



October 2, 2020

Mike Luisi, Chair
Dr. Chris Moore, Executive Director
Mid-Atlantic Fishery Management Council
800 North State St., Suite 201
Dover, DE 19901

RE: BULLET AND FRIGATE MACKEREL FRAMEWORK IN 2021 IMPLEMENTATION PLAN

Dear Mr. Luisi and Dr. Moore,

Our organizations are dedicated to the conservation of fishery resources and to preserving fishing opportunities for future generations. A healthy forage base is critical for supporting recreationally and commercially-important fish stocks, and we commend the Mid-Atlantic Fishery Management Council for establishing a Strategic Plan objective to support the maintenance of an adequate forage base.ⁱ When the Council's Executive Committee convenes on October 5th, we ask that you advance this objective by firmly committing to pursue a framework action to add bullet mackerel (*Auxis rochei*) and frigate mackerel (*Auxis thazard*) to the Unmanaged Forage Omnibus Amendment in the 2021 Implementation Plan.

Research investigating the trophic dynamics of large migratory fish in the U.S. Atlantic has revealed that bullet mackerel and frigate mackerel are key prey species in the offshore pelagic food web, especially for wahoo (*Acanthocybium solandri*), blue marlin (*Makaira nigricans*), and yellowfin tuna (*Thunnus albacares*).^{ii,iii} Because bullet and frigate mackerel are a major food source for economically-important species that range throughout the Atlantic,^{iv} the Mid-Atlantic Council attempted to safeguard their ecological role by including both species in the Council's Unmanaged Forage Omnibus Amendment. However, in the final rule implementing the Unmanaged Forage Amendment, NOAA Fisheries Greater Atlantic Regional Office (GARFO) excluded bullet and frigate mackerel from the list of forage species. The agency acknowledged that "bullet and frigate mackerel are important prey, particularly for large pelagic species such as tuna, billfish, and sharks"^v and cited two primary reasons for the decision: 1) *Auxis spp.* did

not appear significantly in the diets of the MAFMC-managed species or systematically in catches of MAFMC-managed fisheries; and 2) the maximum size of *Auxis spp.* exceeded the maximum size of forage species as defined by the MAFMC's Science and Statistical Committee (SSC).^{vi}

Pursuing alternative strategies to conserve bullet and frigate mackerel, the Mid-Atlantic Council, in March 2018, sent a letter to the South Atlantic Fishery Management Council requesting that it consider actions to protect these important forage species because of the strong predator-prey link between wahoo and *Auxis spp.* The South Atlantic Council received overwhelming support from the fishing public, its SSC and its Dolphin Wahoo and Habitat Advisory Panels to designate bullet and frigate mackerel as ecosystem component (EC) species through an amendment to the Dolphin Wahoo Fishery Management Plan (FMP), a plan with a geographic range from Maine to the Florida Keys. Last month, South Atlantic Council members voted unanimously to designate bullet mackerel and frigate mackerel as EC species through Amendment 12 to the Dolphin Wahoo FMP. The South Atlantic Council stopped short of including regulatory measures in its plan after analyses indicated that the mackerels have largely been landed commercially in the mid-Atlantic region using gill net, pound net, float trap, and otter trawl gear, none of which are allowable gear types in the dolphin wahoo fishery.^{vii} Under advice from the National Marine Fisheries Service, the South Atlantic Council decided the best course of action would be for the Mid-Atlantic Council to take up regulatory measures, believing that the EC designation would help the Mid-Atlantic Council's justification for protecting the species' role in the food web.

The South Atlantic Council's Dolphin Wahoo Amendment 12 and supporting analyses provide a sound argument for the important role of bullet and frigate mackerel in the Atlantic forage base. Amendment 12 data also point to incidental catch occurring mainly in the mid-Atlantic, an issue that should be investigated in greater depth using up-to-date information. In light of escalating demand for forage fish products,^{viii} prohibiting the development of fisheries for unmanaged prey species, like bullet and frigate mackerel, until adequate science is available to assess and avoid negative impacts, is a proactive, ecosystem-based management approach that will help ensure sustainable fisheries for the future. We believe now is the time to freeze the fishing footprint for bullet and frigate mackerel, before directed fisheries for these vital unmanaged prey species develop. To close the loop on both recognizing and protecting bullet and frigate mackerel as species important to the ecosystem, work that the Mid-Atlantic Council set out to achieve four years ago, adding bullet and frigate mackerel to the list of unmanaged forage species through a straightforward framework action should be elevated as a priority in the 2021 Implementation Plan.

Sincerely,

Pam Lyons Gromen
Executive Director
Wild Oceans

Willy Goldsmith, Ph.D.
Executive Director
American Saltwater Guides Association

Michael W. Waine
Atlantic Fisheries Policy Director
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Jason Schratwieser
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International Game Fish Association

ⁱ Mid-Atlantic Fishery Management Council. December 2019. 2020-2024 Strategic Plan.

ⁱⁱ Rudershausen, P. J., Buckel, J. A., Edwards, J., Gannon, D. P., Butler, C. M., & Averett, T. W. (2010). Feeding ecology of blue marlins, dolphinfish, yellowfin tuna, and wahoos from the North Atlantic Ocean and comparisons with other oceans. *Transactions of the American Fisheries Society*, 139(5), 1335-1359.

ⁱⁱⁱ Poland, Stephen. (2018). Ecological importance of Auxis spp. as prey for dolphin and wahoo [PowerPoint Slides]. Retrieved from http://safmc.net/download/Briefing%20Book%20Council%20Mtg%20Dec%202018/TAB%2004%20-%20Dolphin%20Wahoo/TAB04_A02d_Presentation_Eco_Importance_of_Auxis.pdf.

^{iv} In the U.S. Atlantic, HMS angling supports an estimated 2,725 jobs and generates a total economic output of \$393 million. (NOAA Fisheries. 2017. Saltwater Recreational Fisheries: Atlantic Highly Migratory Fisheries Snapshot.)

^v NOAA Fisheries Greater Atlantic Regional Office. (June 19, 2017). Letter from Regional Administrator John Bullard to Mid-Atlantic Fishery Management Council Chairman Mike Luisi.

^{vi} It is important to note that research led by Steve Poland found that bullet and frigate mackerel rarely exceed 35 cm (14 inches) in U.S. water, a size that would fit with the Mid-Atlantic SSC's forage definition. (See note iii.)

^{vii} South Atlantic Fishery Management Council. Amendment 12 to the Dolphin Wahoo Fishery Management Plan: Add Bullet Mackerel and Frigate Mackerel as Ecosystem Component Species. Regulatory Impact Review, Regulatory Flexibility Analysis, and Fishery Impact Statement. August 2020 DRAFT.

^{viii} Froese, R., et al. (2011) *as summarized in* Pikitch, E., Boersma, P.D., Boyd, I.L., Conover, D.O., Cury, P., Essington, T., Heppell, S.S., Houde, E.D., Mangel, M., Pauly, D., Plagányi, É., Sainsbury, K., and Steneck, R.S. 2012. *Little Fish, Big Impact: Managing a Crucial Link in Ocean Food Webs*. Lenfest Ocean Program. Washington, DC. 108 pp.