

**From:** [Moore, Christopher](#)  
**To:** [Muffley, Brandon](#)  
**Subject:** FW: Illex Industry / SSC Comments  
**Date:** Monday, May 24, 2021 12:00:42 PM

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**From:** Greg DiDomenico <gDiDomenico@lundsfish.com>

**Date:** Friday, May 21, 2021 at 4:35 PM

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**Subject:** Illex Industry / SSC Comments

Dear Dr. Rago,

On behalf of Lund's Fisheries, Cape Seafoods, The Town Dock, NORPEL and Seafreeze we offer the following comments and questions and respectfully request a response.

During the May 10<sup>th</sup> and 11<sup>th</sup> SSC meeting a determination was made of the most important **"sources of uncertainty"** associated with the illex assessment.

They are the following:

1. The extent, distribution and magnitude of the illex stock remains poorly defined.
2. We lack biomass and exploitation rate estimates for this species.
3. The extent to which the catch is driven by variation in availability to the fishery as opposed to variation in underlying abundance remains largely unknown.
4. The reliability of the F 40% Fmsy proxy as a foundation for decision making is.
5. The level, extent and inter – annual variability in immigration into, emigration from and recruitment to the stock.

The industry respectfully requests that the SSC determine a similar list entitled **"sources of**

**certainty”.**

We thought we would offer a few for your consideration:

1. According to the most recent NAFO assessment, since 2017 Fishery catches have been relatively high in all NAFO regions since 2017 . At the same time abundance indices from fisheries independent have also been high in all NAFO regions. The indices are at levels that have not been observed since 2006 and in some cases they are higher. The fact that fisheries catches and fisheries independent survey indices of abundance for Illex are at high values throughout the northwest Atlantic suggests that the stock is in a high productivity state.
2. Significant portions of the species range serve as a refuge from fishing mortality and serve as areas of “escapement”. The US fishery occurs primarily in 2 small areas of the outer edge of the continental shelf in Southern New England and Mid Atlantic Bight that is estimated to be only about 900 square nautical miles. Areas that are not fished includes the shelf slope sea where the squid are known and documented to be abundant.
3. In addition to the refuge from fishing provided to the squid in the shelf slope sea, and by their pelagic lifestyle, fishery regulations, including the Frank R. Lautenberg Deep-Sea Coral Protection Area, the Northeast Canyons , the tilefish and lobster gear restricted areas, and other regulated mesh areas in Southern New England and the Mid Atlantic Bight that prohibit the use of small mesh trawls. Industrial scale fishing for squid is also limited by fishery regulations in Canadian waters including the Scotian shelf. A recent analysis by members of the Illex Working Group indicated that less than 1.2% of the species range that could be documented using routine fishery independent surveys of the continental shelf was accessed by the US fishery. In that analysis 98.2% of the area occupied by the species on the shelf is not fished and are undisturbed.
4. As a result a large portion of the species range is therefor not fished and thus provides for fishery escapement for Illex population which appears to be in a high productivity state on the basis of available data fishery dependent and independent data.

In addition to this we ask the SSC to answer the following in regards to their list of “uncertainties”.

1. Which sources of uncertainty could be evaluated by our current knowledge of the species?
2. Which sources of uncertainty cannot be evaluated in a way that satisfies SSC standards?
3. Why have these sources of uncertainty remained uncertain, unidentified, unpursued or unknown?

Thank you.

Greg DiDomenico  
Lund’s Fisheries

