

Queen Conch and Spiny Lobster

I would like to begin by making my position clear: I support keeping the management of queen conch and spiny lobster under the jurisdiction of the Government of Puerto Rico.

In the case of queen conch, the reality is quite straightforward: practically 100% of the harvest occurs in state waters, since harvesting queen conch is prohibited in federal waters. Therefore, I believe its management should reflect the reality of the waters where the fishery actually takes place.

Regarding spiny lobster, the situation is somewhat more complex. Only a small portion of the reported harvest comes from federal waters. However, there is an important limitation in the information we receive. The *trip report* identifies the area where the largest quantity of the reported species was harvested, but it does not necessarily allow us to determine precisely where each individual catch occurred.

This creates a level of uncertainty that we should take into consideration when using these data to make management decisions.

For a long time, this Council has discussed these two species. Studies have been conducted, data have been collected, and management plans have been developed, including studies conducted in state waters.

However, whenever it has been necessary to implement *accountability measures* in federal waters, to the best I remember, the Government of Puerto Rico has not agreed to make those measures compatible with the management measures in place in our state waters.

And I would like to take this a step further.

We all know the reality of these two fisheries.

Both queen conch and spiny lobster are currently so abundant that, in many cases, the problem is not a lack of product, but rather a lack of demand.

Prices have declined considerably, and some fish markets have been forced to limit their purchases from fishermen to only two or three days per week and to specific quantities because, quite simply, supply is exceeding demand.

That is also part of fisheries management.

We cannot look only at the biological indicators of a fishery and ignore the economic reality of fishermen and the local market.

Puerto Rico is an aging society. In addition, a significant portion of our young population and workforce has had to migrate to the United States in search of better economic opportunities and a better quality of life.

At the same time, per capita income in Puerto Rico remains low compared with the high cost of living we face.

This has a direct impact on the consumption of seafood products.

Several years ago, a family could go out to eat on a weekend and purchase a three-and-a-half-pound lobster without it representing an extraordinary expense. Today, many families have difficulty doing so. If they are fortunate, they may go out to eat once a month, and if their budget allows, they may share a one-and-a-half-pound lobster or look for alternatives such as empanadillas, which are not as inexpensive as they used to be either.

Meanwhile, restaurants are also facing increases in electricity, inventory, payroll, and virtually every other cost associated with maintaining their operations.

That is why I believe fisheries management must take into consideration not only the biology of the resource, but also **the economic realities of the fishermen, the consumer, and the entire seafood supply chain.**

And I do not want to open a Pandora's box, but there is another issue that we cannot ignore.

Even though these two fisheries are in healthy condition, our local fishing industry faces unfair and relentless competition from imported seafood products.

So we have to ask ourselves: **What are we actually trying to solve?**

If we have abundant local resources, fishermen who need a market, consumers who are dealing with a high cost of living, and a local fishing industry competing with imported products, we need to make sure that our management decisions are based on the reality of Puerto Rico.

I also believe we need to evaluate how we use our financial resources.

Instead of continuing to invest large amounts of money in repetitive studies of species that we already know are abundant and healthy, some of those resources could be used to strengthen *enforcement* in our state waters.

And here we have a concrete example.

Despite having limited resources, in less than one year, local authorities have successfully intercepted **two substantial shipments of undersized lobster coming from the southwestern part of Puerto Rico.**

That demonstrates that when resources are available to enforce the regulations, results can be achieved.

Therefore, my position is simple:

We should trust the Government of Puerto Rico's ability to manage these fisheries in its state waters, and we should direct our resources toward areas where they can actually make a difference.

Fisheries management cannot simply become an endless accumulation of studies and regulations.

We have to look at the biological data, yes, but we also have to look at the fisherman, the consumer, the market, and the economic reality of Puerto Rico.

If the resource is abundant, if the fishery is healthy, and if the problem we are facing is an excess of supply, then we need to ask ourselves whether the measures we are considering actually address the problem or whether, instead, they end up harming the people who depend on this fishery.

I believe Puerto Rico should have the ability to manage these species according to its own reality, and that our efforts and resources should be directed where they are most needed: **enforcement of regulations, protection of the resource, and strengthening our local fishing industry.**

Respectfully,

Nelson Crespo

Puerto Rico District Advisory Panel Chairman