



New England Fishery Management Council

50 WATER STREET | NEWBURYPORT, MASSACHUSETTS 01950 | PHONE 978 465 0492 | FAX 978 465 3116
E.F. "Terry" Stockwell III, *Chairman* | Thomas A. Nies, *Executive Director*

April, 28, 2015

Mr. Samuel D. Rauch, III
National Marine Fisheries Service
National Oceanic and Atmospheric Administration
1315 East-West Highway
Silver Spring, MD 20910

Dear Mr. Rauch:

Thank you for the opportunity to comment on the Draft National Bycatch Reduction Strategy. This strategy is intended to guide and coordinate efforts to reduce bycatch and bycatch mortality. The six overall objectives, and the specific strategies underlying each, are straight-forward and easily understood. We have one comment on these elements, but first wish to raise a broader issue.

The Council is concerned that there does not appear to be any high-level direction on the relative importance of different types of bycatch. The strategy will lead to the development of national and regional action plans to further reduce bycatch. Given the current budget and management climate, it is unlikely that there will be sufficient time or resources to address all bycatch issues at the same time. Regional action plans will need to face these limitations. The strategy should provide guidance on how to rank the relative importance of bycatch so that regional plans are consistent with national priorities. As an example, from a national perspective reducing bycatch of endangered or threatened species might deserve more immediate attention than reducing bycatch of a commercially important, overfished stock – even though a region may reach a different conclusion. As drafted, the strategy is silent on these tradeoffs.

The Council believes that further development of this issue is warranted. The goal would be to identify national priorities while leaving flexibility for regional approaches to the issue. We request that as the strategy moves forward, the Regional Fishery Management Councils be consulted on establishing bycatch priorities, as well as the best methods for achieving the objectives of the strategy. Perhaps some of these questions will be addressed in a national bycatch strategy implementation plan.

One of the objectives in the strategy is to strengthen monitoring and data collection programs. While we support this objective, it is not clear that the agency's budget will support these initiatives. In the Greater Atlantic Region, there is routinely a shortfall of at least \$1.5 million just to meet Standardized Bycatch Reporting Methodology observer coverage levels. While new technology, such as electronic monitoring and reporting, may help reduce this gap, these initiatives will need their own funding streams.

Please consider our comments as you prepare the final strategy. Please contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Thomas A. Nies".

Thomas A. Nies
Executive Director

cc: Regional Fishery Management Councils
Mr. John Bullard
Dr. William Karp