

**Reef Fish Amendment 36A - Commercial IFQ Program Modifications  
Public Hearing Comment Summary  
Webinar  
March 23, 2017**

**Council/Staff**

Ava Lasseter  
Emily Muehlstein  
Bernadine Roy

15 members of the public attended.  
2 members of the public spoke.

**Katie Thompson** – Commercial fisherman

Katie would like the Council to reconsider the distribution of shares in the programs. As a non-shareholding commercial fisherman she finds it difficult to find allocation to fish. The current IFQ program allows businesses to monopolize the fishery and in some cases people who are non-fishermen are profiting off of the resource. In Action 2.2, Katie supports Alternative 4. The Council should redistribute shares to fishermen who have only been able to lease allocation rather than spread them among entities that already own shares.

**Eric Brazer** – Gulf of Mexico Share Holders Alliance

He would like the Council to read his letter outlining the preferred alternatives of the Share Holders Alliance. He would also like to stress for Action 2.2 that shares should be put to good use in a quota bank to address the need of new entrants or small fishing businesses. The Council needs to find a way to improve access for the next generation of fishermen.

**Summary of Written Comments Received**

March 24, 2015 – March 29, 2017

41 members of the public submitted comment.

**Action 1 – Commercially Permitted Reef Fish Vessel Hail-in Requirement**

- Support for Alternative 1, no action.
  - Commercial reef fish boats rarely land without IFQ species so no action is necessary.
- Support for preferred Alternative 2.
  - Additional efforts are necessary to deter fishermen and dealers from illegally landing IFQ species.
  - Expansion of hail-in requirements will improve enforcement and close loopholes that undermine the IFQ program.

**Action 2.1 – Returning Non-activated IFQ Shares to NMFS**

- Support for Alternative 1, no action.
  - Taking what isn't yours is considered stealing and NOAA should have made the rule to take shares from non-activated accounts when the IFQ program was implemented.
- Support for Alternatives 2 and 3.
  - Allowing commercial access to the allocation associated with non-activated accounts will help achieve optimum yield and provide economic benefit.
  - The Council should take a step further and take back shares that haven't been accessed the last three years.
  - Accounts that haven't been used for a year should be closed.

**Action 2.2 – Method of Redistributing Shares from Non-Activated Accounts**

- Support for Alternative 1, no action.
- Support for Alternative 2.
  - Businesses that are fishing in the industry should have an opportunity to harvest all species.
- Support for Alternative 4
  - This alternative should be based on landings from 2016 and 2017 rather than 2015.
  - Distributing shares to allocation-only fishermen will save on wasteful discards by reducing bycatch.
  - Shares should be distributed to active fishermen that do not already have shares. Rather than distribute to existing shareholders, it's time to help out the fishermen who have to lease allocation.
  - Historical participation should be taken into account so distribution is based on the length of time someone has been in the fishery.
- An alternative should be added to distribute the annual allocation associated with the shares through an industry-run quota bank. Shares should be redistributed in a way that maximizes the value by using them to address a clearly defined fishery problem such as red snapper discards or fishery transition to the next generation.

**Action 3 – Retaining Annual Allocation Before a Quota Reduction**

- Support for Alternative 1, no action.
  - NMFS has enough power and shouldn't take away fish.
- Support for preferred Alternative 2.
- Support for preferred Alternative 2, Option a.

**Action 4 – Dealer Notification Requirement for Beginning to Offload IFQ Species**

- Support for preferred Alternative 1, no action.
  - Requiring dealers to make offload notification will not solve the problem, it will cause frustration and delay operations.

### **Other IFQ Related Comments**

- ACL increases should be distributed to commercial fishermen that own little or no shares rather than to established shareholders.
- The IFQ system should be removed because it has benefited a few people who own the majority of shares and caused non-shareholders to work for very little profit.
- It is too expensive to buy in to the IFQ program.
- The IFQ program is an entitlement and gives a public resource to private individuals for profit.
- Shareholders should not be allowed to profit from IFQ shares as if it were a commodity to trade. Shareholders should be required to be fishermen.
- Some fish houses own shares and refuse to buy catch from small fishermen who don't purchase allocation from them.
- If fishermen don't catch their shares, those shares should be redistributed each year.
- The IFQ program has provided stability to the seafood markets.
- Restrictions on the use of shares and allocations would reduce the efficiency of the IFQ program.
- The Council should consider creating a use-it-or-lose-it provision for shareholders that redistributes shares to active fishermen.
- Only reef fish permit holders should be allowed to have IFQ. People should not be able to make money from the program without fishing.
- To help with bycatch loss, NOAA should withhold a portion of the red snapper allocation each year to lease to vessels without red snapper IFQ shares. Limits should be placed on how much and how often an account holder can lease this allocation which can't be transferred once it's distributed.
- Divide all shares equally among permit holders.
- People who bought permits after the IFQ program was implemented should have known what they needed to fish IFQ species.
- A "Purchased Fishing Quota" program should be created where vessels establish what they can harvest for the year and pay the federal government. Quota can be sold within the year and unused quota will be returned and distributed to new entrants.

### **Other Comments**

- Regional management should be considered for private recreational anglers only.
- Every new rule implemented makes the fishing process more complicated.