



Beyond Our Shores Foundation  
Dolphinfish Research Program

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Caribbean Fishery Management Council  
San Juan, Puerto Rico

Dear Mr. Miguel Rolon and Council Members:

As you move toward your upcoming council meeting that includes further consideration of amendments to your Island-Based Fisheries Management Plans, and in particular the management of dolphin within Amendment 3 for the St. Croix, St. Thomas and St. John Fishery Management Plans, we would like to offer some perspective on dolphin management within the Western Central Atlantic Ocean (WCA). As you are aware and as evidenced by the composition of the proposed amendment, the dolphin stock in the WCA appears to be declining and needs significant and timely strengthening of management actions. The following are several examples of supporting information.

The recent addition of 2022 U.S. landings data extended the downward trend that has been in place for the past 30 years (Figure 1). Figure 1 depicts U.S. east coast dolphin landings since 1989 based on the National Marine Fisheries Service Marine Recreational Information Program and Commercial Fisheries Statistics. Unfortunately, changes to U.S. Atlantic management in response to strong evidence of the decline in the stock and the need for an immediate strengthening of conservation efforts has been slow and lack the strength to have any meaningful impact. For example, the recently finalized Amendment 10 of the South Atlantic Fisheries Management Council's (SAFMC) Dolphin Wahoo Fisheries Management Plan took five years to complete and did not contain meaningful management improvement with only a 60 to 54 vessel limit reduction and no change to the bag limit or minimum length.

As Amendment 10 was being completed some SAFMC members realized it did not sufficiently address needed management strengthening and, therefore, a new amendment, Regulatory Amendment 3 (RA3) to the Dolphin Wahoo Fisheries Management Plan, was started in June 2021. At the June 2022 SAFMC meeting the potentially beneficial concept of Management Strategy Evaluation (MSE) was introduced as a methodology for developing management actions for the dolphin fishery. MSE is emerging as an approach to identify the most effective measures for managing a resource, dolphin being a prime example, that has numerous factors impacting it and, likewise, numerous options for minimizing negative impacts and/or preventing decline. As a part of the MSE presentation an optimistic timeline for a dolphin MSE project was included. During discussion it was recognized that Council staff resources were not sufficient to move forward in the near-term with both an MSE project and RA3. The MSE project was identified as the priority for the Council's workplan at that time with a return to work on RA3 planned for the December 2022 Council meeting.



Several items of significance have occurred over the past nine months. The progress made on the MSE is well behind the original projection, work on RA3 has continued to be pushed back with the appearance that it will be delayed until after initial results from the MSE are available, and preliminary full-year 2022 dolphin landings data became available. Some delay in the MSE project is not surprising given the optimistic nature of the original projection, however, the reality is that the project, although very worthwhile, is complex and will take a significant amount of time to complete, possibly several years.

When progress to date with the MSE project is coupled with the amount of remaining work required to provide meaningful management guidance and that then is combined with the potential for a continuation of the landings trend there is the risk that the dolphin stock could be at a level that will make it more difficult to halt the downward trend and begin a move in the positive direction. At its current pace and level of complexity the MSE project could take 2-3 years to complete. An amendment will then be needed to implement the MSE. History says the time from amendment start to implementation is 2-3 years at best. So, without a shorter timeline it will be 4-6 years until stronger management measures that appear to be needed now are in place for the U.S. Atlantic.

The MSE project is very much worthwhile as it holds the potential for improved management of dolphin in the future for the entire WCA. Therefore, we encourage CFMC to consider seeking participation. However, that participation should not be at the expense of the much-needed current amendment that is underway with respect to Amendment 3. We strongly encourage you to move forward promptly with a meaningful strengthening of dolphin management and conservation in the St. Croix, St. Thomas, and St. John areas of jurisdiction through the current amendment by implementing actions 2 for size limits. This management change would mirror the minimum size that has been in place for Florida Atlantic waters through to South Carolina since 2012.

In order for anglers to benefit from the early age of maturation, high reproductive capacity, fast growth, and return migration tendency for dolphinfish within the WCA it is necessary at this time to implement a size limit and expand the current South Atlantic Bight 20" fork-length minimum size for waters within the U.S. Caribbean Sea, first in St. Croix, St. Thomas, and St. John waters. Published scientific literature estimates mature female dolphin (6-11 pounds or 27"-34" fork-length) can produce 100,000 to 200,000 eggs every other day. Growth data obtained through tagging estimate on average fish can grow a half an inch per week or just over two inches per month. While likely an underestimate, the tagging growth data suggest that a 16" or 18" dolphin, generally the smallest fish caught by recreational anglers, would grow for an additional 1-2 months before being legal size to be harvested. That would translate into a growing female to release millions of more eggs before being put in a fish cooler. Given the size of the U.S. Caribbean Sea recreational fishery and the growth of the recreational harvest of dolphin over the past several years, please implement actions 2 with respect to sizes limits for dolphin to give fish less than 20" the chance to reproduce more as well as return to the U.S. Caribbean Sea as larger fish in the future.

Best Regards,

A handwritten signature in black ink, appearing to read 'Wessley Merten'.

Wessley Merten, Ph.D.

Director - Beyond Our Shores Foundation Dolphinfish Research Program

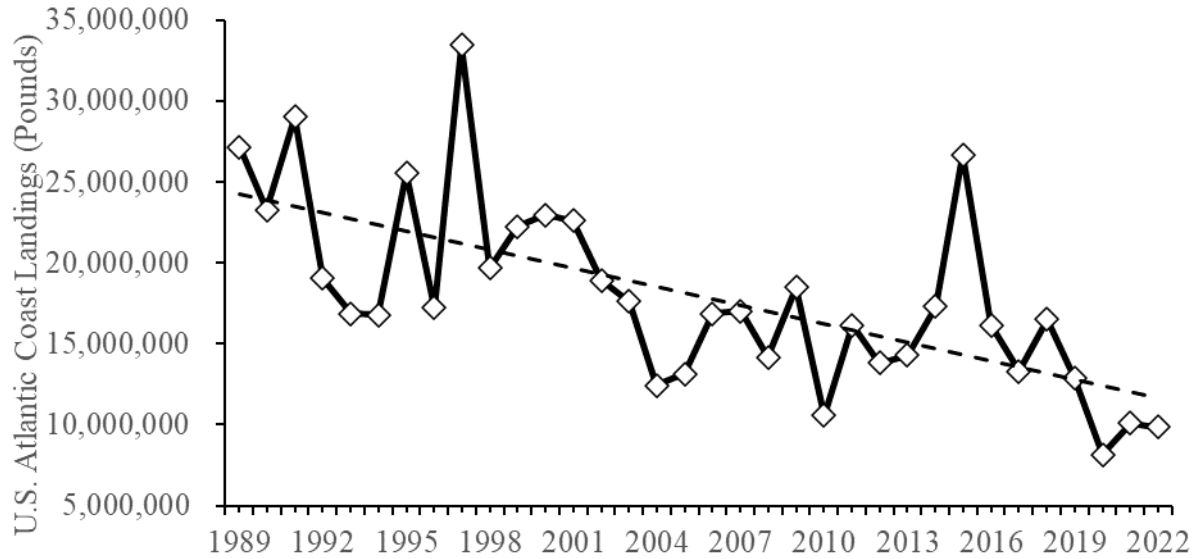


Figure 1 Annual U.S. Atlantic (recreational and commercial) dolphinfish landings from 1989 to 2022. Recreational landings were obtained from this [link](#). Commercial landings were obtained [here](#). U.S. commercial landings for 2022 have not been published by NMFS yet. Therefore, the 2022 value represents only the U.S. Atlantic recreational fleet. Monroe County is included in the data.