



September 9, 2022

John Carmichael
Executive Director
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Re: Adding Little Tunny (False Albacore) to the SAFMC's Coastal Migratory Pelagics Fishery Management Plan

Dear Mr. Carmichael and Council Members:

The undersigned organizations, businesses, and private recreational anglers urge the South Atlantic Fishery Management Council (SAFMC) to consider re-adding false albacore (formally known as little tunny, *Euthynnus alleteratus*) to the Council's Coastal Migratory Pelagics Fishery Management Plan (CMP FMP). False albacore were previously included under this FMP but were removed in 2011.

False albacore are a tremendously important species for recreational anglers and businesses from Florida to Massachusetts, and also support commercial fisheries in the Southeast to supply bait and food markets. Despite its value to both sectors, the species has no formal management in place at the state, regional, or federal levels.

For many light-tackle and fly-fishing anglers and guides up and down the Atlantic coast, false albacore are a staple species that provide exciting inshore angling opportunities. According to the Marine Recreational Information Program (MRIP), over the past ten years Atlantic coast recreational anglers are estimated to have taken over half a million trips annually in pursuit of false albacore, catching on average nearly two million of them per year.¹ Effort is largely concentrated in various regions and ports over the course of the season (e.g., Cape Cod, MA and Cape Lookout, NC), generating a great deal of local economic activity that supports coastal communities.

The landscape of commercial fisheries for false albacore is less clear. According to NOAA Fisheries' commercial landings query tool, 2021 commercial landings of false albacore for the Atlantic coast were 435,132 pounds, which is in line with the most recent 10-year average for landings.² However, other information regarding commercial false albacore fisheries—such as what gear is used, existing markets for the species, and potential issues regarding underreporting and bycatch—is not readily available. We are not aware of substantive commercial regulations for false albacore at the state, regional, or federal levels. In addition, anecdotally, we are hearing reports of increasing false landings for the bait market that are not reported and are thus unaccounted for.

Management History

In 2011, the SAFMC voted to remove false albacore from the CMP FMP through Addendum 18, which sought to bring FMP into compliance with new requirements stemming from the 2006 reauthorization of the Magnuson-Stevens Act (MSA). At the time, the SAFMC deemed that management and regulation of false albacore would not “serve some useful purpose” because of poor data availability, low landings, and little expectation of overfishing.³ Since then, there have been efforts to manage false albacore by the MAFMC in 2016 and SAFMC in 2019, but neither was successful.^{4, 5}

The opportunity for states to manage harvest of the species does exist, and it was discussed during the Addendum 18 process.⁶ However, to our knowledge, no Atlantic coast state has developed any formal regulations for commercial or recreational false albacore fisheries. Florida does have a “Default Bag Limit for Unregulated Species” of two fish or 100lbs per person, per day (whichever is more), which applies to false albacore.¹ That being said, false albacore are a migratory species—the extent of which is not yet known—where regional or federal management would be far more appropriate and effective.

Rationale

While false albacore continue to support robust fisheries, our scientific knowledge about the species remains extremely limited. We do not know when and where they spawn, their seasonal movements or population structure, or the degree of post-release mortality in the recreational fishery. The American Saltwater Guides Association and partners are conducting an acoustic tagging study in Nantucket Sound this fall to examine movements and recreational post-release mortality,⁷ but that is the only current research effort on this species to our knowledge.

While we understand that false albacore were only included in the CMP FMP for “data collection purposes,” we believe that they meet the criteria for requiring management per the MSA—and contend that formal data collection efforts should resume. In line with National Standard Guidelines,⁸ false albacore should have an FMP because:

- The stock is an important component of the marine environment.
- The stock is targeted and caught by fisheries.
- An FMP could improve or maintain the condition and scientific understanding of the stock.
- The stock is important to recreational and commercial users and regional economies.
- Developing fisheries may emerge, and an FMP, with precautionary management strategies, should be in place to oversee it.
- There is no formal management or regulation for false albacore by federal or state entities.

¹ Florida Fish and Wildlife Conservation Commission. “Unregulated” Species. <https://myfwc.com/fishing/saltwater/recreational/unregulated/>

We contend that false albacore *do* require conservation and management and thus an FMP according to the MSA. Coastal communities and fishing businesses depend on this species being abundant so anglers can reliably encounter them. Further, while commercial landings are relatively low compared to other commercial species, we believe it is absolutely necessary that fisheries be accountable. In this case, absent any useful data about the stock and fishery, it is imperative that managers take a precautionary approach that establishes guardrails for both sectors to ensure a healthy false albacore fishery that supports diverse users.

Thank you for your consideration of our request.

Sincerely,

Paul Conti
Paul Conti

CC: Andy Strelcheck, Regional Administrator, Southeast Regional Office, NOAA Fisheries;
Russell Dunn, National Policy Advisor for Recreational Fisheries, NOAA Fisheries;
Christopher Moore, Executive Director, Mid-Atlantic Fishery Management Council;

¹ Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division August 19, 2022.

² Personal communications from the National Marine Fisheries Service, Commercial Fisheries. Landings. August 20, 2022.

³South Atlantic Fisheries Management Council. Final Amendment 18 to the Fishery Management Plan for Coastal Migratory Pelagic Resources. September 2011. <https://safmc.net/documents/2022/04/cmp-amendment-18.pdf/>

⁴ Mid-Atlantic Fishery Management Council. Unmanaged Forage Omnibus Amendment. September 2017. <https://www.mafmc.org/actions/unmanaged-forage>

⁵ South Atlantic Fishery Management Council. Mackerel Cobia Meeting. December 2019.

⁶ South Atlantic Fishery Management Council. Amendment 18.

⁷ American Saltwater Guides Association. New Research Partnership to focus on Beloved-But-Understudied False Albacore. June 2022. <https://saltwaterguidesassociation.com/new-research-partnership-to-focus-on-beloved-but-understudied-false-albacore/>

⁸ National Standard Guidelines, Magnuson-Stevens Act. 50 CFR Part 600 Subpart D. <https://www.ecfr.gov/current/title-50/chapter-VI/part-600/subpart-D>

