



September 19, 2021

Randy Blankinship, Chief,  
Atlantic Highly Migratory Species Management Division  
263 13<sup>th</sup> Avenue South  
Saint Petersburg FL 33701

Re: Amendment 13 – Purse Seine Quota Reallocation

Dear Randy,

ABTA would like to share with you some thoughts regarding the reallocation of Purse Seine Category quota in the context of Amendment 13.

We've noted in the DEIS, that the Agency's preferred alternative is to, "Reallocate proportionally among the directed categories (General, Harpoon, Angling and Reserve quota categories; *not to the Longline or Trap categories because they are incidental quota categories*)."

Our position: To place the entire purse seine quota in the Reserve for distribution during each year to the directed categories based upon need and based upon the intent to minimize annually under-utilized quota, equally. Herebelow are supporting arguments.

#### Avoiding an Increase in Under Utilized Quota

U.S. regulation regarding Pelagic Longline has long resulted in the U.S. incurring unutilized quota in each year. The result can be considered an "institutionalized under-utilization" of bluefin quota for the U.S. The ICCAT provision for a 10% rollover doesn't come close to mitigating in these circumstances. The Agency's preferred alternative as stated in the DEIS would increase that under-utilization. Avoiding an increase in under-utilized quota for a high-value species such as bluefin tuna would be in the Nation's best interest and should be a high priority.

The tables below show quota available to the Recreational Category for the period, 2015-2019 under a constant U.S. TAC scenario of 1,058.8 mt for 2015-2017, and of 1,247.9 mt for 2018-2019. **Table 1**

computes Recreational quota at the present constant of 19.7% of the total U.S. TAC p.a., and **Table 2** computes Recreational quota for the same period at a constant of 23.3% p.a., in accordance with the Agency’s preferred alternative. Accurate catch statistics are applied in each year, with resultant differential (quota less catch), also expressed as a percentage of total U.S. annual TAC. **Table 2**, in this instance, is being used as a proxy for future quota/catch statistics. Therefore, **Table 2** expresses the typical outcome of this preferred alternative, using this recent catch data.

Therefore, during the period, 2015-2019, these statistics indicate that under the present FMP percentage, 428.3 mt of Recreational quota was not utilized by the U.S. In the same period, by increasing the FMP percentage to 23.3%, as proposed in the DEIS, a total of 683.5 mt would have been unutilized. Both scenarios represent a significant net loss to the Nation.

**TABLE 1**

Calculation of under-utilization of Recreational quota basis FMP percentage of 19.7%

	2015 (MT)	2016 (MT)	2017 (MT)	2018 (MT)	2019 (MT)
US TAC	1058.8	1058.8	1058.8	1247.9	1247.9
US Rec TAC	208.6	208.6	208.6	245.8	245.8
US Rec Landings	112.9	143.7	140.1	112.5	179.9
Unutilized Quota	95.7	64.9	68.5	133.3	65.9
Unutilized quota % of total TAC	9.04%	6.13%	6.47%	10.68%	5.28%

Source: 2020 HMS SAFE Rpt

**TABLE 2**

Calculation of under-utilization of Recreational quota basis FMP percentage of 23.3%

	2015 (MT)	2016 (MT)	2017 (MT)	2018 (MT)	2019 (MT)
US TAC	1058.8	1058.8	1058.8	1247.9	1247.9
US Rec TAC	246.7	246.7	246.7	290.8	290.8
US Rec Landings	112.9	143.7	140.1	112.5	179.9
Unutilized Quota	133.8	103.0	106.6	178.3	110.9
Unutilized quota % of total TAC	12.6%	9.7%	10.1%	14.3%	8.9%

Source: 2020 HMS SAFE Rpt

Consequently, in this exercise, increasing the FMP percentage for the Recreational Category from 19.7% to 23.3% would have resulted in an additional net loss of 255.2 mt for the period 2015-2019.

In our view, it is not necessary to incur this loss of quota to achieve the purposes intended. This can be avoided by placing all the purse seine quota in the Reserve and allocating it during the season on the basis of need to the directed categories, individually.

#### Considerations Relating to MSE

ICCAT has estimated that there is substantial mixing of eastern bluefin on western fishing grounds. In particular, the percentage of eastern juveniles found in west catch is estimated to be very high as compared with mixing of older fish; eastern juveniles are estimated to represent approximately 80% of western juvenile catch.

In accordance with the upcoming MSE, a determination will be required in 2023 as to the level of mortality of eastern fish by western harvesters. If this mortality of eastern fish is deemed to exceed a certain threshold, a downward adjustment will need to be made to west TAC based upon a predetermined ratio of western to eastern fish. This adjustment could be substantial.

The possible negative ramifications of the foregoing would affect overall west TAC, thereby affecting Canadian and Japanese quota, as well. Canadian and Japanese harvesters do not target juvenile bluefin. Therefore, care should be taken to avoid a potential decrease in TAC as a result of a potential increase in fishing effort/mortality of juveniles. Consequently, it would not be advisable to create regulation that would provide for this possibility if there is an alternative which essentially achieves the same result while at the same time providing the Agency with the flexibility to manage redistribution of PS quota under circumstances presented by the MSE.

#### Summary

It is far easier to increase the percentage stipulated in the FMP, representing the amount of bluefin quota received by a specific sector of the fishery, than it would be to take it away. Given all the foregoing arguments, a precautionary approach is advisable. Placing purse seine quota in the Reserve and distributing it on an as-needed basis to directed categories capably addresses the problem and achieves the purposes intended. This alternative provides the Agency with the potential to avoid an increase in underutilized quota, provides an opportunity to explore important biological questions and allows for an analysis of possible negative effects to western TAC pursuant to the MSE.

Cordially,

David Schalit, President  
American Bluefin Tuna Association

cc: ABTA Board