

**August 31, 2018**

**100 Davisville Pier  
North Kingstown, R.I. 02852 U.S.A.  
Tel: (401)295-2585**

Dear Dr. Boreman and SSC Members,

I am writing to request an increase in illex quota for 2018, for 2019, and to develop a mechanism to allow in-season increases to the established quota in high abundance years. The Mid Atlantic Council's Ecosystem Approach to Fisheries Management Guidance Document, intended to help inform management policy moving forward, indicates both high exposure and positive impacts to illex squid resulting from climate change.<sup>1</sup> For the past two years, illex abundance has been at historic highs and the quotas reached in record time, causing unprecedented early closures in mid-September in 2017 and mid-August in 2018. Seafreeze vessels typically harvest illex into November, and this year's early closure will cost us significantly in lost earnings and wages alone, not to mention the lost export revenue and other multipliers as the product moves through the economy. The high abundance of illex throughout its range has even caused post-spawning, short lived illex to wash up dead on Nova Scotia beaches in 2018.<sup>2</sup> The huge biomass of squid in U. S. waters will face a similar end in the coming months. Prior to both the 2017 and 2018 closures, our vessels were harvesting illex in excess of 400 grams (per squid). This forgone yield is a waste of sustainable harvest opportunity, as well as \$2 million per 1,000 mt of economic activity to the industry.

We believe the SSC has the information necessary to increase the 2018/2019 quotas, as well establish a mechanism for in-season increases, as is allowable under existing regulation. NEAMAP survey indices for 2017 and 2018 show exponential increases of illex compared to previous years. NEAMAP CPUE (count/km<sup>2</sup>) for illex range from 0.0-16.04 for the years 2008-2016; in 2017 the number was 4,826.74 and in 2018 was 1,563.41. The 2017 survey was later in the year than normal due to vessel damage; however, it is indisputable that illex abundance in the last two years is unprecedented within the past ten years.

The illex stock is a single stock from Newfoundland to Florida, but managed by NAFO in the northern areas and the U.S. in the southern areas of the stock range. The northern NAFO areas are currently assigned an annual quota of 34,000 mt,<sup>3</sup> which goes primarily unharvested. Removals or lack of removals from one stock component/area affect the other, as illex is a single stock throughout its

---

<sup>1</sup> See

<https://static1.squarespace.com/static/511cdc7fe4b00307a2628ac6/t/589a2b61d2b8575c64fe05ff/1486498674225/EAFM+Guidance+Doc+2017-02-07.pdf>, page 22.

<sup>2</sup> See <https://www.cbc.ca/news/canada/nova-scotia/squids-dying-nova-scotia-1.4699593>.

<sup>3</sup> See <https://www.nafo.int/Portals/0/PDFs/Advice/2016/sqi.pdf>.

range.<sup>4</sup> Therefore, the U.S. could increase its allowable domestic harvest substantially, in accordance with the unused portion of the NAFO quotas, without any harm to the stock.

Furthermore, the NAFO Scientific Council recommendation of 34,000 mt for the northern area is based on a “low productivity state”. Their advice states that “Conventional reference points are inappropriate for squid stocks because of their unique life history. Two reference states, ‘high productivity’ or ‘low productivity’ states are defined by trends in stock biomass and mean body weight. Low productivity periods have an estimated potential annual yield of 19,000 tons to 34,000 tons. The potential yields of a high productivity state have not been determined.”<sup>5</sup> The current U.S. ABC is less than the mean of this range (24,000 mt as opposed to 26,500 mt). As is apparent from catch rates and high abundance indices for 2017-2018, as well as the sizes of the catch composition, the illex stock is now in a high productivity state. We would request that the U.S. adopt a 34,000 mt harvest level for 2018- 2019, minus average NAFO catch, allowing the SSC time to consider what might be a potential harvest level for a “high productivity state” in U.S. waters going forward. NAFO quotas have been in much higher ranges in the past, presumably under high productivity states, and catches of Argentinian illex can exceed 600,000 mt in a good season. Daily catch rates are now available due to daily reporting requirements for illex, which may be useful for determining criteria for in-season adjustments in years of high abundance.

Such an increase can still be considered precautionary management. As the Committee is well aware, illex is an oceanic species that primarily resides off of the continental shelf, is only partially available to the fishery, and ranges to areas where it is not commercially harvested, such as southern Florida.<sup>6</sup> The only U.S. directed fishery occurs in the GARFO region, on a small strip of the continental shelf where the fish become seasonally available. We have provided copies of charts depicting both the range of the stock (colored with orange hashed lines) and the primary legal areas of harvest (depicted by a narrow green line). The fishery is limited naturally by season and by space due to existing fishery regulations. Although the fish exist in prohibited areas, we are not legally allowed to harvest illex in the Tilefish Gear Restricted Areas in Norfolk, Veatch, Oceanographer, and Lydonia Canyons. We are also not allowed to harvest illex in the Lobster Gear Restricted Area III from June through November, between Hudson and Atlantis Canyons. Bottom trawling, and therefore illex fishing, is prohibited in the Mid Atlantic Deep Sea Coral Zones, and all commercial fishing prohibited in the Marine Monument. Small mesh, and therefore illex harvest, is prohibited in the large mesh only areas east of Nantucket, except for certain illex exemption areas. When all of these areas are accounted for, more potential fishing area is “protected” than is open for harvest.

We do not believe keeping the illex quotas artificially low in high abundance regimes or years provides the greatest overall benefit to the nation, per the Magnuson Stevens Act. Rather, we believe that increasing the quota for 2018/2019, as well as establishing a mechanism to allow for in-season

---

<sup>4</sup> Ibid.

<sup>5</sup> Ibid.

<sup>6</sup> See

[https://static1.squarespace.com/static/511cdc7fe4b00307a2628ac6/t/572ce5fd555986e106faf6fd/1462560255781/squid\\_data\\_update\\_2016.pdf](https://static1.squarespace.com/static/511cdc7fe4b00307a2628ac6/t/572ce5fd555986e106faf6fd/1462560255781/squid_data_update_2016.pdf). Deepwater shrimpers occasionally have to relocate their fishing activity in southern Florida due to illex squid interactions, of which the SSC may not be aware.

increases in other high abundance years will allow the fishery to take advantage of both natural variability as well as increased abundance due to climate impacts.

Thank you for your consideration.

Sincerely,



---

Glenn Goodwin  
Owner, Seafreeze Ltd. and Seafreeze Shoreside

CC:

Chris Moore, Executive Director, Mid Atlantic Fishery Management Council

Jason Didden, Staff, Mid Atlantic Fishery Management Council

Michael Pentony, Regional Administrator, Greater Atlantic Regional Office, NOAA Fisheries

Doug Christel, Greater Atlantic Regional Office, NOAA Fisheries