

December 21, 2016

Leann Bosarge
Chair, Gulf of Mexico Fishery Management Council
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Madam Chair and Council Members:

Thank you for providing the Louisiana Shrimp Task Force the opportunity to submit comments regarding Shrimp Amendment 17B. Established by Louisiana Revised Statutes 56:494, the Task Force is made up of Louisiana shrimp harvesters, dockside dealers, and processors and represents the interests of Louisiana's shrimp industry. Of our many duties, our first charge is to "coordinate efforts to increase shrimp production and marketability".

Penaeid shrimp support the most valuable and second largest commercial fishery in Louisiana. Louisiana is not only the top harvester of shrimp in the Gulf of Mexico but also consistently lands more pounds of shrimp than any other state in the United States. Needless to say, we have a major stake in the outcome of Shrimp Amendment 17B. Please find our recommendations for this amendment, listed by actions and alternatives, below:

Action 1 – Aggregate Maximum Sustainable Yield (MSY) for the Gulf of Mexico (Gulf) Shrimp Fishery.

We do not think setting an aggregate MSY for the Gulf shrimp fishery is appropriate or necessary as shrimp are an annual crop, dependent on growth indicators such as temperature and salinity in estuarine waters. However, if you are absolutely required to do so, we support Alternative 2 (Establish aggregate MSY using the method developed by the Shrimp Effort Working Group (SEWG). For the federal commercial Gulf shrimp fishery, aggregate MSY = 112,531,374 lb of tails.).

Action 2 – Aggregate Optimum Yield (OY) for the Gulf Shrimp Fishery

For the reasons listed above, we do not think setting an aggregate OY for the Gulf shrimp fishery is appropriate or necessary. However, if you are absolutely required to do so, we support Alternative 2 (For the federal shrimp fishery, aggregate OY = 85,761,596 lb of tails which is aggregate MSY reduced for certain biological, social, and economic factors.).

Action 3 – Minimum Threshold Number of Gulf Shrimp Vessel Permits

The shrimp fleet has declined substantially since the permit moratorium was first implemented. We suggest adding a new alternative that would set the minimum threshold number of Gulf shrimp vessel permits at 1,350, the current number of valid permits in the fishery. This represents the minimum amount of participation needed to sustain the infrastructure of the Gulf shrimp industry.

However, if the Council is not able to add a new alternative, we support Alternative 5 (Set a threshold number of valid or renewable Gulf shrimp vessel permits equal to the predicted number of active permitted vessels—those with landings from offshore waters—in a year with

relatively high CPUE in the offshore fishery without substantially reduced landings, and with effort that is close to the effort needed to achieve OY) and Option 5a (2007; 1,131 permits). While Option 5a would only allow 1,131 permits, this option represents the highest number of permits currently available through this amendment.

Action 4 – Response When Threshold Number of Shrimp Moratorium Permits is Reached

We support Alternative 4 (When the number of valid or renewable shrimp moratorium permits reaches 1,300, the Council will form a review panel to review the details of a permit pool and other options. If the number of permits reaches the threshold set in Action 3, any permits that are not renewed within one year of the expiration date on the permit will go into a Gulf Shrimp Vessel Permit Reserve Pool. The panel would consist of Shrimp AP members, SSC members, NMFS and Council staff.). While Alternative 4 delays action on this issue, it is the best alternative available in this amendment as it requires action when the number of permits reaches 1,300.

Action 5 – Issuance and Maintenance of Reserved Gulf Shrimp Vessel Permits

The Council voted to move this action to “considered but rejected”. We agree that this action should be considered if and when the number of permits reaches 1,300, as described in Action 4.

Action 6 – Transit Provisions for Shrimp Vessels without a Federal Permit

We support Alternative 2 (A vessel possessing shrimp may transit Gulf federal waters without a federal vessel permit if the fishing gear is appropriately stowed. Transit means non-stop progression through the area. Fishing gear appropriately stowed means the trawl doors and the nets must be out of the water, and the bag straps must be removed from the net.).

Again, as representatives of the largest shrimp industry in the United States, we thank the Council for considering our recommendations. These alternatives would help achieve the purpose and need of this amendment, especially promoting economic efficiency and stability in the fishery and providing flexibility for state-registered shrimp vessels. Please do not hesitate to contact us should you need additional information.

Sincerely,



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