

**ATTACHMENT B**

Written Comment Submitted at  
Scallop Amendment 13 Public Hearing  
February 7, 2007  
Portsmouth, NH



## Industry Funding of the Scallop Fishery Observer Program

### A 4% Set-aside is Necessary for Reliable Bycatch information

"I've talked to guys who are making so much money they say they do not know what to do with it," said Bill Arruda, vice president of Kyler's Catch seafood market. - *High scallop prices keep profits flowing into port*, New Bedford Standard-Times, 1/21/2007

The proposed Standardized Bycatch Reporting Methodology would require observer coverage for **15,891** scallop fishing days to generate sufficiently precise bycatch information about the scallop fishery.

Sector	Observer Days Required	Key Bycatch Species*
<b>Limited Access</b>		
New England Open Area	2726	Ocean Pout
New England Closed Area	5219	Yellowtail Flounder
Mid-Atlantic Open Area	3470	Sea Turtles
Mid-Atlantic Closed Area	3429	Yellowtail Flounder
Mid-Atlantic Trawl Limited Access	95	Multiple Species
<b>General Category</b>		
New England Closed Area	24	Multiple Species
New England Open Area	180	Scallops
Mid-Atlantic Open Area	270	Fluke/Scup/ Black Sea Bass
Mid-Atlantic Closed Area	21	Multiple Species
Mid-Atlantic Trawl	457	Yellowtail Flounder
<b>Total Observer Days</b>	<b>15,891</b>	

*(Adapted from Table B-4, NE Region Standardized Bycatch Reporting Methodology)*

**\*The Key Bycatch Species is the species which requires the highest observer coverage to achieve the target level of precision.**

Using the \$1150 per observer day figure provided to the Council in 2004, the cost of the necessary coverage in the scallop fishery is approximately **\$18.3 million**.

Dr. Dvora Hart presented figures to the NEFMC scallop committee in January 2007 which indicated that the scallop fishery lands close to **\$450 million** annually.

To fully fund the necessary observer coverage for the scallop fishery, the Council should use Amendment 13 to approve a set-aside of **4%** of the overall scallop catch to pay for a robust observer program. In addition, the Council should move forward with a method to fund the scallop observer program out of a common pool of set-aside funds.

This set-aside would provide the necessary high-quality information about bycatch of yellowtail flounder and other marine life in the scallop fishery.

*rec'd at Council mtg (2/7) - gib Bragan*