.

Sincerely,



Pam Lyons Gromen, Executive Director

<sup>3</sup> 50 CFR § 600.310(h)(2)(i); "While exempt from the ACL and AM requirements, FMPs or FMP amendments for these stocks must have SDC, MSY, OY, ABC, and an ABC control rule."

<sup>4</sup> Northeast Fisheries Science Center. 2006 42nd Northeast Regional Stock Assessment Workshop (42nd SAW) stock assessment report, part A: silver hake, Atlantic mackerel, and northern shortfin squid. Northeast Fish Sci Cent Ref Doc. 06-09a, 284p.

<sup>5</sup> Northeast Fisheries Science Center. 2011. 51st Northeast Regional Stock Assessment Workshop (51st SAW) Assessment Report. US Dept Commer, Northeast Fish Sci Cent Ref Doc. 11-01; 70 p.