



St. Thomas Fishermen's Association

Protecting our Natural Heritage and Culture

June 25, 2014

Good evening, CFMC staff and members and Virgin Islands fishermen.

My name is David Olsen, Chief Scientist for the St. Thomas Fishermen's Association, twice Director of the Virgin Islands Division of Fish and Wildlife and author of 32 reports and publications on Virgin Islands fisheries.

We are here tonight for input on the Council's plan to provide flexibility in determining when to impose "Accountability Measures" when landings exceed Allowable Catch Limits.

I have worked with Dr. Quigly and totally support the method which she has developed as a substitute to the arbitrary and capricious determination by NOAA General Council to "Start at December 31 and count backwards to the number of days necessary to compensate for the overrun."

There never was a clearer declaration that NOAA and NMFS have no concern for our fishermen and their families. Clearly as long as the General Council's kid gets a Christmas present, he has no concern about whether the children of the Virgin Islands fishermen ever see Santa Claus.

This also approach could also lead to multiple accountability measures being required during the same period, maximizing the negative social and economic impacts on fishermen and their families during the Christmas season.

Incorporation of even a minimum amount of information could have shortened the number of days if it had taken place in July through October when grouper landings are higher than in December. They could have learned this (if interested) from landings data at the SEFSC.

Now, I want to ask what the Hell does the Council think it is doing anyways?

These closures only affect Federal waters. Any fisherman with the affected species can just say he caught them in Territorial waters. In this same light

since they only affect Federal waters, the closures are inherently not going to achieve the required reductions. You do not know landings in Federal Waters versus Territorial waters and it would be the easiest thing in the world for fishermen to simply not acknowledge the fishing areas accurately.

You cannot expect to use accountability measures when there is no compatibility with Territorial waters. You are playing at management rather than actually doing it.

Once again, this whole ACL approach to fisheries management, coupled with CFMC/NMFS inflexibility is creating a disincentive for fishermen to accurately report their landings.

I don't know what the solution is, but this certainly isn't it. You have had the last ten years to find some approach to working with fishermen instead of against them and you have wasted that opportunity.

For the past decade, the STFA paid with their own money and lost time for members to attend meetings. They involved members in advisory committees and special issue committees and attended SEDAR meetings.

Despite this, I don't believe our fishermen feel that they have had any significant impact when compared to the time and effort they have expended..

Thank you;

A handwritten signature in black ink, appearing to read 'David A. Olsen', with a large, stylized flourish at the end.

David A. Olsen, Ph.D.
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Cc: Hon. Donna Christensen, Delegate to Congress
Hon. Penny Pritzker, Secretary of Commerce
Miguel Rolon, Executive Director CFMC