



**CARIBBEAN FISHERY MANAGEMENT COUNCIL**  
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November 12, 2013

Honorable John D. Rockefeller IV  
Chairman  
United States Senate  
Committee on Commerce, Science  
and Transportation  
Washington D.C., 20510-6125

The Honorable Mark Begich  
United States Senate  
111 Russell Senate Office Building  
Washington, D.C. 20515-0201

Re: Priorities regarding the reauthorization of the Magnuson-Stevens Act

Dear Sirs:

It is my pleasure to address the request for comments on issues related to the Southeast Regional Perspectives on the Reauthorization of the Magnuson-Stevens Act (MSA).

First, we would like to endorse the letter dated November 8, 2013, submitted to Honorable Doc Hastings and Honorable Mark Begich by the eight Regional Fishery Management Councils, referring to the consensus statement on priorities for the reauthorization of the MSA.

Second, we want to present some topics specific to the US Caribbean:

- The US Caribbean is considered a “data-poor” area. This constitutes a major challenge to determine overfishing limits (OFLs), annual catch limits (ACLs), among others. The development and implementation of OFLs and ACLs for our fishing grounds is very difficult to achieve when you have multiple species and very little trustworthy information for the species involved. This calls for more funding or adoption of different strategies and methodologies to obtain the information needed for establishing these parameters. Due to the budgetary situation faced at a national level, substantially increasing the funds for scientific studies is probably not in the horizon. Therefore, we will need more flexibility in setting these levels of fishing. Presently, the law dictates that when data is scarce, the buffer between OFL and ACL should be larger. This causes unnecessary economic hardship to our fishers.

Actually, what you hear most from local fishers is the question “why do we have to be penalized for the inability of the government to obtain and process statistical data on time

to avoid these unfair closures? Hence, we want to emphasize the need to amend the MSA to provide for flexibility in the process to determine the levels of fishing that will provide for sustainability of the resource with the minimum amount of economic burden to the fishing industry, both commercial and recreational.

Another point we want to bring to your attention is the need to effectively include information and scientific assessment of the socio-economic component of the ecosystem-based management approach.

The CFMC is moving towards the implementation of island-based FMPs. The idea is to consider island areas as a whole for fishery management purposes. This will focus management actions specific for each area, rather than adopting a blanket set of management measures across the entire Caribbean EEZ as we do now, which results in unfair treatment of some of the islands communities. As an example, while in the St. Thomas/St. John area the fishing is mostly market-driven, the measures applied to avoid overfishing of species in PR are also imposed to St. Thomas St. John fishers, creating an unnecessary economic hardship to the local fishers of these islands.

- We would like to receive clarification on the role of councils in international fishery affairs. Historically, our council has as one of its original objectives the “promotion of pan-Caribbean management strategies,” given our dependence of fishery management of shared stocks in upstream islands. Therefore, we have participated in the delegation of the Western Central Atlantic Fishery Commission and other international bodies that oversee Caribbean basin fisheries.

If the MSA reauthorization addresses international issues, we would like to see some language as to the role of councils in international bodies.

Finally, we believe that the MSA is working and may only need fine adjustments, but the above mentioned issues with some of its requirements should be considered to provide the necessary flexibility in its implementation process, especially in the Caribbean region.

Thank you very much for this opportunity to submit our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carlos Farchette', with a stylized flourish at the end.

Carlos Farchette  
Chair, CFMC