

FRAMEWORK 19

APPENDIX V

Revised proposal from Maine DMR related to NGOM hard-TAC

REVISED Maine DMR Proposal for NGOM Management Area TAC

Maine DMR proposes a revised initial NGOM TAC of 126,000 pounds (the annual average of all federally permitted vessels (158,069 pounds), minus a 20% (31,614 pounds) conservation reduction). This TAC differs from DMR’s original proposed TAC of 136,000 pounds for two principal reasons:

- 1.) DMR subsequently generated a more comprehensive record of landings data through 2006 (these methods were approved by the scallop PDT on October 19).
- 2.) DMR has analyzed this revised data, and removed all landings from groundfish and Essential Fish Habitat closures in addition to all general category trips over 1200 pounds.

Additional Justification:

- While A11 stipulates that all federal permit holder landings from the NGOM count toward the NGOM TAC, state waters landings by federal scallop permit holders were not included in the development of the TAC. The Council’s decision to base the NGOM TAC exclusively on the federal portion of the resource was based on the assumption that “since NMFS can’t track state landings there is no way to monitor a TAC that encompasses both landings from state and federal waters, so this alternative applies only to the resource in the federal portion of the NGOM.” This statement is inaccurate. All federal scallop vessels are required to submit VTR’s documenting their catch in both state and federal waters. In fact, NMFS data documents that roughly 50% of VTR landings (2000-2006) came from state waters (see table). Consequently, *as NMFS data indicates*, a TAC based exclusively on the federal portion of the resource will limit federally permitted scallop fishermen in the NGOM to approximately half their historic landings.
- Limited access vessels took an average of 29,000 pounds of scallops from the NGOM from 2000-2006 yet limited access vessels’ landings were excluded from the NGOM TAC development process. Limited access vessels landings must be included in NGOM TAC development. To require a fishery to be managed by a hard TAC but not apply its landings toward the attainment of that TAC is illogical.
- The exclusion of all GC landings over 1200 pounds results in an average annual exclusion of 24,000 pounds, or roughly 15% of overall NGOM landings. Although some of these entries may have contained errors, they certainly were not all erroneous. The PDT argues the data-limited nature of the NGOM scallop resource necessitates a reduction of average landings of between 20-40% to set a conservative TAC. DMR maintains that since 15% of landings have already been excluded, a reduction of 20% is adequately conservative.

Annual landings (open areas) for federally permitted vessels, 2000-2006

Calendar Year	General Category Vessels			Limited Access Vessels			Grand Total
	State	Fed	Total	State	Fed	Total	
2000	39,878	30,127	70,006	43,006	28,214	71,220	141,226
2001	84,842	59,382	144,224	27,450	1,400	28,850	173,074
2002	133,613	140,177	273,790	54,253	5,546	59,799	333,589
2003	89,882	84,488	174,370	2,673	0	2,673	177,043
2004	22,832	24,571	47,403	18,083	1,687	19,770	67,173
2005	17,568	59,366	76,934	6,350	14,100	20,450	97,384
2006	29,788	87,207	116,995	0	0	0	116,995
Total Yearly Average	418,403	485,318	903,722	151,815	50,947	202,762	1,106,484
	59,772	69,331	129,103	21,688	7,278	28,966	158,069