



Mid-Atlantic Fishery Management Council

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MEMORANDUM

Date: 12 Dec 2013
To: Council
From: Jim Armstrong, Staff Lead Spiny Dogfish FMP
Subject: Council Options for Commercial Trip Limits for 2014 - 2015

Action:

Recommend, as necessary, revisions to spiny dogfish trip limits for 2014-2015

Background:

At the October meeting in Philadelphia, PA, the Council adopted the following motions regarding trip limits in fishing years 2014-2015:

Move to maintain a 4,000 daily trip limit, but also allow a 20,000 lb. weekly trip limit for spiny dogfish in 2014 and 2015.

Nolan/Kaelin

Motion withdrawn

Move to direct the AP and staff to explore the development of cumulative trip limits or the elimination of trip limits.

Nolan/Kaelin

Approved by consent

As an initial step in addressing the Council's direction to staff, the NERO was consulted by staff regarding the feasibility of cumulative trip limits. Excerpts from a staff to staff response are below:

"Basically, we cannot monitor/enforce landing limits that apply over multiple trips, so a cumulative (weekly) landing limit is not something we should consider. However, we could model dogfish trip limits like scup, where we set the Federal possession limit at the desired weekly landing limit (e.g., 20,000 lb), which is enforceable.

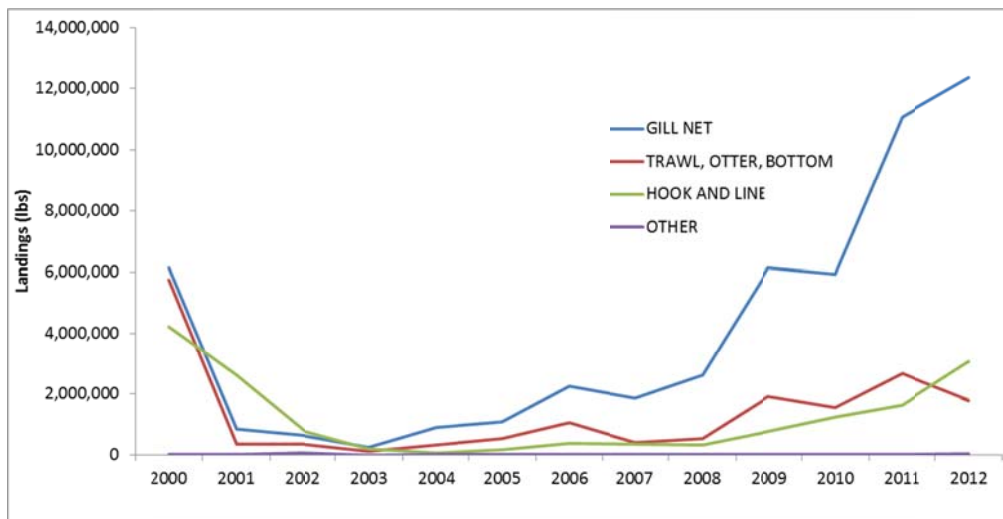
However, this assumes that all of the states would prefer a weekly landing limit, which may not be the case for dogfish.

"It may be easier to consider an unlimited Federal possession limit, since the quotas are not constraining to the current fishery conditions. The purpose of a possession limit is to maintain some consistent fishing opportunities throughout the year, but there is no present need for such a constraint with quotas so high. It is implicit that the Commission/states would set trip limits appropriate for their fisheries, but this may vary from state to state. Again, consultation with the Commission would be a good idea.

"In either case, it may be tight to get a possession limit change by May 1. Basically, the Mid has already technically just approved 2014-2015 specs (with status quo possession limits). Presumably, New England will approve the same specs in November, but if the Councils want to recommend a possession limit change, it will have to go through both Councils again. Modifying the already approved specs would technically require a framework (2 more meetings for each Council), but you could put it on the December Council meeting agenda as "revisiting" the specifications, and make a final recommendation on possession limits and other specs."

As requested, the issue was also discussed with the Spiny Dogfish AP.

The prevailing sentiment from the AP was that while a trip limit in excess of the current level could increase flexibility for some participants, it may be unwarranted under current market conditions and, additionally, multi-day landings may negatively affect quality. It was stated that a very large trip limit might lead back to the problems encountered with the fishery in years past. Note that there are no trawl fishery representatives on the dogfish AP. Trawl landings are about 10% of total spiny dogfish landings.



Spiny dogfish landings by gear category based on 2000-2012 VTR data.

The issue of cumulative trip limits was also discussed by the Spiny Dogfish Management Board at its October meeting in St Simon's Island, GA. Note that the Commission matched the Council's recommended quotas for 2014/2015 and maintained 4,000 lb trip limits in their specifications. Feedback from Commission staff on the trip limit is below:

"The key issue is that the law enforcement committee said they would not be able to enforce cumulative trip limits. The Board was divided: some states said it was feasible (RI) while others thought increasing the trip limit would be an easier way to manage the issue. There was also some concern with having a cumulative trip limit in state waters, and no cumulative trip limit in federal waters."

Direct communication by staff with ASMFC Board members:

RI has a system in place to accommodate the enforcement concerns associated with multi-day limits. They require that the vessel be a participant in the aggregate permit program and that an active VTR be maintained. Feedback from MA was not supportive of larger trip limits and it was suggested that larger vessel level landings associated with increased limits would depress the price per pound even further. According to current dealer reports, the price per pound is approximately \$0.15/lb.

Conclusion/Recommendation:

Increasing the trip limit and the effect on total landings and the landings rate may not be advisable at this time. If the market were to change such that it could accommodate a greater rate of landings, then an option would be to establish, via framework, an allowance for trip limits to change in-season.