



Southern Shrimp Alliance

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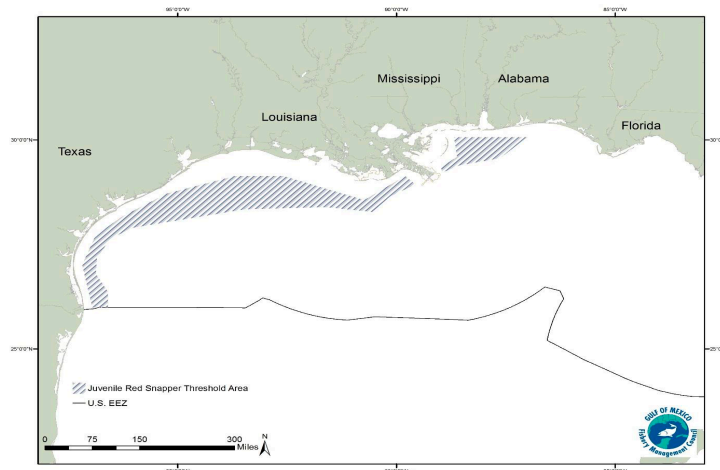
Dr. Tom Frazer, Chairman
Gulf of Mexico Fishery Management Council
2203 North Lois Ave, Suite 1100
Tampa, FL 33607

Dear Chairman Frazer:

The Southern Shrimp Alliance (SSA) appreciates the opportunity to provide comments on Amendment 18 to the Fishery Management Plan for the Shrimp Fishery of the Gulf of Mexico, U.S. Waters.

As the Council will recall, SSA participated extensively on behalf of the shrimp fishery in the development of the initial red snapper rebuilding plan set forth in joint Reef Fish Amendment 27 and Shrimp Amendment 14. (Amendment 27/14). Through this joint Amendment each sector of the directed red snapper fishery and the shrimp fishery were held accountable for reducing fishing mortality to a level that would achieve the rebuilding plan objectives.

For the shrimp fishery, Amendment 27/14 required shrimp trawl effort in the 10-30 fathom zone in shrimp statistical areas 10-21 (described as the primary juvenile red snapper habitat), to be reduced by 74% from the 2001-2003 shrimp trawl effort baseline. There follows a graphic depicting this habitat area to which the target effort reduction applies.



The Amendment further specified that this effort reduction threshold would be reduced to 67% in 2011 (which it was), and further phased down to 60% by the end of the rebuilding period (2032).

There follows the specific text of Action 6/Preferred Alternative 6 of Amendment 27/14:

“Establish a target reduction of red snapper shrimp trawl bycatch mortality on red snapper 74 percent less than the benchmark years of 2001-2003 for the years 2008 through 2010. Reduce the target goal to 67 percent beginning in 2011, and thereafter reduce the target goal, as necessary, to achieve a target reduction goal of 60 percent by 2032.”

The underlying premise of this strategy was consistency with the statutory mandate set forth in Magnuson-Stevens Act (MSA) section 303(a)(14), which requires the fair and equitable sharing of the benefits of rebuilding a stock among each of the affected fisheries.

There follows the specific text of MSA section 303(a)(14)

“SEC. 303. CONTENTS OF FISHERY MANAGEMENT PLANS (16 U.S.C. 1853)

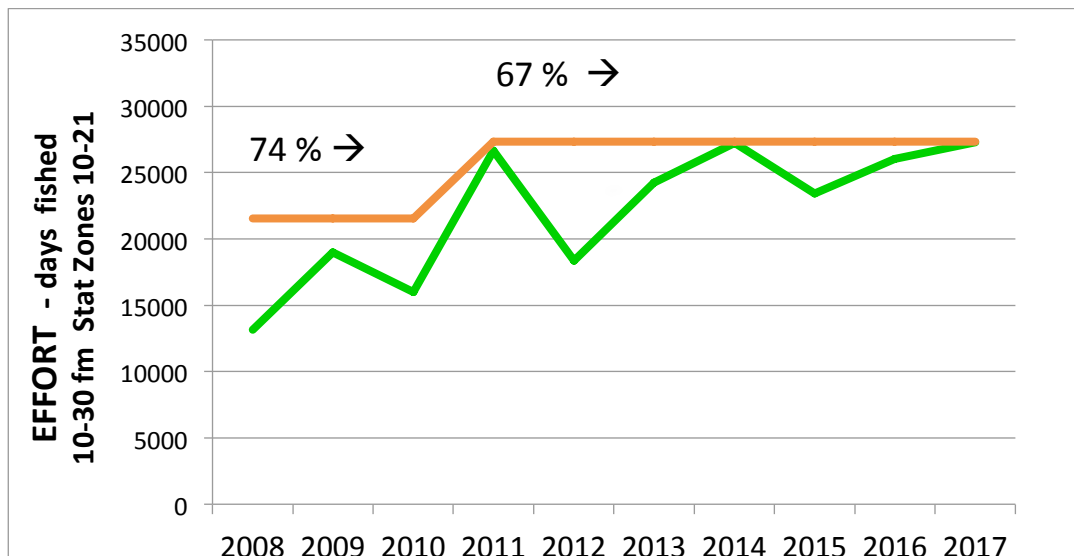
(a) REQUIRED PROVISIONS.

-- Any fishery management plan which is prepared by any Council, or by the Secretary, with respect to any fishery, shall –

(14) to the extent that rebuilding plans or other conservation and management measures which reduce the overall harvest in a fishery are necessary, allocate, taking into consideration the economic impact of the harvest restrictions or recovery benefits on the fishery participants in each sector, any harvest restrictions or recovery benefits fairly and equitably among the commercial, recreational, and charter fishing sectors in the fishery and;”

Since Amendment 27/14 was implemented in 2008, the Gulf shrimp fishery has achieved 100% compliance with the effort reduction threshold. There follows a graphic illustration of the shrimp fishery’s compliance with the required effort reductions translated into effort caps.

The original 74% reduction translated to a fishing effort cap in the 10-30 fathom depth areas within Statistical Zones 10-21 of 21,531 days fished. The subsequent threshold of 67% implemented in 2011 translated to a fishing effort cap of 27,328 days fished.



Data Source: Rick Hart, SEFSC, NMFS, pers. comm.

Through these fishing effort and associated juvenile bycatch mortality reductions in the juvenile red snapper habitat area, the shrimp fishery has made a substantial contribution to reducing total fishing mortality and to the continuing rebuilding of the red snapper stock to the level that it is no longer considered overfished and is no longer subject to overfishing.

During this rebuilding period, quotas and associated economic benefits for all commercial and recreational directed red snapper fisheries have increased substantially. Therefore, consistent with the section 303(a)(14) Magnuson-Stevens Act mandate, the Council is now considering a measure to further relax the shrimp effort threshold through Shrimp Amendment 18.

Amendment 18: Action 1

At its April 2018 meeting, the Council sent a letter to the Southeast Fisheries Science Center (SEFSC) requesting an analysis of relaxing the red snapper effort target reduction goal by 1% increments, from 67% to 60%. In July 2018, the SEFSC responded to this request with an analysis of 63%, 60%, 56%, 40% and 0% reductions from the 2001-2003 effort baseline (*see Goethel/Smith, 2018*). In their response, the SEFSC included the following conclusions:

- *“Results indicate that increasing shrimp effort (or shrimp days) by the amounts proposed in the GMFMC memo would be unlikely to substantially impact ABCs for Gulf of Mexico red snapper.”*
- *“Overall, moderate changes in shrimp bycatch levels are unlikely to alter rebuilding schedules or ABCs.”*
- *“Results from new projections of the SEDAR 52 assessment indicate that increasing gulfwide shrimp effort by 8% (i.e., reducing the shrimp effort threshold to 60% of 2001-2003 average levels) would be unlikely to substantially impact ABCs for Gulf of Mexico red snapper.”*

- As set forth in Table 3 of the SEFSC paper, the red snapper ABC would be reduced by only 100,000 pounds in 2032 under a 60% target reduction goal scenario (i.e., from 13.0 million pounds to 12.9 million pounds), and the ABC would be reduced by only an additional 100,000 pounds in 2032 under a 56% target reduction goal scenario.
- *“Additionally, compared to previous assessments and associated projections.....the relatively high natural mortality values assumed for age-0 and 1 fish (i.e. those ages primarily caught as bycatch in shrimp trawls) like acts to additionally reduce the impact of shrimp bycatch on rebuilding schedules. Because a higher proportion of these juvenile fish are assumed to die from natural causes, shrimp bycatch has a lesser impact on the resource, and moderate increases in shrimping effort is unlikely to greatly impact ABCs.”*

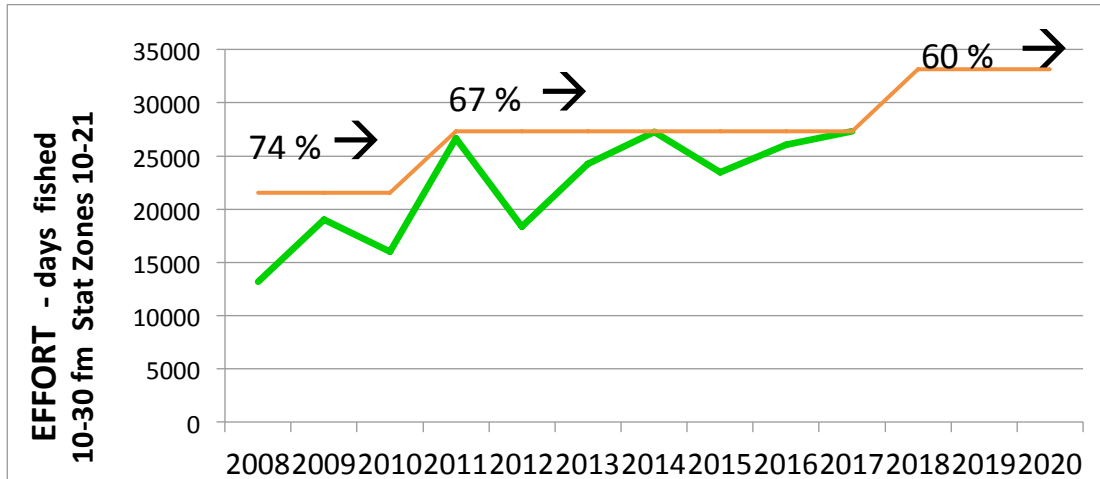
With further respect to this last conclusion of the SEFSC paper, we further note that in a March 2017 paper by Dr. Benny Gallaway et al., *“An Updated Description of the Benefits and Consequences of Red Snapper Shrimp Trawl Bycatch Management Actions in the Gulf of Mexico”*, the following conclusion was made:

- *“...natural mortality of these young fish is much higher than previously thought, and that the shrimp trawl fishery only accounts for 4% of the total mortality of juvenile red snapper.”*

Based on these inputs, the Council initiated Amendment 18 at its August 2018 meeting. The Amendment included in Action 1, three options for reducing the shrimp effort target reduction goal to 63%, 60% and 56% - options a, b and c, respectively. A fourth option to spread-out the reductions to 60% or 56% until the year 2032 was removed from the draft Amendment at the Council’s October 2018 meeting. At its January 2019 meeting, the Council selected as its preferred alternative the option set forth in Action 1, Option b; to relax the shrimp effort reduction threshold to 60%.

While it is clear, according to the analysis performed by the SEFSC, that relaxing the target reduction goal to as much as 56% percent would only reduce the red snapper ABC by an additional 100,000 pounds, SSA believes that a 60% target reduction goal represents a reasonable and thoughtful approach that conforms with the statutory requirement to provide fair and equitable sharing of red snapper recovery benefits among all sectors of the fisheries. Further, this option is mindful of both the Council’s specific request to the SEFSC, and of the conservation objectives of the red snapper rebuilding plan. Thus, SSA supports the Council’s Preferred Option b to relax the target effort reduction goal to 60%.

The following graphic illustrates the effect of this option once implemented. A 60% effort reduction threshold would translate to a fishing effort cap of 33,124 days fished; a net increase of 5,796 fishing days.



Data Source: Rick Hart, SEFSC, NMFS, pers. comm.

The adoption and implementation of this measure will provide stability and certainty to the shrimp fishery and avoid the potential for an unnecessary and costly time-area closure in the Gulf in order to account for any potential further increases in shrimp fishing effort in the 10-30 fathom depth areas within Statistical Zones 10-21. As concluded by the SEFSC, this Option will not substantially impact future red snapper ABCs or alter the rebuilding schedule.

Amendment 18: Action 2

Amendment 18, Action 2, further sets forth authority for the Council to use a standard open framework action to make future changes to the target effort reduction goal for the shrimp fishery.

SSA supports this measure, which is intended to facilitate timely adoption and implementation of any further modifications in the future without the need of a full plan amendment.

That said, SSA states emphatically that the Council must provide the shrimp industry, including through the Shrimp Advisory Panel, the opportunity to consider options and provide specific inputs and recommendations to the Council with respect to any future proposed modifications to the target effort reduction goals through a framework process.

Finally, Amendment 18, Action 2, also includes the following provision:

“Modify the abbreviated documentation process to allow specification of an ABC recommended by the Council’s Science and Statistical Committee (SSC) based on results of a new stock assessment and using the ABC control rule.”

SSA understands that this provision applies only with respect to the Gulf of Mexico Royal Red shrimp stock, which is the only managed shrimp stock for which an ABC is set, and that it is

intended to harmonize this framework authority with the same authorities provided for other stocks under the Council's management authority. SSA does not object to this provision.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "John Williams". The signature is written in a cursive style with a large initial "J" and "W".

John Williams,
Executive Director