



July 23, 2025

Caribbean Fishery Management Council – Ad Hoc Committee

270 Muñoz Rivera Avenue, Suite 401

San Juan, Puerto Rico 00918

Subject: Request for Consideration of Revisions to the Commercial Catch Report and Related Management Measures

Dear Members of the Ad Hoc Committee,

On behalf of the St. Thomas Fishermen's Association (STFA), we would like to express our appreciation for the opportunity to provide input on fishery management practices that affect our community and livelihoods. We respectfully submit the following requests for your consideration and action:

1. Creation of a Commercial Catch Report (CCR) Specific to the Trap Fishery

Approximately 90–95% of the catch reported in the current CCR is derived from trap catch landings. We request the development of a CCR specific to the trap fishery, which would significantly improve the accuracy of data and allow for better-informed management decisions.

2. Revision of the Existing CCR Species List

We propose the removal of the following species from the current CCR due to their rare occurrence in catch and the high potential for species misidentification:

- Rock Hind, Tiger, Yellowmouth, and Yellowedge Grouper
- Gray and Tomtate Grunt
- Gray (Mangrove) Snapper
- Jolthead and Sheepshead Porgy
- Ocean Surgeon
- Sea Cucumbers
- Sea Urchins
- Queen, Redband, and Redfin Parrotfish
- Bar Jack and Bigeye Scad
- Caribbean Reef, Great Hammerhead, Nurse, and Scalloped Hammerhead Sharks
- Flying Fish
- Filefish
- Turtle Interactions
- Pelagics

3. **Removal of Seasonal Closures**

The Annual Catch Limits (ACLs) for managed species were established using landings data from years when seasonal closures had not yet been implemented and reflected full-year fishing activity without restrictions. Since these species are now effectively managed through catch limits, we believe that the continued enforcement of seasonal closures results is redundant. Removing these closures would allow for greater operational flexibility while maintaining sustainable harvest levels. We are confident that the existing catch limit framework provides sufficient safeguards to ensure long-term resource sustainability.

4. **Opposition to Additional Area Closures**

The St. Thomas/St. John fishery is already significantly restricted by existing closures, including:

- The Marine Conservation District (14 square miles)
- The Coral Reef Monument (12,708 acres)
- National Park Service Territory (marine)
- The St. Thomas East End Reserve (3.7 square miles)
- The Grammanik Bank

Further closures would place an unsustainable burden on our local fishing community. We request that no additional area closures be considered and that current closures be reviewed for possible revision.

5. **Removal of Dolphin and Wahoo from the Managed Species List**

Both dolphin and wahoo are highly migratory species (HMS) and should be managed accordingly, like tuna. Including them on the local managed species list creates inconsistencies in regulatory oversight and adds unnecessary management complications.

We recognize the importance of improving data collection and support updates to certain regulations that will enhance monitoring and long-term resource management. Area closures already in place continue to serve as an effective conservation measure, helping to ensure the health of the stock for generations to come.

Thank you for considering these updates, which we believe will strengthen both the effectiveness and fairness of fisheries management. We thank the Council for the continued engagement and willingness to hear stakeholder concerns. We look forward to continued dialogue and collaboration to ensure a sustainable and economically viable fishery for all.

Sincerely,

Julian Magras,
Chairman
St. Thomas Fishermen's Association (STFA)