



December 11, 2015

Mr. Carlos Farchette, Chair
Caribbean Fishery Management Council
270 Muñoz Rivera Ave., Suite 401
San Juan, Puerto Rico 00918

Re: Recommendations for the Development of Island Based Fishery Management Plans

Dear Chairman Farchette,

One of the most important decisions the Council must make in the transition from species-based to island-based fishery management plans (IBFMP) is the determination of which species require conservation and management, and the organization of those species into fishery management units (FMUs). After receiving the recommendations of an Expert Panel and the District Advisory Panels (DAPs) earlier this year, the Council has proposed a preliminary list of species for each IBFMP that would include all corals, which play vital roles in maintaining the structure and health of the reef ecosystem, and many vulnerable reef fish that have been historically important to the fishery.

While these lists are generally consistent with the Expert Panel's recommendations, Pew remains concerned that the data available to support these decisions remains quite limited, and other critical ecosystem considerations are not addressed through this process. Thus, we offer the following recommendations for the Council's consideration:

1. Begin deliberations to specify goals and objectives that outline the intended outcomes of each IBFMP and provide a framework of priorities to guide future management actions, including objectives that address the protection of the coral reef ecosystem.
2. Specify in each IBFMP a process for periodic review of fishery data and other scientific information to ensure that the most recent and best available science is used to ensure inclusion of all species requiring conservation and management.
3. Set conservative annual catch limits (ACLs) to account for the inherent uncertainties and risks of overfishing associated with data-limited stock complexes.
4. Develop a subsequent Fishery Ecosystem Plan (FEP) that will focus on ecosystem concerns not addressed in the development of IBFMPs, such as a strategic habitat protection plan, as well as accounting for the role of forage species as prey and the impacts of climate change on fish and their coral reef habitat.

The basis for these recommendations is briefly discussed below.

- 1. Begin deliberations to specify goals and objectives that outline the intended outcomes of each IBFMP and provide a framework of priorities to guide future management actions, including objectives that address the protection of the coral reef ecosystem.**

The protection of marine ecosystems on which the fisheries depend is a core goal of conservation and management under the Magnuson-Stevens Fishery Conservation and Management Act and it is an important consideration when specifying Optimum Yield (OY).¹ We highly recommend that one goal should be to manage the fisheries within the limits of local ecosystem production so as not to jeopardize a wide range of goods and services provided by a healthy ecosystem, including food, revenue, and recreation for humans.² We urge the Council to begin this discussion now and to seek the advice of its Science and Statistical Committee (SSC) and input from the public so that IBFMP goals and objectives reflect the broad public interest in the stewardship of these public resources. With so much at stake, a clear idea of where the Council is headed, and what outcomes stakeholders can expect, are critical in this momentous management transition.

2. Specify in each IBFMP a process for periodic review of fishery data and other scientific information to ensure that the most recent and best available science is used to ensure inclusion of all species requiring conservation and management.

The Council's currently proposed list of species for each IBFMP would greatly reduce the number of managed species, and fails to include the DAPs' recommendation of using the Ecosystem Component (EC) species classification for monitoring many species whose susceptibility and importance to the fishery is uncertain due to the limitations of species-specific catch data.³ The large uncertainties in reported fisheries data underscore the need to establish and maintain effective monitoring and reporting programs that support management objectives and can facilitate updates to the list of managed species and FMUs in each IBFMP as more information becomes available. This process should occur at least once every five years.

3. Set conservative ACLs to account for the inherent uncertainties and risks of overfishing associated with data-limited stock complexes.

The existing National Standard 1 guidelines allow for grouping of species into complexes.⁴ In March 2015, the SSC recommended organizing FMUs into stock complexes where possible. Many existing management units (e.g., Snapper Units 1-4, Grouper Units 1-5, Parrotfish, etc.) could be carried over into the IBFMPs, although new FMUs will be required for previously unmanaged species such as dolphin and wahoo. However, the use of stock complexes incurs significant risks of overfishing weaker species in a complex, particularly if ACLs and other required reference points are based on indicator stocks that are more resilient to fishing pressure than others in the complex.⁵ Whether or not indicator species are used, establishing conservative ACLs is a way to mitigate the risk of overfishing vulnerable species.

4. Develop a subsequent FEP that will address ecosystem concerns not addressed in the development of IBFMPs.

The transition to IBFMPs coincides with a national initiative by NOAA Fisheries to develop an agency-wide Ecosystem-Based Fishery Management (EBFM) policy.⁶ As proposed by the agency, an FEP could function as an umbrella strategic planning document.⁷ The recommendation for FEPs is not new: the Report to Congress by NOAA Fisheries' Ecosystem Principles Advisory Panel in 1999 recommended the development of FEPs for

¹ 16 U.S.C. §§ 1802(5), 1802(33).

² National Research Council (1999), *Sustaining Marine Fisheries*, Washington, DC: National Academy Press, 164 pp. For definition of "healthy ecosystem," see 50 CFR § 600.815(a): an ecosystem in which productive capacity and habitat is maintained, diversity of the flora and fauna is preserved, and the system retains the ability to regulate itself. Such an ecosystem should be similar to undisturbed ecosystems with regard to productivity, nutrient dynamics, trophic structure, species richness, stability, resilience, contamination levels, and the frequency of diseased organisms.

³ See National Standard 1 guidelines at 50 CFR § 600.310(d)(5) for current guidance on the use of EC species classification. NMFS is currently in rulemaking to revise the NS1 guidelines.

⁴ 50 CFR § 600.301(d)(8). However, species that are grouped into stock complexes should be similar in geographic distribution, life history, and vulnerabilities.

⁵ 50 CFR § 600.310(d)(9).

⁶ See <http://www.st.nmfs.noaa.gov/ecosystems/ebfm/creating-an-ebfm-management-policy>.

⁷ See http://www.st.nmfs.noaa.gov/Assets/ecosystems/ebfm/Draft_EBFM_Policy_9.9.2015_for_release.pdf.

ecosystems under the jurisdiction of the Councils, which were envisioned as *a mechanism for incorporating ecosystem policy goals into the present regulatory structure under FMPs*.⁸ The Southeast Regional Office of NOAA Fisheries has indicated its intent to address many overarching ecosystem concerns separately through a future FEP rather than the IBFMP process, but no timeline has been formalized. Therefore, we urge the Council to formally initiate a process for developing a Caribbean FEP that will address cross-cutting ecosystem concerns not addressed during the development of IBFMPs – such as development of a strategic habitat plan, and accounting for the role of forage species as prey and the impacts of climate change.

We appreciate the Council’s deliberative steps to develop IBFMPs and look forward to working with you to ensure a healthy marine ecosystem that can support jobs, recreation, and provide food for generations to come.

Sincerely,

A handwritten signature in blue ink that reads "Yasmin Vélez-Sánchez". The signature is fluid and cursive, with the first name being the most prominent.

Yasmin Vélez-Sánchez
Manager, U.S. Oceans, Caribbean
The Pew Charitable Trusts

⁸ NMFS (1999), Ecosystem-Based Fishery Management: A Report to Congress of the Ecosystem Principles Advisory Panel, p. 2.