

Mid-Atlantic Fishery Management Council  
Ecosystem Based Fishery Management Policy  
Discussion Draft

**Proposed Goal Statement (modified new)**

*To manage for ecologically sustainable utilization of living marine resources while maintaining ecosystem productivity, structure, and function.*

**MAFMC Ecosystem-Based Fishery Management Guidance (EBFMG) Document  
Purpose and Need Statement**

*The purpose of the EBFMG document is to enhance the Council's species-specific management programs with more ecosystem science and policies to coordinate management across its Fishery Management Plans (FMPs) and associated ecosystems. The EBFMG document will provide a framework to evaluate effects of different policy choices on FMP species and ecosystems.*

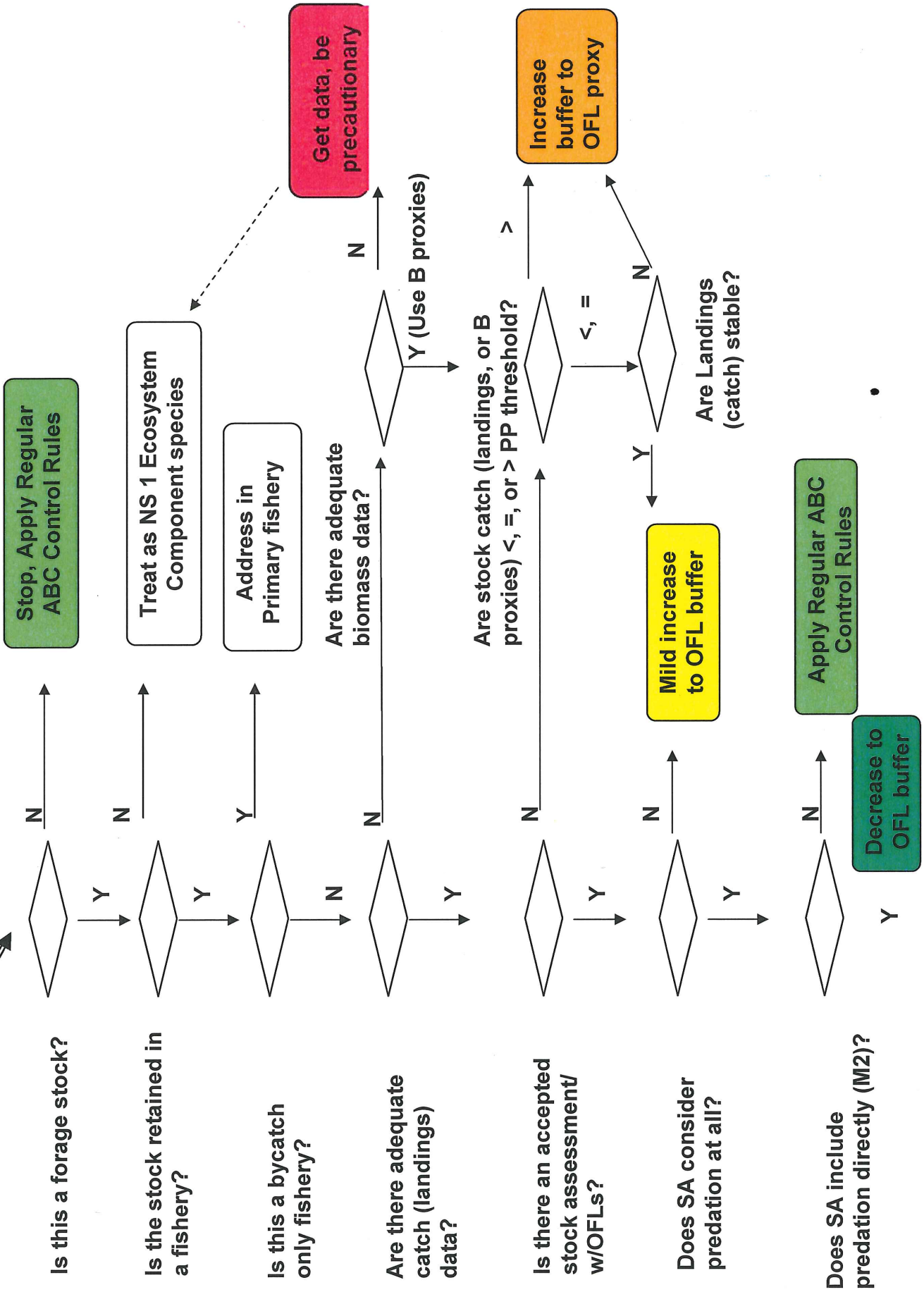
*The Council needs an ecosystem-based fishery guidance document in order to:*

- 1. Improve management decisions and the administrative process by incorporating biophysical and socio-economic information on ecosystem climate conditions, climate change, habitat conditions and ecological interactions.*
- 2. Include adequate buffers against environmental and human-induced impacts to the marine environment in fisheries management measures.*
- 3. Include effects on ecosystem species, habitat and fishing communities in new and existing management measures.*
- 4. Coordinate information across FMPs for decision-making within the Council process and for consultations with other regional, national, or international entities on actions affecting ecosystems or FMP species.*
- 5. Identify and prioritize research needs and provide recommendations to address gaps in ecosystem knowledge, particularly with respect to the cumulative effects of fisheries management on marine ecosystems and fishing communities.*

**SSC ESC Modified Draft 28 Mar 2012**

Regular info input to OFL/  
ACL/ABC process

**NEW**





*Conserving Ocean Fish and Their Environment  
Since 1973*

March 7, 2012

Rick Robins, Chairman  
Mid-Atlantic Fishery Management Council  
Suite 201, 800 N. State St  
Dover, DE 19901

Dear Mr. Robins,

On behalf of the National Coalition for Marine Conservation (NCMC), I am writing in advance of the April meeting to request that you make the draft Terms of Reference (TORs) for Atlantic mackerel, *Loligo*, *Illex* and butterfish acceptable biological catch (ABC) recommendations available in the Council's April meeting materials for Squid, Mackerel, Butterfish Committee discussion and stakeholder feedback.

All four of the species managed under the Atlantic Mackerel, Squid and Butterfish Fishery Management Plan are categorized as Level 4 stocks because their stock assessments lack point estimates and probability distributions of the overfishing limit (OFL). According to current regulations implementing the Council's ABC control rule and risk policy, ABC cannot be increased for stocks without an OFL or OFL proxy. Through Framework Adjustment 6 to the Atlantic Mackerel, Squid and Butterfish Fishery Management Plan, the Council intends to clarify that the SSC, *in limited circumstances*, has the flexibility to deviate from this risk policy and increase the ABC.<sup>1</sup> However, the criteria under the framework's action alternative (Alternative 2) are too vague to sufficiently limit the circumstances for not applying the risk policy. In addition, without the methodology determined beforehand, ABC deliberations for Level 4 stocks become more vulnerable to political pressure.

While NCMC does not support Alternative 2 for the above-mentioned reasons, we realize that TORs can play an important role in guiding ABC deliberations and in providing further direction to the SSC about Council expectations for applying the risk policy, including how to provide and demonstrate sufficient precaution when the default risk policy is not used. The Omnibus Amendment states that it is the Council's intent that "ABC recommendations should be more precautionary as an assessment moves from level 1 to level 4"<sup>2</sup>; however, the Council thus far has not provided direction for how this is to be accomplished for Level 4 stocks for which an ABC increase is recommended.

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<sup>1</sup> See February 2012 draft of Framework Adjustment X to the Atlantic Mackerel, Squid and Butterfish FMP, p. 4

<sup>2</sup> Omnibus Amendment, April 2011, p.45


According to the Council's newly revised Statement of Organization Practices and Procedures (SOPPs):

"The Council Chairman, in consultation with the Executive Director and the Chair of the Species Committee that has responsibility for a stock under consideration, shall develop a set of terms of reference based on the relevant ABC control rule that will guide the work of the Committee in developing ABC recommendations for that stock. The terms of reference will specify a date by which all material to be considered by the Committee will be provided. This date shall be at least 15 working days prior to the Committee meeting. The Committee is not obligated to consider any material submitted after this date."  
*(See SOPPs, Section 2.7.1.2)*

Making the draft Atlantic mackerel, squid and butterfish Terms of Reference available in the April meeting materials will allow committee and public review and input as you develop TORs for this year's ABC deliberations. Making them available at this time would be consistent with the procedure described within the SOPPs. It would make the specifications process more robust and foster greater understanding and support among stakeholders. And it would provide advance notice to those interested in submitting materials relating to the TORs for SSC consideration, so the materials are submitted as expeditiously as possible and in accordance with the deadline.

Thank you for your consideration of this request.

Sincerely,



Pam Lyons Gromen  
Executive Director

cc: Erling Berg, Chairman, Squid, Mackerel, Butterfish Committee  
Dr. Chris Moore, MAFMC Executive Director  
Rich Seagraves, MAFMC Fishery Management Specialist